

Privacy Policy for Lexit Group AS

This is the privacy policy for Lexit Group AS, subsidiaries and its associated services. The DPO of Lexit Group AS is data controller for the processing of the personal data you send or provide to us. The words “we” and “our services” and Lexit in the policy refer to Lexit Group AS.

This privacy policy applies to our websites and the use of our mobile/digital services (“website”). The privacy policy describes how we collect, use and share personal data when you enter into an agreement to use our websites, and how we use cookies to register data about your use of our websites.

The privacy policy does not cover third-party websites and Lexit does not assume responsibility for the processing of personal data on such websites.

Personal data is information and assessments that can be linked to a specific individual. We process personal data in compliance with the general provisions of the Norwegian Personal Data Act and EU General Data Protection Regulation (GDPR), including regulations and other relevant legislation, such as the Marketing Control Act and the Accounting Act.

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1. Purpose and legal basis for processing

We process personal data to administer our customer relationship and to:

- fill orders
- make payments
- provide our services
- provide the necessary agreed service and relevant products and services
- answer queries from you
- make you aware of changes, and other situations where we need to know who we are in contact with.

Personal data is also used to adapt, improve and further develop our products and services, which means providing you with relevant information and recommendations as well as access to the relevant information and customised ads. You will be able to choose the services that suit you best.

We use the personal data solely for the purposes you have entered into an agreement on, consented to, which are necessary to administer our customer relationship, such as providing the agreed services to you, or which are necessary to fulfil another legitimate interest in which your need for privacy is considered.

2. What personal data we process

We collect personal data from various sources to fulfil the purposes listed above. These sources can be divided into two main categories:

- data you provide to us
- data we register about you when you use our services

Data we register about you when you use our services:

To optimise and develop our websites, we collect necessary information about your visit to our websites such as lexit.no, lexit.se, lexitgroup.com, lexitgroup.dk, lexcloud.com, captur.io, lexassetcontrol.com. This includes information on your web browser and operative system, screen size, device and the length of your visit. This information is stored by third parties such as Google Analytics or in Microsoft Azure for the length of time

specified by these services. Lexit has chosen 14 months as the shortest storage period according to Google's guidelines.

3. Sharing of information

The information is used solely for internal analyses in connection with optimizing the website or running our services to you. Personal data is not shared with third parties.

4. Sharing of information on social media

You can share the information from our public website on social media on Facebook, LinkedIn and Twitter, for example using the "like" button. If you choose to share information this way, your web browser will transfer personal and other data about you to the social network.

The same applies if you visit our website while logged into a social network.

Social media may obtain the following data about you:

- date and time of your visit
- domain name or URL of the website you are visiting
- your IP address
- your web browser
- your operating system

Lexit has no control over nor any responsibility for how social media use the personal data they collect about you. We therefore ask you to consult their terms of use. We recommend that you stay informed about the purpose and scope of the information collected about you on social media. You can block social media in your browser's settings. If you want to avoid social media registering what you do online, you must log out of that social media site.

5. Security

We work constantly to protect our customers' privacy. Our security work includes developing our IT infrastructure, training our staff and securing our facilities and equipment.

Lexit is responsible for ensuring that the personal data it collects is not used in violation of the purpose for which it was collected or in violation of applicable contracts and terms of use. For this reason, Lexit has developed procedures and measures to ensure that no unauthorised people gain access to your personal data. Examples of such measures include risk assessments, implementation of technological and organisational measures,

procedures for processing data and monitoring queries regarding access, correction, blocking and erasure; see section 6 below.

6. Storing and deletion

We store your personal data as long as it is necessary to fulfil the purposes described in this privacy policy. When your personal data is no longer relevant for the purposes for which it was collected, we will delete or anonymise it, including logos and other background information. You can at any time request that we correct, limit or remove personal data about you in accordance with our legal obligations; see section 7 below.

7. Your rights

Under the Personal Data Act, you are entitled to know what personal data we have about you. If the data we have about you is incorrect, you can request that it be corrected, supplemented or deleted. Registered customers can contact Lexit customer service for questions regarding the company's processing of personal data. You can send questions to privacy@lexitgroup.com. To ensure that personal data is given to the right person, we may demand that your request to access this data is made in writing, or that your identity can be verified in some other way.

In accordance with paragraph 28 of the Personal Data Act, personal data that is no longer necessary for the purpose for which it was stored will be deleted. We store personal data in accordance with the relevant legislation.

8. Use of cookies, etc.

We use cookies and other technology that stores information about your use of our services and website in order to analyse your patterns of use and to adapt our services and advertising.

Cookies are text files that the website stores on your computer. The files can only be read by us and you. We use cookies for the following purposes:

Quick access to pages with articles: To give you quick access to pages with articles, cookies are used to cache (store) articles locally so that they can quickly be downloaded even when you do not have direct access to the site.

To analyse and improve our services: We use various measuring tools that provide statistics and analyses of our services. These tools make it possible for us to recognise your browser over time, and through this, to learn if you have visited our website before and how often. They also give us an overview of how many unique users we have and how they

use our services. We use the information we have collected and analysed in order to develop and improve our services.

Advertising: Cookies help us to learn about the impact of our news articles and the information we send to our customers. For example, we register if you have clicked on a news article and how often you have clicked on a certain type of ad.

9. International Transfers of Personal Data

Where personal data is transferred outside the EU/EEA, Lexit ensures that appropriate safeguards are in place in accordance with GDPR Chapter V.

This includes:

- transfers to countries with an adequacy decision from the European Commission
- use of Standard Contractual Clauses (SCCs)
- implementation of supplementary technical and organisational measures where required

Typical transfer scenarios include:

- cloud services hosted outside the EU/EEA
- global service providers (e.g. analytics, infrastructure providers)

Lexit assesses each transfer to ensure that the level of protection is essentially equivalent to that within the EU/EEA.

10. Joint Controllers (GDPR Article 26)

In certain cases, Lexit acts as a **joint controller** together with one or more partners (e.g. subsidiaries, platform providers, integrations, or co-delivered services).

10.1 Allocation of Responsibilities

In such cases, Lexit and the partner(s) define responsibilities through a written agreement covering:

- purposes and means of processing
- data subject rights handling
- information obligations
- security responsibilities

10.2 Data Subject Rights

Unless otherwise specified:

- Lexit serves as the primary contact point for data subjects
- Requests can be submitted to: privacy@lexitgroup.com

Data subjects may exercise their rights against any joint controller.

10.3 Transparency

Key aspects of joint controller arrangements are made available upon request.

11. Company information about the data controller

Lexit Group AS

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