

# **Dencrypt Privacy Policy**

#### 1. PRIVACY COMMITMENT

- 1.1. Dencrypt is committed to protect and respect your privacy. We will not disclose, sell or distribute our customer's private information except for the limited circumstances listed under "Third Parties".
- 1.2. Your data will not be used for targeted ads, or any other kind of profiling.
- 1.3. This privacy policy (along with the relevant license agreement and any other related documents) sets out the basis on which we will process and retain the information you voluntarily provide to us.

#### 2. THE TYPE OF DATA WE COLLECT AND PROCESS

#### 2.1. Voice Data and Chat

- All content data, such as voice data and text messages, is end-to-end encrypted between user devices using Dynamic Encryption technology.
- Encryption keys reside only on the user device during a call and are effectively removed at call termination. Encryption keys
  cannot be recovered by Dencrypt nor by any third party.
- Chat data may be stored on the Dencrypt Server System but in encrypted form only.

#### 2.2. Log Data

- Dencrypt does not collect log data from user devices.
- The Dencrypt Server System does log relevant information required for call statistics and auditing.

#### 2.3. User Meta Data

- When an account for Dencrypt Communication Solution is created, we may ask you to provide: name, title, company, department and logo. These data will be displayed in the phonebook and will be visible to other users within your organisation.
- We may also ask you to provide an email address or phone number. This is only used for the first time registration. These data will only be visible for the administrators of the Dencrypt Server System.
- User meta data is stored on the Dencrypt Server System which is operated in secure environments either at Dencrypt's trusted cloud service provider or at the customer's premises. User meta data is only accessible by authorized and trained personnel.

# 2.4. Other Technical Data

 Dencrypt A/S collects the user device ID on the Dencrypt Server System in order to route encrypted calls and chat messages between user devices.

## 3. THIRD PARTIES

- 3.1. We may disclose your personal information to third parties in the following limited cases:
  - In the event we engage with third party service providers to help provide the product and services. Dencrypt will require such providers to comply with this Privacy Policy and obligations with respect to confidentiality.
  - If all or substantially all of our assets or the assets of any member of our group are acquired by a third party, in which case personal data held by us about our customers will be transferred assets.
  - If we are obligated to disclose or share your personal data in order to comply with any legal obligation, including any obligation to disclose personal data to a regulatory body or law enforcement agency in circumstances where a legitimate Court Order has been obtained from a Court of competent jurisdiction, or in order to enforce or apply the terms of the relevant license agreement and/or other agreements. It should be noted that Dencrypt is technically unable to disclose in decrypted form any conversation or message communicated using our products.
  - If disclosure is necessary to protect the rights, property, or safety of, inter alia, our business, our employees, or our customers, we may disclose for the purposes of fraud protection and credit risk reduction, as well as the prevention of hostile acts.

## 4. MARKETING

- 4.1. If you are an existing customer, we will only contact you by electronic means with information about products and services similar to those, which were the subject of a previous sale to you.
- 4.2. We will not use your personal data for marketing purposes without first requesting and obtaining your permission to do so.

## 5. NOTIFICATION OF CHANGE

- 5.1. This Privacy Policy may be updated. We will make the revised Privacy Policy available at www.dencrypt.dk.
- 5.2. Our customer's continued use of our products and services after changes become effective constitutes an acceptance of the revised Privacy Policy.

Revision 1.0 1



# 6. CONTACT

 $6.1. \quad \text{Questions, comments and requests regarding this policy should be addressed to info@dencrypt.dk}$ 

Revision 1.0 2