

Gamified Learning Services

– Privacy policy

When you use the Gamified Learning Services (the "GLS") we will process a number of personal data about you as an employee of the public authority or the private enterprise that is our customer. The same applies where you, as the owner of a private enterprise, use the GLS or if you download our free demo version of the GLS. In this privacy policy, you can read more about our processing of your personal data in connection with your use of the GLS. "Personal data" means any information relating to an identified or identifiable natural person. In other words, any information that can be traced directly or indirectly to you.

1. USE OF OUR GLS

The GLS is developed for the purpose of creating new and fun ways for employees in public organisations or private enterprises to play entertaining and educational games to support fast and engaging training in multiple domains – primarily areas where awareness must be transformed into changed behaviour. The game therefore serves to help your employer in the training of you and your colleagues and at the same time turn the training of you as an employee into a game.

Data derived from participating in Games like points and scores are available for all in the same organization using the GLS and will depending on the competition dimensions defined. The game is designed so that your employer cannot see whether you, individually, answer the questions in the games correctly or incorrectly, but only aggregated points earned, and degree of participation.

The GLS is therefore intended to provide you with a good and educational experience and at the same time help your organisation comply with applicable law.

2. WE ARE DATA CONTROLLERS – HOW TO CONTACT US

Implement Consulting Group

Strandvejen 54

DK-2900 Hellerup

CVR no. (business reg. no.): 32767788

Tel.: +45 45 86 79 00

E-mail: complayance@implement.dk

Implement Consulting Group are data controllers for the processing of your personal data in connection with the operation and improvement of the games in the GLS and the administration of the GLS contact point for the users of the GLS.

If you wish to exercise your rights or otherwise have questions in regard to the use of the GLS, you should therefore contact Implement Consulting Group at the above contact details.

As for the processing of personal data for statistical purposes in connection with reporting on the operation of the games at the customers (your employer), we act as data processors on behalf of our customers. In this case, your employer will be the data controller.

3. WHICH PERSONAL DATA DO WE PROCESS ABOUT YOU?

As data controller, we process the following general personal data about you in connection with your use of the GLS, that is, when you play the games in the GLS:

- Name
- E-mail address
- Firm (place of work) and division
- Information about the games you have played, including completed and initiated games, the duration of the games, and your score and total score
- Information that you enter in our forms, such as the GLS's "Suggest card" function or the "Suggest an improvement" function
- IP address information Login information
- Device ID
- MAC address

In addition, we process your picture (or your portrait, if applicable) if you choose, at your own discretion, to upload your picture in the GLS as your profile picture.

4. WHERE DO THE DATA COME FROM?

We receive personal data from you and your device when you enter them in and use the GLS, including when you create a profile and start playing.

In addition, we receive personal data about you (your place of work/division) from your employer in connection with the creation of your profile.

5. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

We first of all process your personal data as data controllers for the purpose of operating the game and for managing the use of the GLS. In addition, we process your personal data for statistical purposes in order to continually improve the gaming and learning experience. When we process your personal data for statistical purposes, the data will become aggregate data, which means that they will no longer be traceable to you (anonymised data). Finally, we process personal data about you in connection with the support to of the GLS, including when we contact you to process any support request you have created.

Our processing of your personal data is always limited to the personal data that are necessary for achieving those purposes.

6. THE LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

Below is a description of the legal basis of the processing of your personal data.

6.1 Storage of your data

Our storage of the GLS on your mobile device and access to data in the GLS takes place after we have obtained your consent in accordance with section 3(1) and (2) of the Executive Cookie Order (cookiebekendtgørelsen).

But we will in any case be entitled to store data or obtain access to data that are stored on your mobile device if the storage of or access to the data is necessary for operating the game on the GLS or if it takes place only for the purpose of transferring or facilitating the transfer of communication via an electronic communications network.

You are entitled to withdraw your consent at any time by uninstalling the GLS. If so, the GLS and data will be deleted on your mobile device, and we will no longer have access to your data concerning the game on your mobile device.

You can read more about cookies in our cookie policy

6.2 Pictures of you

When you create a profile on the GLS, you can choose to upload a picture of you. It is completely up to you whether you wish to upload a picture. If you choose to upload a picture of you, you consent at the same time to our processing of the picture in the GLS. We therefore process the pictures of the users on the basis of a consent in accordance with Article 6(1), point (a) of the General Data Protection Regulation.

You can choose to withdraw your consent at any time by deleting the uploaded picture or by asking us to do so. If you choose to withdraw your consent, your picture will be erased from the GLS and we will no longer process your picture.

Please note that this will not affect the lawfulness of our processing of your picture on the basis of your previous consent until the time of the withdrawal. The withdrawal of your consent will therefore only take effect at the time of the withdrawal.

6.3 Statistics

Where aggregate data are processed for statistical purposes, the data will be anonymised and, accordingly, personal data will no longer be processed. In the few incidents where it will be possible, for a limited period of time, to identify you, your personal data will be processed on the basis of the balancing of interests rule in Article 6(1), point (f) of the General Data Protection Regulation. The legitimate interests justifying the processing are our legitimate interests in developing and optimising the product, including to ensure a better use for customers in future.

6.4 Other processing

The legal basis for our other processing of your personal data follows from Article 6(1), point (b) of the General Data Protection Regulation on processing that is necessary for the performance of a contract as compared to Article 6(1), point (f) of the General Data Protection Regulation on processing that is necessary for the

purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. The legitimate interests justifying the processing are our legitimate interests in being able to perform the contract with our customers about the employees' and owners' operation of the comPLAYance GLS, including administration of the use of the GLS and continual improvement of the gaming experience.

As for the reporting of the operation of the games at our customers, our processing of personal data in this connection takes place as data processor in accordance with a written data processing agreement with our customers.

7. WHO HAS ACCESS TO YOUR DATA?

As described in section 1 above, we report information to your employer about the operation of the games. We entrust your personal data to our data processors. When our data processors process personal data on our behalf, this takes place on our instructions only. This implies, among other things, that they must not use the personal data for their own purposes.

In addition, we will not disclose your personal data to any recipients in third countries (i.e. countries outside the EU/EEA).

8. STORAGE AND ERASURE

Personal data that are processed about you in connection with operation of the games are erased or anonymised after one year, calculated from the date of your latest use of the GLS, including when the GLS is deleted. However, your picture will be erased not later than 24 hours after you have erased the picture in the GLS.

Personal data that are processed about you for statistical purposes will be aggregated and therefore generally presented in anonymised form. Your personal data, however, can be used for reporting on participation in games and development of players. In such reporting, your personal data will be anonymised after one year from the creation of the data concerned.

Personal data that are processed in connection with your consent to our contacting you concerning the GLS in connection with support will be erased or anonymised after two years, calculated from the latest use of your consent.

For all the processing mentioned above, we will only store your personal data for as long as there is a legitimate need. This implies, among other things, that your personal data will not be stored for any longer than is necessary, taking into account the purpose of the data collected.

9. YOUR RIGHTS

You have certain rights under the General Data Protection Regulation in relation to our processing of your personal data.

- You are entitled to access the data that we process about you and certain other information in this connection.

- You are entitled to demand that incorrect data about you be corrected. In special cases, you are entitled to demand that data about you be erased.
- You are in certain circumstances entitled to demand that the processing of your personal data be restricted.
- You are in certain circumstances entitled to data portability, which means the right to receive your personal data in a structured, commonly used and machine-readable format and to have those data transmitted from us to another data controller.

You are always entitled for reasons relating to your particular situation to object to our processing of your personal data where the processing is based on legitimate interests as stated above. If your objection is complied with, we will no longer be allowed to process your personal data unless we can demonstrate that our compelling legitimate interest overrides your interests, rights and freedoms, or that the processing is necessary for the establishment, exercise or defence of legal claims.

You can read more about your rights in the Danish Data Protection Agency's guide to the rights of data subjects, available at the website of the Danish Data Protection Agency.

You may contact us if you wish to exercise any of your rights as described above, if you wish to complain, or if you have any other questions in relation to our privacy policy by contacting:

Implement Consulting Group

Strandvejen 54

DK-2900 Hellerup

CVR no. (business reg. no.): 32767788

Tel.: +45 45 86 79 00

E-mail: compliance@implement.dk

10. CHANGES TO OUR PRIVACY POLICY AND LATEST UPDATE

Our privacy policy will be continually updated. The latest update is August 10. 2024.