

Sorama Portal Privacy Policy December 2022 version

This Privacy Statement explains what personal data Sorama collects and uses in the Sorama Portal and what Sorama does with this personal data.

In short:

- Sorama ensures confidential and careful handling of your personal data;
- You will be informed about the use by Sorama of your data;
- We guarantee your privacy.
- This Privacy Statement only reflects Sorama's policy and does not cover any sites linked to the Sorama site.

Who is the controller?

Sorama BV (hereinafter referred to as: 'Sorama'), located at Achtseweg Zuid 153H, Eindhoven, The Netherlands, is the controller for the processing of personal data.

Personal- and company data that we process

Sorama processes personal and company data that you provide or share with a Sorama stakeholder. This data is used to manage, personalize and optimize the Sorama Portal.

Personal data that we process are:

- Username
- Password
- ID
- First and last name
- Email address
- Company
- Phone number
- Date and time for:
 - password changed and failures;
 - profile creation;
 - last login;
 - lockout, and the end of the lockout;
 - Other personal data that you have actively provided to us via correspondence or telephone, such as participation in an activity or a question, to the Sorama Support Team.

Company data that we process are:

- Company name
- ID

Why do we need data?

Sorama processes personal data for the Sorama Portal to provide you with the best possible service. Think of:

- Personalize the Sorama Portal
 - Showing a personalized welcome
 - Using personal information for helpdesk questions
 - Showing the amount of storage used
- Optimize the Sorama Portal
 - Create personalized tours
 - Collect user information for questionnaires

How long do we keep personal data?

Sorama does not store personal data for longer than is strictly necessary to realize the purposes for which this data is collected.

Sharing with others

Sorama Portal shares personal data with a limited number of other parties listed below. These parties receive limited personal data so we can provide the best experience.

Chameleon

We use Chameleon to help our users better learn our web application, using interactive product tours built with Chameleon. Chameleon provides an editor to build these tours, and also delivers them inside our application during their interaction. Chameleon does not automatically collect any personally identifiable information, and uses data we proactively send to Chameleon for the purposes of helping us deliver the right guidance to the right user at the right time.

To learn more about Chameleon's security practices, cookie policies, and regulatory compliance, please visit <https://www.chameleon.io/security>.

Data Chameleon receives:

- User ID

Microsoft Azure

We use Microsoft Azure as our cloud computing solution. This allows us to build, manage, and deploy our cloud applications and services. All data shared with our applications and services will be stored in a Microsoft Azure Database. This allows us to provide companies and users access to our cloud applications and services and track their respective usages.

To learn more about Microsoft Azure's security practices, cookie policies, and regulatory compliance, please visit <https://azure.microsoft.com/en-us/support/legal/>.

Data Microsoft Azure receives:

- Username
- Password
- ID
- First and last name
- Email address
- Company
- Phone number
- Date and time for:
 - password changed and failures;
 - profile creation;
 - last login;
 - lock out, and the end of the lock out;

What data is collected on our website and what happens to your data?

The information you provide

When using the Sorama Portal, we use data you upload to our Portal so you can analyze them using the Sorama portal. Besides we use personal information you provide to identify you as a user of our Portal which gives you access to our measurement and analyze possibilities.

Cookies

The website portal.sorama.eu places cookies. Cookies are small text files that are placed on a PC, tablet or mobile phone by an internet page. These cookies are used to make the website function better and to monitor the web visit. In this way Sorama can check how many people have visited the website in a certain period. Sorama cannot trace this data back to a PC or individual.

Why cookies?

Web pages have no memory. A visitor who surfs from page to page within a website is always seen by the web server as a new visitor. Cookies ensure that a website continues to recognize your browser.

On what legal grounds do we use your data?

Sorama uses the personal data for the purposes described above and only processes your personal data if you have given permission for it, it is necessary for the execution of the agreement, because you and we have an interest in it that outweighs the use of your data, or because it is required by law.

What rights do you have?

Sorama believes it is important that you can properly exercise the rights you have under the law. That is why it is very easy to contact us by sending an email to info@sorama.eu. Sorama will respond to your request as soon as possible, but at the latest within four weeks.

You can exercise the following rights:

- The right of access: you have the right to inspect which of your personal data we process;
- The right of correction: if the personal data that we process about you is incorrect, you have the right to have it adjusted;
- The right to erasure: if we no longer need your personal data for the purpose for which we received it, you have the right to ask us to delete it. There are a number of exceptions to this, such as our obligation to keep certain data for, for example, the tax authorities;
- The right of limitation: during the period that we are in the process of determining whether your data should be rectified, determining the (un)lawfulness of data processing, determining whether data should be deleted or you have objected to the processing, you have the right to request the restriction of processing;
- The right of data portability: at your request, we must transfer all personal data that we have about you to you or another organization of your choice. You can only exercise this right if the data is processed on the basis of permission or agreement;
- The right to object: if we process data on the basis of legitimate interest or public interest, it is possible to object, after which a weighing of interests will follow. In the case of direct marketing, you always have the right to object.

Security

Sorama takes the protection of personal data seriously. We take appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and/or unauthorized modification. If you have the impression that your personal data is not properly secured or there are indications of abuse, don't hesitate to get in touch with us via info@sorama.eu.

Submit a complaint to the competent authority: Dutch Data Protection Authority

Sorama finds it important to have satisfied members, clients and stakeholders. Even though we do everything we can to achieve this, it is possible that you are not satisfied. It is possible to submit a complaint to the Dutch Data Protection Authority when it comes to the protection of personal data.