

Data Policy

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This Data Policy is only available in the English language.

Article I. General

Section 1.01 About the Data Policy

Enablesus ApS, along with its parents, subsidiaries, and affiliates (also referred to as “Enablesus”, “we”, “us” or “our”) respects the right of each natural person (the “User”) to personal privacy and protecting Users’ information is of high priority. Enablesus is a company registered in the Kingdom of Denmark (reg. no. 41936967, with a physical address at Dantes Plads 1, st. th., 1556 Copenhagen, Denmark), and Enablesus has prepared this Data Policy (the “Data Policy”) to describe our practices regarding Personal Information (the “Personal Information” as defined in Article II) which we collect from Users of our software Services (the “Services”), and our practices regarding Organisation Information (the “Organisation Information” as defined in Article VII) which we collect from public sources or are directly included by organisations (in this context the “Customers”) under agreement with Enablesus and made available on the Services. The Services are provided pursuant to generally accepted industry standards and are including but not limited to the domain www.enablestus.com, all subdomains, and all other online services directly operated by Enablesus ApS, and this may or may not include the Third Party Controlled Services (the “Third Party Controlled Services”), and Collaboration Partner Controlled Services (the “Collaboration Partner Controlled Services”), which are directly integrated into the Services of Enablesus as defined in Articles IV, V, and VI. Enablesus will ensure that this Data Policy is prominently displayed and accessible to Users and Customers in our Services. By using the Services, the User and/or Customer agrees to the data practices described in this Data Policy. The User expressly consents to the collection, use, and disclosure of their Personal Information only in accordance with this Data Policy. The Customer expressly consents to the collection, use, and disclosure of their Organisation Information only in accordance with this Data Policy.

Section 1.02 Security

Enablesus uses industry-standard technologies to help ensure data security when transferring and receiving Personal Information and Organisation Information exchanged between Enablesus, Users, Customers, Collaboration Partners, and Third Party Controlled Services. The Enablesus Services have security measures in place to protect for the loss, misuse, and alteration of all information.

Section 1.03 Updates of the Data Policy

Enablesus will periodically at its own discretion update this Data Policy to reflect Customer & User feedback, changes in changes applicable law, and changes in Services. Enablesus encourages Users and Customers to periodically review this Data Policy to be informed about how Enablesus protects and uses Personal Information and Organisation Information.

Article II. Users and Personal Information

Section 2.01 Users

The Enablesus Services are directed towards Users who are natural persons over the age of 18, operating in their business capacity and/or or their personal capacity. The Enablesus Services are not designed for or directed to any natural person under the age of 18, and we will not intentionally collect or maintain information about any natural person under the age of 18.

Section 2.02 User Rights

Enablesus adheres to the Data Protection Act of the Kingdom of Denmark (Act No. 502 of 23 May 2018) as well as to the European Union General Data Protection Regulation (EU 2016/679), also known as GDPR. Pursuant to these laws, Enablesus gives any Users the right to remedy any error related to, or otherwise complete, any Personal Information a User provides in our Services. Any User may also request Enablesus to remove any Personal Information, opt-out of Services and/or unsubscribe from Services. Modifications or removal of Personal Information, opt-out of Services and/or unsubscribe from Services may be completed via the User's access to the Services and/or requested at the following address: Enablesus ApS, Dantes Plads 1, st. th., 1556 Copenhagen, Denmark. Enablesus can also be reached via email at the following address support@enablesus.com.

Section 2.03 Collection of User Personal Information

Enablesus may collect Personal Information directly from Users, such as the User's name, contact information, and other personal and non-personal information. If a User purchases Services from Enablesus, we may request billing, credit card, and/or electronic money information. The credit card and electronic money information is not stored by Enablesus, but instead by a third party controlled service (see Article IV). Information about the User's computer network, hardware, and software may be automatically collected by Enablesus. This information can include: the User's IP address, browser type, domain names, access times, and referring website addresses. This information is used for the operation of the Services, to maintain and improve the quality of the Services, and to provide general statistics regarding the use of the Services.

Article III. Use of User Personal Information

Section 3.01 Use for Services

Enablesus uses information we receive directly from Users through the Enablesus website only for the purpose of the Services, and Third Party Controlled Services which are directly integrated into the Services, only in the ways which are disclosed in this Data Policy. Information provided to Enablesus directly by our organisation Customers and our Collaboration Partners (the "Collaboration Partners") is collected by those Customers and Collaboration Partners under their own data policies, and Enablesus is not liable for the use or disclosure of information collected by those Customers and our Collaboration Partners. This Data Policy does not apply to practices that Enablesus does not own or control, or to individuals that Enablesus does not employ or directly manage. In the case of Third Party Controlled Services which are directly integrated into the Services, the provider of the Third Party Controlled Services provides easily accessible information for their data policies associated with their services, links to this information for these can be found in Article IV. Third Party Controlled Services which are directly integrated into the Services are prohibited from using a User's Personal Information except to provide the Services and are required to maintain the strict confidentiality of user information.

Section 3.02 Use for Informing the User

Enablesus may also use the User's Personal Information to inform the User of other products or services available from and through Enablesus and our Collaboration Partners. Enablesus may also use the User's Personal Information to contact the User to inform about any disruptions or changes in our Services. Enablesus may also contact the User via surveys to conduct research about the User's opinions of current Services or of potential new Services that may be offered.

Section 3.03 Use of Aggregated Data

Enablesus does not sell, rent, or lease User's Personal Information to third parties. Enablesus may share aggregated data with our Collaboration Partners and/or other trusted providers which was compiled from User's Personal Information. This aggregated data does not include personally identifiable information, and for the absence of doubt does not include the name, contact information, billing, credit card, and/or electronic money information of Users. This aggregated data is only used for statistical analysis, commercial prospection, and to make public any aggregated statistical results related to the Services and/or which are deemed to help encourage broader acts of sustainability.

Section 3.04 Transfer of Personal Information

Enablesus, in accordance with the compliant mechanism under the GDPR for allowed data transfer to third countries has signed with our Third Party Controlled Services and Collaboration Partners, standard contractual clauses compliant Danish, European Union, and United States of America regulations for the transfer of Personal Information to third countries which do not ensure an adequate level of data protection.

The Personal Information a User submits to Enablesus may be transferred or saved in Denmark and/or other countries to be processed by Enablesus in order to provide the Services to the User, including but not limited to Norway. If the user is not a resident of Denmark, the user consents and agrees that we may collect, process, use, and store a User's Personal Information, as discussed in this Data Policy, and outside the User's resident jurisdiction. The laws of Denmark and laws of other countries where we may store and process User Personal Information and other data may offer different levels of protection for personal information than may be available in the User's country.

Section 3.05 Disclosure in the Cases of Legal Process, Property Rights, and Safety

Enablesus will disclose the User's Personal Information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Enablesus or the Services; (b) protect and defend the rights or property of Enablesus; and, (c) act under exigent circumstances to protect the personal safety of users of Enablesus, or the public.

Article IV. Third Party Controlled Services

The following is a list of the Third Party Controlled Services which are integrated into the Enablesus Services, as well as an indication of Third Party Controlled Services integrated or shared with/by Enablesus, and links to the Third Party Controlled Services data policies.

Name of Third Party	Services Integrated or Shared With/By Enablesus	Link to Third Party Data Policies
Stripe https://support.stripe.com/	Payment services requesting billing, credit card, and electronic money information.	https://stripe.com/en-dk/privacy

Cookiesfirst https://cookiefirst.com/	Cookie and related notification management.	https://cookiefirst.com/legal/privacy-policy/
Microsoft Azure https://azure.microsoft.com/	Web hosting, application hosting, user data storage, organisation data storage, and data analysis services.	https://privacy.microsoft.com/en-us/PrivacyStatement https://privacy.microsoft.com/en-US/data-privacy-notice
Microsoft 365 https://www.office.com/	Email correspondence for direct User support and other direct contact.	https://privacy.microsoft.com/en-us https://www.microsoft.com/en-us/security
SendGrid https://sendgrid.com/	Email services associated with user and security functions (verifications, passwords changes...etc.)	https://sendgrid.com/policies/security/
Mailchimp https://mailchimp.com/	Emailed notifications and other announcements to Users.	https://mailchimp.com/gdpr/ https://mailchimp.com/about/security/
Google Analytics https://analytics.google.com	Tracking of user internet behaviour in accessing and using the Service.	https://policies.google.com/privacy https://policies.google.com/technologies

Article V. Use of Cookies

Section 5.01 What are Cookies?

Cookies and similar technologies are very small text documents or pieces of code that often contain a unique identification code. When a User visits a website or use a mobile application, a computer asks the Users computer or mobile device for permission to save a file on the Users computer or mobile device and gain access to information. Information collected through cookies and similar technologies may include the date and time of the visit and how you use a particular website or mobile application.

Section 5.02 Why are Cookies Used?

Cookies make sure that during the User's use of Services the User will remain logged in, all items remain stored in editable content, you can use the Services safely and the Services keep running smoothly. The cookies also ensure that Enablesus can see how our Services are used and how we can improve the Services. Furthermore, depending on User preferences Enablesus cookies may be used to present the User with targeted advertisements that match the Users search.

Section 5.03 What type of Cookies does Enablesus Use?

The types of cookies used in the Service are:

- a) **Necessary cookies:** These cookies are necessary for the Service to function properly. Some of the following actions can be performed by using these cookies. - Save cookie preferences for use of Services.
- b) **Performance cookies:** These cookies are used to gather statistical information about the use of Enablesus Services, also called analytics cookies. Enablesus uses this data for performance and website optimisation.
- c) **Functional cookies:** These cookies enable more functionality for the Services. These cookies can be set by Enablesus or Third Party Controlled Services. The following functionalities may or may not be activated when Users accept this category. – search and -payment.
- d) **Advertising / tracking cookies:** These cookies are set by Enablesus or external advertising partners and are used for profiling and tracking data across multiple websites. If a User accepts these cookies, we may show Enablesus or Third Party Controlled Services advertisements on other websites based on the User profile and preferences. These cookies also save data about how many visitors have seen or clicked on advertisements in order to optimize advertising campaigns.

Section 5.04 How to Switch Off or Remove Cookies?

A User can choose to opt out of all but the necessary cookies. In the settings of the browser, you can change the settings to ensure that cookies will be blocked. Most browsers provide you with an explanation on how to do this in the so-called ‘help-function’. However, if a User blocks cookies, it is possible that the User will not be able to enjoy all the Services that Enablesus has to offer, and blocking may negatively affect User experience.

Section 5.05 Schedule of Cookies

Cookie Name	Domain	Expiry
(Necessary) cookiefirst-id <i>Purpose:</i> This cookie contains your unique ID so CookieFirst can identify unique visitors to this website.	www.enablesus.com	1 year
(Necessary) cookiefirst-consent <i>Purpose:</i> This cookie saves your cookie preferences for this website. You can change these or withdraw your consent easily.	app.cookiefirst.com	1 year
(Functional) __stripe_sid <i>Purpose:</i> Stripe Payment	www.enablesus.com	30 minutes
(Functional) __stripe_mid	www.enablesus.com	1 year

<p><i>Purpose:</i> Stripe Payment, Stripe is used to making credit card payments. Stripe uses a cookie to remember who you are and to enable the website to process payments without storing any credit card information on its own servers.</p>		
<p>(Functional) Stripe</p> <p><i>Purpose:</i> Stripe is a third party use for payment and ensure that the site works properly, detect, and prevent fraud</p>	www.enablestus.com	1 year
<p>(Functional) _search</p> <p><i>Purpose:</i> Search cookie use for keeping your search text and to improve the Enablestus services.</p>	www.enablestus.com	1 year
<p>(Performance) __utmz</p> <p><i>Purpose:</i> Stores the traffic source or campaign that explains how the user reached your site.</p>	https://analytics.google.com	6 months
<p>(Performance) __utmz</p> <p><i>Purpose:</i> Set for interoperability with urchin.js.</p>	https://analytics.google.com	Session
<p>(Performance) __utmb</p> <p><i>Purpose:</i> Used to determine new sessions/visits.</p>	https://analytics.google.com	30 min
<p>(Performance) __utmt</p> <p><i>Purpose:</i> Used to throttle request rate.</p>	https://analytics.google.com	10 min
<p>(Performance)</p>	https://analytics.google.com	2 years

__utma <i>Purpose:</i> Used to distinguish users and sessions.		
(Performance) _ga_<container-id> <i>Purpose:</i> Used to persist session state	https://analytics.google.com	2 years
(Performance) _gid <i>Purpose:</i> Used to distinguish users.	https://analytics.google.com	1 day
(Performance) _ga <i>Purpose:</i> Used to distinguish users.	https://analytics.google.com	2 years
(Advertising) m <i>Purpose:</i> This cookie is being set for advertising purposes.	m.stripe.com	2 years

Article VI. Collaboration Partner Controlled Services

The following is a list of the Collaboration Partner Controlled Services which are integrated into the Services or integrated in the Collaboration Partner's own services the to use the Services, as well as an indication of Collaboration Partner Controlled Services integrated or shared with/by EnableSus, and links to the Collaboration Partner Controlled Services data policies.

Name of Collaboration Partner	Services Integrated or Shared With/By EnableSus	Link to Collaboration Partner Data Policies
None	None	None

Article VII. Organisation Information

Section 7.01 About Organisation Information

The purpose of EnableSus is to empower our world in leading sustainable livelihoods, by linking the transparency of sustainability between consumers and organisations. The Services are solely informative, providing to Users the sustainability information of organisations (the "Organisation Information") which allows Users to make their own informed decisions. For the absence of doubt the

Services do not make an evaluation of and/or score the sustainability actions of organisations, nor rank organisations based on their sustainability actions or lack thereof. The Services do evaluate the transparency of Organisation Information.

The Organisation Information is provided to the User without any warranty, express or implied, including fitness for a particular purpose, or any warranty of non-infringement. The Organisation Information provided is intended for general guidance only, and is not intended to be a substitute for detailed research or the exercise of personal or professional judgment. The Organisation Information provided by the Services may be derived from third-party sources and/or the organisation, and as such Enablesus cannot guarantee the accuracy or authenticity of Organisation Information provided by the Services. For the absence of doubt, Enablesus does not independently verify, validate, or audit Organisation Information.

The absence of an organisation and/or Organisation Information, in part or in whole, from the Services does not mean nor imply that the organisation or third parties do not make sustainability information about the organisation available, nor imply that any specific sustainability information does not exist or is not available from the organisation or third parties. In accordance with the above, the absence of Organisation Information from the Service is indicated in the services by the phrase 'This information is not currently available'.

Enablesus makes no representations or warranties, express or implied, and shall not be held responsible for any loss or damages whatsoever sustained by any User who relies on Organisation Information provided by the Services, or the absence of Organisation Information from the provided by the Services.

Enablesus makes no representations or warranties, express or implied, and shall not be held responsible for any loss or damages whatsoever sustained by any organisation based on the Organisation Information provided by the Services, or the absence of the organisation and/or Organisation Information, in part or in whole, from the Services.

Section 7.02 Collection of Organisation Information

Organisation Information available in the Services is collected by through two means:

- a) In the case where the organisation profile on the Services is not controlled by the organisation, Enablesus will indicate to Users of the Services that the Organisation Information provided by the Services is compiled by Enablesus. In this case Organisation Information is compiled and/or reviewed by natural persons at Enablesus from publicly available sources, which includes but is not limited to publicly available information originating from the organisation, but not provided directly by the organisation. In this case Enablesus will indicate to Users of the Services the sources of the Organisation Information and date of the last information update on the Services, and keep a record of the information and sources separate from the Services encase of any review.
- b) In the case where the organisation profile on the Services is controlled by the organisation (e.g. a Customer), the Organisation Information is provided directly by the Customer, and may or may not originate from publicly available sources. For some of the Organisation Information the Customer may select if it shall be made publicly available or not. Enablesus encourages, but does not require, the Customer to indicate the sources of Organisation Information and the date of the last information update by the Customer on the Services.

- c) Under no circumstances does Enablesus undertake to update or correct the Organisation Information disseminated in the Services. Similarly, Enablesus reserves the right to amend or correct the Organisation Information in the Services without prior notification.

Section 7.03 Use of Organisation Information

Organisation Information available in the Services is used by Enablesus in the following manner:

- a) Enablesus only makes Organisation Information available to Users of the Services, and Collaboration Partners who have a legal agreement with Enablesus for licence to integrate Organisation Information provided by the Services into their own services, which shall include data protections as least equal to this Data Policy. The use of Organisation Information by Collaboration Partners is described in Article VI.
- b) The Services will only display to Users certain Organisation Information which the User can access through the Services, to include but are not limited to the publicly available search engine and organisation profiles. It is noted that in the case described in Section 7.02(b), an organisation may choose to make certain Organisation Information publicly available through the Services or not.
- c) The Services of the publicly available search engine returns in a random manner Organisation Information to the User based on the results of a specific search in the Enablesus organisation database, based on the User's active input of criteria and words for the specific search.
- d) Separate from the publicly available search engine (see Section 7.03(c)), Organisation Information the User may find interesting are also presented in a random manner based on organisations commonality with the specific search of the User.
- e) Separate from the publicly available search engine (see Section 7.03(c)) and Organisation Information the User may find interesting (see Section 7.03(d)), Customers may enter into an agreement with Enablesus to sponsor their Organisation Information to Users more prominently in the Services and any such Organisation Information will be clearly marked as "Sponsored".
- f) Any trademarks or copy right of an organisation placed in the Organisation Information of the Services shall only be used by Enablesus to identify the organisation, and communicate Organisation Information in a manner consistent with Section 7.04.
- g) The Services will use Organisation Information to generate and display a Transparency in Sustainability Statue Badge (the "TSS Badge") for every organisation which has Organisation Information in the Services. More information regarding the TSS Badge can be found in the FAQ section of www.enablesus.com Enablesus shall only use the TSS Badge applicable to an organisation in the following manner:
 - i. The TSS Badge is visible to the Enablesus administration, to the Customer's authorized User in the organisation profile, and/or to the public User who is viewing organisation profile, accessed from the Services.
 - ii. The TSS Badge is visible in the Collaboration Partner administration, to the Collaboration Partner authorized User, and/or to the public User who is viewing Collaboration Partner services. Noting the TSS Badge may or may not link to the organisation profile on the Services.

- iii. The TSS Badge is visible on the Customer's internet service through the Enableus provided API. Noting the TSS Badge may or may not link to the organisation profile on the Services.
- h) The Organization Information in the Services may be transferred or saved in Denmark and/or to other countries to be processed by Enableus, or Collaboration Partners, in order to provide the Services to Users and Customers, including but not limited to Norway. If a Customer is not a resident of Denmark, the Customer consents and agrees that Enableus may collect, process, use, store, and transfer the Customer's Organization Information, as discussed in this Data Policy, and outside the Customer's resident jurisdiction. The laws of Denmark and laws of other countries where we may store, transfer, and process Customer's Organization Information and other data may offer different levels of protection for Customer's Organization Information than may be available in the User's country.

Section 7.04 Fair Commercial Practices

In accordance with fair commercial practices, and specifically the Danish Marketing Practices Act and the Danish Trademark Act, both implementing provisions of the EU directives and regulations which address unfair commercial practices, including similar applicable U.S. laws. Enableus ensures and gives notice of the following:

- a) That Enableus does not have the intent to provide information in the Services which are misleading, causes confusion, or causes unfair commercial advantage towards organisations. The Organisation Information provided by Enableus through the Services is defined in Article VII, and Enableus provides to any organisation and User the means to contact Enableus via email (whistle@enableus.com) regarding any inaccurate or misleading information and unfair commercial practices, and Enableus will investigate and when deemed appropriate rectify the information. For avoidance of confusion, Enableus shall have sole and absolute discretion to modify or not modify any information contained on the Enableus website, irrespective of whether you submit a request for correction with respect to any such information.
- b) To provide the Service, it is necessary to identify third party entities not affiliated with Enableus, which may be done by use of their names, trademarks, and/or other branding (together, "Third Party Marks").

Enableus respects the intellectual property rights of others. To that end, Enableus takes special care not to use any Third Party Marks in any manner likely to cause consumer confusion or mistake. Nevertheless, applicable law permits Enableus to use Third Party Marks without permission or under license. Enableus takes commercially-reasonable care to use only so much of these Third Party Marks as is reasonably necessary to provide the Service. Moreover, Enableus makes no attempt to claim a commercial association with any User or organisation whose Third Party Marks are used in providing the Service, with the exception of Customers who are identified in the Services by the absence of the 'Claim This Profile' button.

This means that, if a User, organisation, or Customer object to Enableus's use of Third Party Marks on the Services, Enableus has no obligation to remove the Third Party Marks against which an objection is made.

- c) There is no intent of Enableus to compete with organisations featured on the Services, insofar that the sustainability information of Enableus (e.g. an organisation profile) is not featured along side or in comparison with other organisations in the Services.

- d) The organisation profiles, that display Organisation Information available in the Services, are displayed the same common manner for all organisations.
- e) The search engine of the Services and information the User may find interesting do not favour any organisation, see Section 6.03(c) and Section 6.03(d) respectively.
- f) Specific products or services of Collaboration Partners may be displayed or integrated into the Services, and Enablesus has no intention to favour the products or services of one Collaboration Partner over those of another, or other organisations not in the Services.
- g) Any advertisement or sponsored information provided to Users by the Services will be clearly marked as “Ad” or “Sponsored” respectively.
- h) That any organisation and User is not restricted from contacting the Danish Consumer Ombudsman (at <https://www.forbrugerombudsmanden.dk/>) with regards to any fair commercial practices of Enablesus.

Article VIII. Services Availability

Enablesus only makes its Services available in the following jurisdictions, and the Services are thus blocked in jurisdictions not listed below.

Albania	Slovakia
Andorra	Slovenia
Austria	Spain
British Indian Ocean Territory	Sweden
Belgium	Switzerland
Bosnia and Herzegovina	Turks and Caicos Islands
Bulgaria	United States of America
Croatia	United State Minor Outlying Islands
Cyprus	United State Virgin Islands
Czech Republic	United Kingdom
Denmark	Vatican City
Estonia	
Fiji	
Finland	
France	
Germany	
Greece	
Hungary	
Iceland	
Ireland	
Israel	
Italy	
Kosovo	
Latvia	
Liechtenstein	
Lithuania	
Luxembourg	

Malta	
Monaco	
Moldova	
Montenegro	
New Caledonia	
Netherlands	
Norway	
North Macedonia	
Poland	
Portugal	
Romania	
Saint Helena	
Saint Kitts and Nevis	
Saint Lucia	
Saint Martin	
Saint Pierre and Miquelon	
Saint Vincent and the Grenadines	
San Marino	
Serbia	