

PRIVACY POLICY

Apodius GmbH, (“Apodius” or “we” or “us”) respect your privacy. Apodius is committed to the safe and secure processing of personal data and compliance with applicable data protection law. We have implemented appropriate technical and organizational measures to protect your personal data against loss or unlawful access. The number of persons with access to your personal data is limited. Only individuals associated with Apodius that need to process your personal data in accordance with the purposes below will have access to your personal data.

The following describes how we process your personal data.

HOW WE PROCESS YOUR PERSONAL DATA

Fulfilling our contractual obligations towards your company, for example sending quotes, order administration, provision of products and services to your company, invoicing your company, responding to your service requests, etc.

How do we obtain your personal data	We obtain personal data from you when you register on our Web Sites, furnish our representatives with your business card, or when we obtain your data from representatives of your company.
Categories of personal data we process	Personal master data (key personal data); Contact data; Key contract data (Contractual/Legal Relationships, Contractual or Product Interest); Network and device identification.
The purposes of the processing	Fulfilling our contractual obligations towards your company, e.g., sending quotes, order administration, provision of products and services to your company, invoicing your company, responding to your service requests etc.
Legal basis for the processing	It is within the legitimate interest of Apodius and your company to process your personal data for the above noted purposes. We use your personal data for fulfilling our contractual obligations towards your company. The privacy impact of the processing is low, as Apodius contacts you in your professional capacity.
Recipients (or categories of recipients) of the personal data	We will share your personal data with companies within the Hexagon Group. We will also share your personal data with suppliers and business partners and legal agents which carry out services on our behalf such as customer relationship management solution providers and travel agents.
Retention period	We will retain your data for as long as the business relationship with your company exists and for as long as your employment with your company subsists. We will retain and use your data during the applicable statutory limitation periods and as necessary to comply with our legal obligations, resolve disputes and to enforce agreements.

Marketing/Prospecting:

How we have obtained your personal data	You provided your personal data through the use of our Web Sites (eg. registration form completion allowing the placement of cookies). We may have received your personal data when you supplied us with your business card, or we may have obtained your personal data from your company. Personal data may also be obtained from third party data augmentation services. You may have provided us with personal data over the telephone. If you have registered to attend an event with a third party provider, then we may obtain your personal data from that third party provider, where you have given your consent to such third party provider to supply your personal data to us.
Categories of personal data we process	Personal master data (key personal data); Contact data; Key contract data (Contractual/Legal Relationships, Contractual or Product Interest); Network and device identification.
The purposes of the processing	Informing you via any means (including via email, telephone, text message, social media, post, or in person) about our products, services, publications and events which we think may be of interest to you and your company, based on previous purchases and interest shown in Apodius products and services.
Legal basis for the processing	Unless we explicitly request your consent to process your personal data, we rely on Apodius and your company's legitimate interest to send you relevant marketing communications. The privacy impact of the processing of your personal data is low, as Apodius contacts you in your professional capacity. You can opt out of processing for direct marketing purposes by clicking on the "Unsubscribe" link situated within any marketing emails sent to you. You also have the right to object to the processing at any time by contacting Email: privacy.mi@hexagon.com . Where you withdraw your consent or unsubscribe (as applicable), we will retain certain personal data (only to the extent that it is absolutely required) on our "do not contact" list.
Recipients (or categories of recipients) of the personal data	We will share your personal data with companies within the Hexagon Group. We will also share your personal data with suppliers and business partners and legal agents that carry out services on our behalf such as marketing solution providers.
Retention period	We will process your personal data unless you opt out of the processing for direct marketing purposes.

Customers Testimonials, Comments and Reviews:

How we have obtained your personal data	We obtain your personal data through the completion of a release document which is available in hard copy and is also available online.
Categories of personal data we process	Contact details, job role and key personal data
The purposes of the processing	The processing is required for the purpose of providing reviews to our client base in support or otherwise, of our products, services and software.
Legal basis for the processing	We have obtained your prior, informed consent to the processing.
Recipients (or categories of recipients) of the personal data	Individuals who access any marketing channel from either within Apodius or outside of Apodius.
Retention period	For as long as is necessary unless you withdraw your consent to the processing.

**Where Apodius has sought your consent to the processing of your personal data then you can withdraw your consent at any time by contacting Email: privacy.mi@hexagon.com.

TRANSFER OF YOUR PERSONAL DATA TO THIRD COUNTRIES

Your personal data may be transferred to a country outside of EU/EEA such as Canada (commercial organizations), New Zealand, Switzerland, and US (limited to the Privacy Shield framework)] which offer similar level of protection as within the EU/EEA. The transfer is based on the legal basis outlined in [HOW WE PROCESS YOUR PERSONAL DATA](#) and is for the purpose outlined in [HOW WE PROCESS YOUR PERSONAL DATA](#). The transfer to these countries is based on the adequacy decision of the European Commission.

Your personal data may be transferred to a country outside of EU/EEA such as Australia, Brazil, Chile, China, Colombia, Hong Kong, India, Indonesia, Japan, Malaysia, Mexico, Peru, Philippines, Russia, Singapore, South Africa, South Korea, Taiwan, Thailand, UAE, United States, Venezuela, which may have a lower level of protection than within the EU/EEA. The transfer is based on the legal basis outlined in [HOW WE PROCESS YOUR PERSONAL DATA](#) and is for the purpose outlined in [HOW WE PROCESS YOUR PERSONAL DATA](#). When transferring personal data to these countries, Apodius uses standard contractual clauses approved by the European Commission to ensure a sufficient level of protection of your personal data. The standard contractual clauses can be found via the following link: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.]

WHAT ARE YOUR RIGHTS?

You are entitled to know what personal data we are processing about you. You have the right to request access to your personal data and you can request that we provide a copy of such data to you. You are entitled to have incorrect personal data regarding you corrected, and in some cases you may request that we delete your personal data. You also have the right to object to certain processing of your personal data, and request that the processing of your personal data be limited. Limitation or deletion of your personal data may result in Apodius not being able to fulfil its commitments to you. You also have the right to request data portability, where your personal data would be extracted in a machine-readable format and transferred to another controller. Apodius may not always be obliged to comply with a request from you for deletion, restriction, objection or data portability. Additional circumstances such as exercising the right of freedom of expression and information, compliance with a legal obligation which requires processing by EU or Member State law or processing for establishment, exercise or defence of legal claims can justify further processing by Apodius. Apodius will assess the eligibility of your request and inform you about Apodius decision and reasoning.

Where you have given us your consent to process your personal data, you can withdraw your consent at any time and without justification. Where you withdraw your consent, certain personal data (only to the extent that it is absolutely required), will be retained on our “do not contact” list.

If you have questions regarding how we process Personal Data concerning you, you are most welcome to contact us at Email: privacy.mi@hexagon.com.

OBJECTIONS AND COMPLAINTS

If you have any objections or complaints with the way in which we process your personal data, you have the right to lodge a complaint with the relevant data protection supervisory authority, where the applicable laws provide for such remedy.

IDENTITY OF THE PRIVACY OFFICER

The Apodius Privacy Officer can be contacted at: privacy.mi@hexagon.com

IDENTITY OF THE CONTROLLER

Hexagon AB, Swedish Company Registration Number 556190-4771, Lilla Bantorget 15, P.O. Box 3692, SE-103 59 Stockholm, Sweden (hexagon.com), its subsidiaries and controlled joint ventures are the controller(s) of your personal data.

Apodius operates within a matrix/division structure and utilises data processing tools shared between multiple Hexagon Group entities. It follows that your location and your business relationship with Apodius are essential in determining the relevant controller(s) in terms of the processing of your personal data within the Hexagon Group.

Upon your request to the Privacy Officer, you will be provided with full details of the relevant controller(s) within the Hexagon Group which is/are responsible for the processing of your personal data. We will provide the name and the contact details of any data protection officer where appointed by the applicable controller.

INFORMATION REGARDING COOKIES

When you view this Web Site, or any other hyperlinked Web Site, we may store some information on your local computer in the form of a "cookie", which allows us to adjust our Web Site to better match your preferences. Cookies are also used to collect general usage and volume statistical information that does not include personal information.

A cookie is a small text file, which the Web Site you are visiting saves on your local computer. Cookies are used by many Web Sites to give visitors access to a range of various functions. The information contained in the cookie can be used to monitor a user's browsing behaviour.

There are two types of cookies: persistent cookies and session cookies.

Persistent cookies save a file for an extended period on your computer and are used, for example, with functions that describe what information is new since you last visited the particular Web Site. Session cookies are stored temporarily in your computer's memory while you are visiting the Web Site and browsing a page, and are used, for example, to determine what language you have chosen. Session cookies are not stored in your computer for an extended period, but are deleted when you close your browser.

Apodius uses both types of cookies for the following purposes: (i) to collect visitor statistics; (ii) to enable the user to remain logged in to e.g. the subscription service on our Web Site; (iii) to remember user preferences, e.g. language, font size, etc.; and (iv) to remember user agent properties, e.g. screen resolution, connection speed, etc.

Third-Party Cookies

The use of cookies by our partners, affiliates, tracking utility companies, and service providers is not covered by our Privacy Policy. We do not have access to or control over these cookies. Our partners, affiliates, tracking utility companies, and service providers may use cookies to improve your Web Site experience.

Behavioral Targeting/Re-Targeting

We partner with a third party advertising network to either display advertising on our Web Site or to manage our advertising on other Web Sites. Our ad network partner uses cookies and web beacons to collect non-personally identifiable information about your activities on this and other Web Sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by contacting the third-party advertising network. Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

Google Analytics

This Web Site uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", text files that are stored on your computer to help analyze the use of the Web Site. The information generated by the cookie about your use of this Web Site (including your IP address) might be sent to a Google server in the U.S. and stored there. Under the authority of Apodius, Google will use this information to evaluate your use of our Web Site, compile reports on Web Site activity for Apodius and provide other Web Site activity and internet related services for Apodius. In addition, Google may also transfer this information to third parties if required by law or if third parties process the information on Google's behalf. To see details on what Google Analytics collects and how it is used please refer to <http://www.google.com/intl/en/analytics/privacyoverview.html>.

You may refuse the use of cookies by changing the settings on your browser. Alternatively, if available for your browser, you can use the "Google Analytics Opt-out Browser Add-on" available at <http://tools.google.com/dlpage/gaoptout?hl=en>. We would point out, however, that if you refuse the use of cookies, you may not be able to use all the features of this Web Site.

Web Beacons

Our Web Site contains electronic images known as web beacons (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyse how our Web Site is used, and may be used in some of our emails to let us know which emails and links have been opened by recipients. This allows us to gauge the effectiveness of our customer communications and marketing campaigns.

Our third-party partners also employ clear gifs (a.k.a. web beacons/web bugs), images, and scripts that help them better manage content on our Web Site. We do not tie the information gathered to our customers' or users' personally identifiable information.

How to Avoid Cookies

You can set your browser to block cookies. The procedure for blocking cookies will depend on what browser you are using. Access 'Help' or the appropriate menu in your browser for instructions. You can also remove persistent cookies by following directions provided in your Internet browser's "help" file. If you reject or remove cookies, you may still use our Web Site, but your ability to use some areas of our Web Site, such as contests or surveys, will be limited.

Links to Other Web Sites

Our Web Site includes links to other Web Sites whose privacy practices may differ from those described in this Privacy Policy. If you submit personal information to any of those third party Web Sites, your information is governed by their privacy policies. We encourage you to carefully read the Privacy Policy of any Web Site you visit.

Social Media Widgets

Our Web Site includes social media features, such as the “Facebook” button, and widgets, such as the “Share This” button or interactive mini-programs that run on our Web Site. These features and widgets may collect your IP address, which page(s) you are visiting on our Web Site, and may set a cookie to enable the feature or widget to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Web Site. Your interactions with these features and widgets are governed by the privacy policy of the company providing it.

This Privacy Policy was last amended on 18.06.2018.