



HIGHBRIDGE

PRIVACY POLICY

PROSPONGE APS



PRIVACY POLICY

Last updated: November 27, 2024

1. GENERAL

- 1.1 This Privacy Policy applies to all collected and processed personal data that you have provided to us, or that we have collected as a part of delivering our services/products. "Personal data" means any information that relates to an identified or identifiable natural person, either directly or indirectly.

2. IDENTITY OF THE DATA CONTROLLER

- 2.1 If you have any questions regarding this Privacy Policy, you may contact us using the information below.

Propsponge ApS
CVR-no. 43078992
Jens Otto Krags Gade 13, 2. 2.
2300 Copenhagen S
Denmark

Attn. Sebastian Erik Rehnby
sebastian@propsponge.com
+46 735 08 08 50

- 2.2 We are processing your personal data in accordance with the General Data Protection Regulation ("GDPR") and any national regulation applicable to us.

3. PURPOSE OF PROCESSING

3.1 Personal data

We collect the following non-sensitive personal data:

- Name
- Address
- E-mail
- IP address
- Payment activity and transactions with tenants
- Payment activity and transactions with vendors
- Tenant contracts
- Vendor contracts
- Vendor invoices

- 3.1.1 We process non-sensitive personal data on the basis of Article 6 in the GDPR, more specifically, our legal basis for collecting and processing personal data is for each service outlined below. The processing of your data is based on one or more of the following grounds:

- Consent – processing is based on an obtained consent from you.



- Contract – processing is necessary to fulfil or establish a contractual obligation with you.
- Legal obligation – processing is required to comply with legal obligations.
- Legitimate interest – processing supports a legitimate interest pursued by us.

3.1.2 Further, we collect and process social security numbers (CPR numbers) in accordance with section 11(2) of the Danish Data Protection Act.

3.1.3 If the processing is based on your consent, you may at any time withdraw your consent by contacting us.

4. TRANSFER OF PERSONAL DATA

4.1 We share or transfer your personal data to a country or territory outside the EU/EØS.

4.2 Each of the sub-processors outside of the EU/EØS ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

4.3 Separate data processing agreements have been entered into with each of the sub-processors based outside of the EU/EØS to ensure compliance with the GDPR.

4.4 We will not share your personal data with any third parties without your consent unless it is specifically stated or required by law that we do so.

5. PROFILING AND AUTOMATED DECISION MAKING

5.1 Our processing activities do not include profiling or automated decision-making.

6. BUSINESS TRANSFERS

6.1 In the event of an actual or contemplated transfer of our company or our assets, or if we discontinue our business or enter into bankruptcy proceedings, we will include data, including your personal information, among the assets transferred to any parties who acquire us or such assets may be the subject of review (due diligence) by such parties (or their representatives). You acknowledge that such transfers may occur and that any parties who acquire, or contemplate to acquire, us may, to the extent permitted by applicable law, continue to use your personal information according to this policy, which they will be required to assume as it is the basis for any ownership or use rights we have over such information.

7. USE OF PERSONAL DATA

7.1 We only process your personal data as stated in this privacy policy and we do not use your personal data for any other purpose than explicitly described above or communicated directly to you elsewhere.

7.2 We process your personal data in a lawful, fair, and transparent manner. The data we collect is solely used for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.



- 7.3 All use of your personal data is relevant and limited to what is necessary in relation to the purposes for which they are processed.

8. SECURITY

- 8.1 When we store and process personal data that we have received from you, we always take every step possible to store it in a secure manner. However, we cannot guarantee that your data is 100% secure as we cannot guarantee that the data will not be accessed or otherwise misused as a result of an unlawful act or similar. We do take all necessary precautions to keep your data safe. When you provide us access to or transfer personal data to us, you do so at your own risk.

- 8.2 The following security measures are in place to keep your data safe:

- Encryption of personal data in transit
- Encryption of personal data at rest
- Regular backups of personal data
- Use of managed hosting services from reputable cloud providers
- Internal policies & password protection

- 8.3 To further increase the level of security, we have “deletion policies” in place. Personal data is kept for a maximum period of 6 months after the purpose of the processing has ended.

9. ACCESS TO YOUR INFORMATION

9.1 Right to access

GDPR Article 15: You have the right to obtain a confirmation from us as to whether or not personal data concerning you is being processed, including information on the purpose-, categories-, recipients-, and time of storage of the processing.

9.2 Right to rectification

GDPR Article 16: If you figure out that the data that is being processed about you is inaccurate or incomplete, you have the right to get that data rectified. We will communicate any rectification or erasure of personal data to any recipient to whom the personal data has been originally disclosed unless it proves impossible according to Article 19.

9.3 Right to erasure

GDPR Article 17: You also have the right to get your personal data erased, if the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed. Please see Article 17 for the full list of reasons for your right to erasure.

9.4 Right to restriction of processing

GDPR Article 18: You have the right to restrict the processing of your personal data if it is (i) inaccurate; (ii) unlawful; (iii) the purpose of the processing has changed; or (iv) you have objected to the processing according to Article 21.

**9.5 Right to data portability**

GDPR Article 20: You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used, and machine-readable format. You can also request that we transmit your data to another party.

9.6 Right to object

GDPR Article 21: You have the right to object to the processing of your personal data if it is being used for profiling or direct marketing purposes.

10. SUB-PROCESSORS

10.1 We use data processors to be able to deliver our services and run our business. We have listed the various categories of handling, its purposes, and the supplier in the below table.

Category	Types of data	Sub-processors (or a similar and identifiable service)
Article 6 of GDPR and section 11(2) of the Danish Data Protection Act	User IP address	Cloudflare, Inc USA
Article 6 of GDPR and section 11(2) of the Danish Data Protection Act	Processing and storage of: User personal data Tenant personal data Vendor personal data	Salesforce, Inc (Heroku) EU
Article 6 of GDPR and section 11(2) of the Danish Data Protection Act	Processing and storage of: User personal data Tenant personal data Vendor personal data	Amazon Web Services, Inc. EU
Article 6 of GDPR and section 11(2) of the Danish Data Protection Act	Processing of: User personal data Tenant personal data Vendor personal data	Google, LLC USA
Article 6 of GDPR and section 11(2) of the Danish Data Protection Act	Processing of: User personal data Tenant personal data Vendor personal data	OpenAI, LLC USA
Article 6 of GDPR and section 11(2) of the Danish Data Protection Act	User IP address	Sentry EU
Article 6 of GDPR and section 11(2) of the Danish Data Protection Act	User IP address	SolarWinds Worldwide, LLC EU

11. CONTACT INFORMATION, REQUESTS & COMPLAINTS

11.1 If you want to exercise any of your above rights, please contact our data protection responsible:



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- 11.2 If you find that your personal data has been processed in a way that does not meet the requirements of the GDPR and if you want to file a complaint, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will guide you through the process. See contact information below:

Datatilsynet
Carl Jacobsens Vej 35
2500 Valby
Denmark

dt@datatilsynet.dk
+45 33 19 32 00