

## **Websystems Privacy Policy (Sales Portals)**

We created this privacy policy in order to assure you of our commitment to privacy. We encourage you to read this Policy before using any of our websites listed below:

[www.Websystems.no](http://www.Websystems.no)  
[www.websystems-hosting.com](http://www.websystems-hosting.com)  
[www.Websystems-design.com](http://www.Websystems-design.com)  
[www.gdpr-system.eu](http://www.gdpr-system.eu)

For these websites our role is a Data Controller, since you have no processing inside the above websites, that actually processes your personal information. (We do not store any information here.)

Your contactperson for all of our websites are,  
Data Protection Officer: Jan Ove Berg  
Email: [DPO@websystems.no](mailto:DPO@websystems.no)  
Phone: +47 46950996

**Your use of these websites, will therefore, signify that you agree with all terms of this Policy, so please do not use the above websites if you disagree with any part of this Policy.**

### **1. How do we collect information & what information are we processing:**

#### **1a. Personal Information.**

None of the above websites are storing any personal information inside the websites, nor are they providing any user accounts. There are therefore no Data subject rights available on these websites, except the following supported articles mentioned in section "10. Your rights".

Any information forwarded to our other websites are therefore exclusively initiated by you, - the user, either from yourself on our contact forms, or through your direct actions that will initiate an order for a service or a product, which again leads to a contractual obligation on our other websites, serving that specific purpose. (Those other websites have their own GDPR compliant processes which are properly described with their own Privacy Policies.)

#### **1b. Sharing of the collected information.**

We may share the above information above or the cookie information below, with third party companies that perform services on our behalf, including our own websites, or through legally claimed requests from authorities, if related to security breaches.

### **2. Cookie Information (From our Cookie Policy).**

Like most companies are we using some enhancement services on the above websites, to ensure continuous improvement of our websites, but also to ensure the proper security of our web based services, in order to secure availability, integrity and privacy, for you as a user.

#### **Our cookies collect the following information:**

When you visit the Service, we may send one or more cookies. The cookie is a small text file containing a string of alphanumeric characters to your computer, that uniquely identifies your browser.

#### **About 3rd Party usage.**

Security on our forms: We are using Google captcha that collects IP addresses to avoid intruders misusing the forms for illegal purposes.

**Analytics:** We are using Google Analytics for all of our websites.

You can read Google's policy = <https://policies.google.com/privacy?hl=en> or reserve yourself by using Analytics opt-out = <https://tools.google.com/dlpage/gaoptout/>

**Short explanation about cookies in general.**

- A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the websites.
- A session cookie is temporary and disappears after you close your browser. (It will not remain on your hard drive.)

Cookies do not cause damage to your computer systems or files, and only the websites that transferred a particular cookie to you, can read, modify or delete such cookies, as long as they are still present for your browsers. If you do not want information collected through the use of cookies, there are simple procedures in most browsers that allow you to delete existing cookies, to automatically decline cookies, or to be given the choice of declining or accepting the transfer of particular cookies to your computer. Please refer to your browser instructions or help screen, to learn more about these functions. You should however note, that declining cookies may make it difficult or impossible for you, to use all portions or services of websites.

**3. Log information.**

Log file information is automatically reported by your browser or mobile device each time you access the Service. When you use our Services, our servers automatically record certain log file information for technical support purposes. These server logs may include information such as your web requests, Internet Protocol ( IP ) address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links and functionalities of the Services, domain names, landing pages, pages viewed, and other similar information.

**4. Links.**

The websites contain links to other websites. Please be aware that we are not responsible for the content or privacy practices of such other websites. We encourage our users to be aware when they leave our websites to read the privacy statements of any other websites, that collects PII - Personal Identifiable Information.

**5. Compliance and cooperation with regulatory authorities.**

We regularly review our compliance with our Privacy Policy. We also adhere to several self-regulatory frameworks, which follow EU-GDPR compliance. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We have processes in place to contact and cooperate with the appropriate regulatory authorities, including local data protection authorities to resolve any complaints or to manage our legal obligations.

**6. How do we use your information?**

Personal information in our forms are used by us for security purposes on the above websites, or for legal reasons on our other websites where the information collected by our company may be used for feedback, self-services, or promotional purposes to you, for content improvements, or for updates about new product developments for you.

We may use your personal information for internal purposes and will not provide it to any third party, such as marketing firms. We keep our customer's personal information confidential and use it only to send important information to our customers.

**7. Children.**

The above websites are not designed for or directed at children 16 years of age or younger, and we do not intentionally collect, or maintain any such personal data.

**8. Sharing of Your Information.**

We will never disclose any PII - Personal Identifiable Information to anyone outside EU/EEC, unless it is part of a legal binding contract with you on our other websites.

**9. Security.**

We will never request login information, sensitive information or financial information from you on the above websites. On our contact forms we only request enough information about you in order to contact you back. The rest of the information is voluntarily.

We take precautions to protect the personal information when you submit personal data through visiting our secured websites, or through the contact forms, your data will be secure both offline and online. When we collect personal information from you, the information is encrypted and transmitted to us in a secure way, using secure captcha and secure mails.

The information can only be accessed by a few selected employees who need the information to perform a specific job. Our employees are required to certify the understanding that all personal and sensitive information is considered confidential. We will take appropriate action against the employee who fails to acknowledge these facts. Our company has security measures to protect against the loss, misuse, and alteration of personal information under its control.

Further information on our security levels for our other relevant websites, can be found as part of our DPA - Data Processing Agreements after customers have logged in to their client area using this link <https://www.websystems-hosting.com/whmcs/clientarea.php> , which describes how we comply with Art.32 GDPR - Security of processing.

All your data are stored only within EU/EEC, as we are using the Ireland region in AWS - Amazon Web Services, for all of our services and from all of our websites. Your information is restricted from AWS, and the backups are also encrypted, so they have no access nor any insight into your data.

AWS are also responsible for the general infrastructure security to comply with Art.32, and also other relevant parts of GDPR, as our main supplier of hosting services. Please also check our security section from this link <https://www.websystems-hosting.com/privacy-and-data-security/>.

#### **10. Your rights. (SAR - Subject Access Rights.)**

As an individual, you have the following rights for the above websites, when we collect information about you for our processes:

You should expect us to provide you with an easily understandable overview of your Privacy rights, the Privacy policy we have in place to secure your rights, and the terms and conditions for using our websites. All content should be in a clear and consistent language, so it should be easy for you to understand, based on the requirements from:

#### **Art.12 – Transparent information**

<https://www.gdpr-system.eu/article-12-transparent-information-communication-and-modalities-for-the-exercise-of-the-rights-of-the-data-subject/>

When your information is being used by the above websites like we have explained, or being used in our other websites, you also have this right:

#### **Art.13.1c Right to be informed.**

<https://www.gdpr-system.eu/article-13-information-to-be-provided-where-personal-data-are-collected-from-the-data-subject/>

The GDPR also dictates that we should have appropriate measures in place to mitigate any security to protect your personal information. This has been properly designed for the above websites, and have been further extended and implemented for the rest of our websites.

Art.25 <https://www.gdpr-system.eu/article-25-data-protection-by-design-and-by-default/>

Art.32 <https://www.gdpr-system.eu/article-32-security-of-processing/>

(Please note: For our other websites connected with the above websites you have similar rights as above, and then several additional rights. If you will be using any of our other websites, then please also read section "14. Our other websites", if interested in this.)

#### **11. When are we with our websites, not directly responsible for your Privacy rights?**

Since we have a lot of services, and if your data has been registered from a company that you are an employee of, then all of these rights, should be managed by your own employer, usually through your user administrator in your company. (In this case, we have not registered the PII - Personal Identifiable information, but yourself or your employer has done it to make use of our services on behalf of your company.) In such a case your company is defined as a Data Controller, and we are defined as a Data Processor. The legal Privacy framework between our companies is then managed through our DPA - Data Processing Agreement. In this case, your privacy rights are managed by your own company, and through our common DPA.

#### **12. Our rights.**

We have the right to register information about potential customers, whom we have a legitimate interest in doing business with, and where they have initiated a request to us, or as a step to entering into a contract, or to comply with other legal obligations. (GDPR: Art.6 (a, b, c, f)). We also have the right to contact the visitors of our services regarding our business purpose.

We also have the right to change our privacy policy at any time without prior notice. The modified policy will be applicable to all visitors immediately after it is updated. For your convenience, the last revised date of the policy will be posted on the top of the privacy policy page.

If you agree with our terms and conditions of this policy, then just continue using our websites, which will register your information and acceptance date, otherwise please don't continue using any of our websites.

### **13. Complaint.**

Finally, you also have the right to file a complaint with your local GDPR authorities if we are not responding to your rights, or are not in your opinion, complying with the GDPR for whatever reason. (Please be sure that there is a valid and harming reason impacting you as an individual, and not only a misunderstanding, before you exercise this final right, as it will create a lot of work many places.)

**Art.77.** <https://www.gdpr-system.eu/article-77-right-to-lodge-a-complaint-with-a-supervisory-authority/>

### **(End of Privacy Policy - Customer Portals)**

### **Appendix 1.**

#### **14. Our other websites.**

(This is not part of the above Customer Portal websites, but refers to our other websites. If you have no intention of using our forms or contacting us from the above websites, then you do not need to continue reading the rest of this policy, as it is here to just ensure you understand the differences between the above websites and the rest of our websites that are connected with the above websites.)

#### ***You may also from our other websites, have the following rights:***

All content should be in a clear and consistent language, so it should be easy for you to understand.

#### **Art.12.**

<https://www.gdpr-system.eu/article-12-transparent-information-communication-and-modalities-for-the-exercise-of-the-rights-of-the-data-subject/>

When your information is also being used in our other websites, you also have this right there too.

#### **13.1c Right to be informed.**

<https://www.gdpr-system.eu/article-13-information-to-be-provided-where-personal-data-are-collected-from-the-data-subject/>

The GDPR also dictates that we should have appropriate measures in place to mitigate any security to protect your personal information.

This has been further extended and implemented for the rest of our websites:

**Art.25** <https://www.gdpr-system.eu/article-25-data-protection-by-design-and-by-default/>

**Art.32** <https://www.gdpr-system.eu/article-32-security-of-processing/>

#### **And there, you therefore also have these additional rights:**

**Art.15 Right to access,** <https://www.gdpr-system.eu/article-15-right-of-access-by-the-data-subject/>

**Art.16 Right to rectification,** <https://www.gdpr-system.eu/article-16-right-to-rectification/>

**Art.17 Right to erasure (Right to be forgotten),**

<https://www.gdpr-system.eu/article-17-right-to-erasure-right-to-be-forgotten/>

**Art.18 Right to the restriction of processing,**

<https://www.gdpr-system.eu/article-18-right-to-restriction-of-processing/>

**Art.20 Right to data portability,** <https://www.gdpr-system.eu/article-20-right-to-data-portability/>

**Art.21 Right to object to processing,** <https://www.gdpr-system.eu/article-21-right-to-object/>

#### **In plain english, this means:**

1. Opt out from any newsletters
2. Opt out from a specific processing purpose
3. Reduce the amount of a specific processing purpose
4. Access, make changes or updates for your account profile page
5. contact us about any of the above, on either phone or email.

#### **There are also legal restrictions on how much of this that can be done.**

The most important criteria for our other websites is that you must be able to identify yourself with a user-id and also to be able to login, in order to request any of these rights. Then you also need to clearly indicate the information that you wish to have changed. We will apply this as soon as possible.

We may need to retain certain information for record-keeping purposes and therefore keep some residual information that will remain within our database and other records which will not be removed or changed. The Personal Information will normally be retained during the period in which our services are provided to you. Any requested deletion that you could not do yourself, will be removed by us from our online systems within 8 weeks after the valid request was registered, and then also totally removed from our backups with another further 180 days, which is equal to our backup retention period.

Please also note, by reading section "11. When are we with our websites, not directly responsible for your Privacy rights?" again, about DPA - Data processing agreements, as it might be your Company administrator, that is also administrating your rights on your behalf, using a DPA.