



Privacy Policy

Version 1 - Approved by Alexander Sagen



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1. Scope and acceptance

This Privacy Policy applies to all business processes in Netto and to all Netto websites, domains, mobile solutions, cloud services and communities as well as Netto- branded websites and third-party social networks (e.g. Facebook) (Netto Sites). Any specific appendices for Netto System will be found in the Terms & Conditions or equivalent for the service in question.

The Privacy Policy provides information about data processing carried out by Netto when Netto determines the purpose and means of the processing (Netto as data controller), and data processing we do on behalf of our Customers based on their instructions (the Customer as data controller and Netto as data processor).

Personal Data is any information that can directly or indirectly identify a living individual, such as an email address, street address, phone number or IP-address. Processing your Personal Data is necessary for us to serve you or our Customers. By providing us with your Personal Data, you accept the practices and terms described in this Privacy Policy. Please do not use Netto Sites or provide your Personal Data if you do not agree.

2. Whose data we process

Netto processes data about contact persons and software users among our Customers, including persons representing potentially new Customers that approach us via Netto Sites or other channels. Our policy in these regards is to be found in the data controller section. We also process data about our Customers' employees and other persons' data of which the Customer controls. Our policy in these regards is to be found in the data processor section. In this policy data subjects may also be referred to as persons or you.

3. Netto as a data controller

When Netto determines the purpose and means of data processing we act as a data controller. Netto controls Personal Data that we collect in the context of you being employed by a Customer that has or may have a business relation to Netto, or you declare that you want to receive information from us based on your own or your employer's interests. When you represent a Customer of Netto, your rights are the same as if you were a private person only representing yourself.

Why do we collect and use personal data?

To manage our Customer relations in general and to meet our Customer commitments, Netto requires some information about you in your role as Customer contact person or user of a Netto System. We also collect data about suppliers and partners for the following purposes:

1. Perform deliveries in accordance with a customer agreement.
2. Offer support to users of our services.
3. Improve the quality of Netto System and Netto Sites.
4. Detect and prevent security threats and perform maintenance and debugging.
5. Prevent abuse of our software and services.
6. Communicate information that is relevant for our deliveries and our customer relations in general.
7. Process orders, invoicing, payments and other financial follow up of Customers.
8. Payment of services purchased through Netto Sites.

Processing according to the above listed purposes (1 to 8) is necessary for us to manage our customer relations. Therefore, Netto does not, as additional ground ask for your consent to process your Personal Data. We do not consider that the processing disadvantages you in any way. We will also collect information about you as a contact person or user of a service. We collect and use



Personal Data mainly to perform direct sales, direct marketing and customer service, including:

1. To manage your access to our web-based services (Netto System).
2. Send you marketing communications which you have requested. These may include information about our products and services, events, activities, and promotions of our associated partners' products and services. This communication is subscription based and requires your consent.
3. Send you information about the products and services that you have purchased from us or are related to the services you are already using.
4. Perform direct sales activities in cases where legitimate and mutual interest is established.
5. Provide you content and venue details on a webinar or event you signed up for.
6. Reply to a "Contact me" or other web forms you have completed on one of our Netto websites (e.g. to download a whitepaper).

The basis for Netto's processing of Personal Data for the above purposes (I) is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. Your consent may be given freely on Netto Sites when applicable. Please note that the collection of individual Personal Data is required to gain user access to many of our programs and services and to access the information you have requested.

To protect your security and ours we will also store information about you when you visit our premises. You will be informed of your rights in this context when you register in our electronic visitor system.

When do we collect your personal data?

In general, Netto collects data directly from you or other persons linked to the Customer company where you are employed. These persons may be a manager or colleague. If the Customer you work for purchases Netto System via a Netto partner company, we may collect information about you from the partner company.

We collect your Personal Data when you interact with us in person, through correspondence, by phone, by social media, or through our websites.

We will also, with your consent, use cookies and other tracking technology when you use Netto Sites to optimize your experience of these. Please see the paragraph describing automatic data collection tools for more information about these technologies and your rights in this context.

In some cases, we may also collect information about you from other legitimate sources if you have given your consent that the party collecting the Personal Data may share this with others. These sources may be third-party data aggregators, Netto's marketing partners, public sources or third-party social networks. Netto will be able to combine Personal Data about you obtained from one source with data obtained from another source. This gives us a more complete picture of you as a contact person, which also gives us the possibility of serving you in a more relevant way with a greater degree of personalization.

4. Automatic data collection tools

This section is only applicable to the Netto website www.netto.eco and country specific versions of the website. Digital marketing software cookies (incl. Google) are never used for any services provided to customers where Netto is a processor of personal data.

Netto uses a variety of technologies to collect information about your movements on the web as well as interest and preferences you freely have made available.

Netto uses digital marketing software that uses cookies in order to recognize a return visitor as a unique user. The cookies placed by this software are readable only by the vendor of the software, and cookies cannot access, read or modify any other data on your computer. We do link the information we store in cookies to any personally identifiable information you submit while on our site.



5. Google

Google Analytics: This cookie allows us to see information on user Website activities including, but not limited to page views, source and time spent on a Website. The information is depersonalized and is displayed as numbers, meaning it cannot be tracked back to individuals. This will help to protect your privacy. Using Google Analytics, we can see what content is popular on our Website, and strive to give you more of the things you enjoy reading and watching.

Google Analytics Remarketing: Places cookies on your computer which means that after you leave our website, Google can show you advertisements about Netto that you might be interested in, based on your previous behavior on our website. This information is not personally identifiable.

Google AdWords: By using Google AdWords code, we can see which pages helped lead to contact form submissions. This allows us to make better use of our paid search budget. This information is not personally identifiable.

Google AdWords Remarketing: Places cookies on your computer which means that after you leave our website Google can show you advertisements about Netto that you might be interested in, based on your previous behavior on our website. This information is not personally identifiable.

You can prevent the information generated by the Google cookie about your use of our Sites from being collected and processed by Google in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser. This Add-on is available at <https://tools.google.com/dlpage/gaoptout>.

6. Posthog Analytics

We use PostHog, an analytics service, to understand how our users interact with the Netto platform and to improve functionality, performance, and usability. PostHog is provided by PostHog Inc. and is hosted on servers located in the EU.

PostHog uses cookies and similar technologies to collect information about how users use our service. We only activate PostHog after you have provided consent via our cookie banner, and you may withdraw your consent at any time through your cookie settings.

What data is collected

When PostHog is enabled, we may collect and process the following types of personal data:

- Account identifiers such as your email address and internal user ID
- Usage and interaction data (e.g. pages visited, features used, clicks, events)
- Session and device information (e.g. IP address, browser type, timestamps)
- Session replay data, which may include visual recordings of your interactions with the application such as mouse movements, scrolling, and page rendering

We do not intentionally collect special category personal data through PostHog.

Purpose of processing

We use PostHog for the following purposes:

- To understand how users use our platform



- To monitor and improve product performance and usability
- To diagnose and fix technical issues
- To analyse feature adoption
- To support users and investigate reported problems

Session replay is used specifically for troubleshooting and usability improvements and is not used for marketing, advertising, or employee monitoring.

Lawful basis

The processing of personal data through PostHog is based on our legitimate interests under Article 6(1)(f) GDPR. These legitimate interests include operating, securing, maintaining, and improving the functionality, performance, and usability of our platform, as well as diagnosing technical issues and providing effective customer support.

We have carried out an assessment to ensure that our legitimate interests are not overridden by your rights and freedoms. This includes applying data minimisation, strict access controls, limited retention periods, and technical safeguards, particularly for session replay functionality.

Although this processing is based on legitimate interests, we provide a cookie banner and cookie settings to give you transparency and control. You may object to this processing at any time under Article 21 GDPR, including by disabling analytics cookies in your cookie settings. When you object, PostHog analytics and session replay will no longer be activated.

Session replay safeguards

Because session replay may capture detailed interaction data, we apply strict safeguards:

- Form inputs are masked by default
- Sensitive fields such as passwords, tokens, and payment information are blocked from recording
- Replay is limited to relevant parts of the application
- Replay data is retained for a limited period
- Access is restricted to authorised personnel only

Sharing and processing

PostHog acts as a data processor on our behalf. We have entered into a Data Processing Agreement with PostHog to ensure your data is protected in accordance with GDPR. Data is processed within the EU and is not used by PostHog for its own purposes.

We do not sell analytics data or share it with third parties for advertising purposes.

Retention

Analytics data is stored only for as long as necessary to fulfil the purposes described above and in accordance with our retention policies. Session replay data is stored for a shorter, limited period compared to general analytics events.

Your choices and rights

You can:

- Accept or reject analytics cookies via our cookie banner



- Withdraw your consent at any time through cookie settings
- Object to processing based on legitimate interests
- Request access to or deletion of your personal data

More information about your rights is available in the **“Your rights”** section of this Privacy Policy.

7. How to accept or reject cookies

There are several different ways in which you can accept or reject some or all cookies on our site. Some of the most common methods of doing so are described below.

You are welcome to block the use of some or all the cookies we use on our website. However, please be aware that doing so may have an impact on our site’s performance and its functionality or may even render some or all of it unusable.

You should also know that clearing all cookies from your browser will also delete any cookies that are storing your preferences, for example, whether you have accepted cookies on a website or any cookies that are blocking other cookies.

You can find more detailed information about cookies and changing your browser settings by visiting www.allaboutcookies.org

8. Accepting or rejecting cookies

Browser settings

You can accept or reject some or all cookies (for example, blocking all third-party cookies) by changing your browser settings. If you need assistance to do this, the links below provide information on how to adjust your browser settings for some of the most commonly used web browsers:

- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/delete-browsing-search-download-history-firefox?redirectlocale=en-US&redirectslug=Clear+Recent+History>
- Microsoft Internet Explorer: <https://support.microsoft.com/en-us/help/278835/how-to-delete-cookie-files-in-internet-explorer>
- Apple Safari: https://support.apple.com/kb/PH5042?locale=en_US

Some browsers, such as Chrome and Firefox, allow you to adjust your settings to browse in ‘incognito’ mode, limiting the amount of data placed on your machine and automatically deleting any persistent cookies placed on your device when you finish your browsing session. There are also many third-party applications which you can add to your browser to block or manage cookies.

Clearing existing cookies

To clear cookies that have already been placed on your browser, you should select the option to clear your browsing history and ensure that the option to delete or clear cookies is included when you do so.

Google Ad settings

You can manage and opt out of personalization of advertisements by Google by visiting Google’s ad settings page here and by:

- unticking the button entitled ‘Also use Google Account activity and information to personalize ads on these websites and apps and store that data in your Google Account’; and
- switching the ‘Ads Personalization’ setting off (i.e. by ensuring the switch at the top of the



page is set to the left/gray and not the right/blue).

Alternatively, you can install a free browser plugin here:
<https://support.google.com/ads/answer/7395996>.

Google Analytics Opt-out Browser Add-on

You can opt out of Google Analytics tracking by installing the browser add-on which is available here:
<https://tools.google.com/dlpage/gaoptout>.

9. What personal data we process

The type of data that Netto processes about you may be:

- Your own and the Customer's contact details such as name, telephone number and email.
- Employment information about you at the customer company such as job title, position including preferences and interests in professional context.
- Feedback, comments or questions about Netto as a supplier, or concerning our services.
- Photos or video of you recorded at our premises.
- Content you have uploaded such as photos and videos.
- Unique user information such as login ID, username, password and email.
- Financial information such as credit card information.
- Traffic information as provided by your web browser such as browser type, language and the address of the website from which you arrived and other traffic information such as IP address.
- Clickstream behavior such as which links you click and when.
- Other Personal Data contained in your profile on third-party social networks (Facebook etc.).

We may also in some cases compare a collected IP address with a geographic map service to derive your general location.

If you make a post, comment or similar on any public forum or Netto Site, such information can be read and used by anyone with access to the site and used for purposes over which neither Netto nor you have control. Netto is not responsible for any information you submit on such forums or Netto Sites. Netto will not post any comment, testimonial or similar made by you without your prior consent.

How we share your personal data

- Netto shares your personal data within the organization to better serve you as a customer or interested party of us.
- Netto does not share your personal data with third parties who intend to use the data for marketing purposes if you have not given your consent to this.
- Netto may share your personal data with third parties for other purposes but only in the following contexts.

Business partners

Netto may share your personal information with our partners in the event this is legitimate from a business perspective. For example, if you purchase a service on behalf of your employer that we provide through one of our certified partners.

Public Authorities

The police and other authorities may demand the handover of personal information from Netto. In these cases, Netto will only hand over the data if there is a court order to do so.

M&A

In connection with mergers, acquisitions, investments or divestiture of all or parts of Netto's business,



the acquiring entity as well as its consultants will obtain access to data managed by Netto. The acquiring entity and its consultants will enter into a NDA with Netto, which will also cover potential disclosure of Personal Data.

10. Your rights

Access and rectification

You have the right to request a copy of your Personal Data. You may send us a request for this. You also have the right to request that Netto corrects any inaccuracies in your Personal Data. If you have an account with Netto for a Netto Site, this can usually be done through the appropriate “your account” or “your profile” section(s) on the Netto Site (if available) or inside your Netto System. To manage subscription settings for Netto Newsletters, please click the “Manage my subscription” link at the bottom of the emails you receive. Alternatively, you can send us a request to rectify your data.

Right to erasure (‘right to be forgotten’)

If you no longer have any business with Netto, you can send us a request to delete your data.

Right to opt-out of marketing communications

You have the right to opt-out of receiving marketing communications from Netto and can do so by:

- following the instructions for opt-out in the relevant marketing communication, or
- contacting us via email at trust@netto.eco

Please note that even if you opt-out from receiving marketing communications, you may still receive administrative communications from Netto, such as order confirmations and notifications about your activities (e.g. account confirmations and password changes).

11. Data security and retention

Netto takes the trust you place in us seriously. Netto is committed to prevent unauthorized access, disclosure or other deviant processing of your data. Further, Netto is committed to ensure proper use of the information, to maintain data integrity and to secure data availability. As part of our commitment, we utilize reasonable and appropriate physical, technical, and administrative procedures and measures to safeguard the information we collect and process.

Please note that these protections do not apply to the Personal Data that you choose to share in public areas such as community websites.

12. How long we store your personal data

Netto will only retain your Personal Data for as long as necessary for the stated purpose, while also considering our need to answer queries or resolve problems and to comply with legal requirements under applicable laws.

This means that we may retain your Personal Data for a reasonable period after your last interaction with us. When the Personal Data that we collect is no longer required in this way, we destroy or delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymised.

13. Netto as a data processor

Netto provides different services to our Customers. These services involve processing of the Customers’ data and may include processing of Personal Data. The purpose of this processing is determined by our Customers and not by Netto. The Customer is then the data controller for the data subject’s data. Netto does in such cases act as data processor and process the data on behalf of and



according to instructions given by the Customer. When acting as data processor, Netto is in accordance with General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) committed to enter into a data processing agreement (DPA) with the Customer. The Customer has agreed and guaranteed that:

- The Customer is the owner of or otherwise has the right to transfer the data to Netto for processing and has the responsibility for the accuracy, integrity, content, reliability and legality of the Personal Data.
- It is the Customer's duty as data controller to notify, to the extent required by applicable law, the relevant supervisory authorities and/or the data subject in the event of any breach or unauthorized disclosure of Personal Data.
- Customer complies with applicable legal requirements for privacy, data protection, and confidentiality of communications related to its use of Netto System.

14. Customer Data Processing

When acting as a data processor, Netto is responsible for providing technical and organizational security measures to safeguard your privacy on behalf of our Customer – the data controller.

As data processor, Netto will not process Personal Data in any other manner or for any other purpose than authorized in the agreement with the data controller. Customer Data will be used only to provide Customer the Netto System. This may include troubleshooting aimed at preventing, detecting and repairing problems affecting the operation of the Netto System and the improvement of features that involve the detection of, and protection against, emerging and evolving threats to End-Users (such as malware or spam).

Data subjects having questions, comments, claims or any other issues regarding their Personal Data that Netto is data processor for, must submit these to the data controller. As a data processor, Netto will not give any data subjects access to their Personal Data without instructions given by the data controller to do so.

If governmental authorities or the police request disclosure of Personal Data, Netto will redirect the request to the data controller. As part of this effort, Netto may provide Customer's basic contact information to the contacting agency. Netto will provide non-public information about internal systems and routines for data processing to Customers and collaboration partners upon request and NDA.

15. Customer Data Processing Locations

Netto uses Amazon Web Services EU based Data Centers in Ireland.

16. Customer Data – Individuals' Rights

The GDPR provides the following rights for individuals:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

For the Term of the Agreement for the Netto System, Netto will, as necessary under General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), either:



1. provide Customer with the ability to safely access, correct, delete, or download Customer Data, or
2. make such access, corrections, deletions, or download on Customer's behalf.

17. Sub-Processors

Netto may hire other companies to provide limited services on its behalf, such as providing specific modules or extensions to the Services. Any such Sub-Processor will be permitted to obtain Customer Data only to deliver the Services Netto has retained them to provide, and they are prohibited from using Customer Data for any other purpose. Netto remains responsible for its Sub-Processors compliance with the obligations of the Agreement. Any Sub-Processors to whom Netto transfers Customer Data will have entered into written agreements with Netto requiring that the Sub-Processor provides at least the same level of privacy protection with respect to Personal Data received from Netto as is required by the relevant General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) principles.

18. Transfer of Customer Data

Customer Data that Netto processes on Customer's behalf may be transferred to and stored and processed in Norway or any other country within EU/EEA or [approved country](#) in which Netto or its Affiliates or Sub-Processors maintain facilities. Customer appoints Netto to perform any such transfer of Customer Data to any such country and to store and process Customer Data in order to provide the Netto System.

Netto will not transfer to any third-party (not even for storage purposes) Personal Data Customer provides to Netto through the use of the Netto System unless agreed upon in the Agreement between Customer and Netto.

19. Netto Personnel

Netto personnel will not process Customer Data without authorization. Netto personnel are obligated to maintain the confidentiality of any Customer Data and this obligation continues even after their engagement ends.

Netto stores your data in secure operating environments that are only accessible to Netto employees and Sub-Processors on a need-to-know basis. Netto also follows generally accepted industry standards in this respect.

End of Privacy Policy. For version history, please see the next page.



Version history

Version	Log	Date
1 Previous	Policy version approved by Alexander Sagen	01 Jan, 2024
2 Current	Policy version approved by Alexander Sagen	22 Jan, 2026