

Privacy Policy

This privacy policy (the “**Policy**”) has been compiled to better serve those who are concerned with how their personal data is being used, hereunder to inform you (“**You**” or “**Your**”) of Your rights as well as our policies and procedures regarding processing of the personal data we may utilise from You through our facilitation of our service. Please read our Policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle Your personal data.

Where the words “**We**”, “**Us**” or “**Our**” are used in this Policy, this refers to Mohawk Analytics AS, a limited liability company incorporated under the laws of Norway, bearing the Norwegian organisation no. 996 414 914 – and having its registered address at Dønvika 1, 3780 Skåtøy, Norway. Please note that We are the data controller of Your personal data.

For the purposes of this Policy, the term “**Service**” means access to the Mohawk Portal, a software service delivered online to Our customers (“**Customers**”), including upgrades and updates that We may provide, if applicable.

We designed this Policy in a modern and reader-friendly format, so that You don't have to read all of it to find the answer to Your specific question. Please click on any of the topics below to be directed to the relevant information.

1. [When do We collect Personal Data?](#)
2. [What are your rights?](#)
3. [Our Policy regarding Children](#)
4. [What is Personal Data?](#)
5. [Legal Basis for the Processing of Personal Data](#)
6. [What kind of Personal Data do We process?](#)
7. [Why do We collect Personal Data?](#)
8. [For how long do We keep Your Personal Data?](#)
9. [Do We disclose Personal Data to third parties?](#)
10. [Security](#)
11. [International Transfer](#)
12. [Accessing, Amending or Deleting Your Personal Data](#)
13. [Contact & Complaint](#)

1. WHEN DO WE COLLECT PERSONAL DATA?

- 1.1 We may collect personal data from You when You place an ad in a classified's website. To find out whether we have collected such personal data from You, You may contact Us as prescribed in Section 13.

2. WHAT ARE YOUR RIGHTS?

- 2.1 As a data subject, You have the following rights:
 - a) **Access:** You may request a copy of Your personal data that We process.
 - b) **Data portability:** You may request to obtain the personal data that You have provided to Us or to have said data transferred to a third party in a structured, commonly used and machine-readable format.
 - c) **Erasure:** You may demand that We erase all of Your personal data, unless We are required by law to keep the data for a certain period of time. You can find Our forms necessary to exercise the abovementioned rights on our website mohawkanalytics.com: [access](#), [rectification](#) and [erasure](#).
 - d) **Information:** You are entitled to receive information concerning which categories of Your personal data that We process and how they are processed.

- e) **Objection:** You may object to Our use of Your personal data for the purpose of direct marketing, including profiling for direct marketing purposes. You may also object to being subject to decision based solely on automated processing, including profiling, which produces legal effects that significantly affects You.
- f) **Rectification:** You may require Your personal data to be rectified or supplemented.
- g) **Restriction:** You may request that We restrict the processing of Your personal data.

3. OUR POLICY REGARDING CHILDREN

- 3.1 We do not and will not knowingly collect personal data from any unsupervised child under the age of 18.

4. WHAT IS PERSONAL DATA?

- 4.1 Personal Data as described in European privacy law is information relating to an identified or identifiable natural individual, which is an individual who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity. This Policy does not cover aggregated data from which the identity of an individual cannot be determined. We retain the right to use aggregated data in any way that We determine appropriate.

5. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

- 5.1 Unless permitted by law, no personal data is collected without first establishing a lawful basis under GDPR Article 6 no. (1) (f) or otherwise assuring that Our Customers have acquired Your consent for our processing under GDPR Article 6 (1) (a).
- 5.2 We only collect, use and disclose personal data for purposes that would be considered reasonable in the circumstances and We only use fair and lawful methods to collect personal data.

6. WHAT KIND OF PERSONAL DATA DO WE PROCESS?

- 6.1 While you place a classified ad on a third-party website, We or Our service providers may collect Your personal data, including, but not limited to,
 - a) Your name
 - b) Username
 - c) Details concerning Your classified ad
 - d) E-mail address
 - e) Phone number
 - f) Address
 - g) VIN number
 - h) Registration number

- 6.2 We will not knowingly collect sensitive personal data about You (e.g. health information). Where We discover that We have tacitly collected such data, it will be immediately deleted.

7. WHY DO WE COLLECT PERSONAL DATA?

- 7.1 We use personal data We obtain from You through Your placement of a classified ad by technical means, such as the automatic recording performed by Our servers, in order to provide, monitor and analyse the use of the Service.

8. FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

- 8.1 We keep Your personal data only as long as it is required for the reasons it was collected from You. The time period in which We store personal data varies, depending on the category of our Customer and the nature of the Personal Data.

- 8.2 When Your personal data is no longer required for Our purposes, We have procedures to destroy, delete, erase or convert it into an anonymous form.

9. DO WE DISCLOSE PERSONAL DATA TO THIRD PARTIES?

- 9.1 We may disclose Your personal data to individuals or organisations who are Our service providers and who are involved in database management, maintaining, reviewing and developing Our business systems, procedures and infrastructure, including testing or upgrading Our computer systems or otherwise facilitates Our Service. These third parties have access to Your personal data only for the purposes of performing these tasks on Our behalf. If We were to disclose personal data to organisations that perform services on Our behalf, We will require those service providers to use such personal data solely for the purposes of providing services to Us and to have appropriate safeguards for the protection of that personal data.
- 9.2 We may also provide Your personal data to Our Customers through their use of the Service. These Customers are separate data controllers who are responsible for having acquired a lawful basis for their processing of Your personal data through Our Service. Such lawful basis may be consent where you have a relationship with said Customer. We take Your personal data and associated rights seriously. As such, only Customers involved in the detection and prevention of fraud, corruption and claims handling may access personal data. Such Customers typically include insurance companies and governmental bodies. Other Customers may only search for data relating to a pending valuation etc., with all personal data removed.
- 9.3 Where We are obliged or permitted to disclose Personal Data without Your consent, We will not disclose more Personal Data than is required. Our use of Personal Data is limited to the purposes described in this Policy and We do not otherwise sell, trade, barter, exchange or disclose for consideration any Personal Data We have obtained.

10. SECURITY

- 10.1 Safeguarding Your personal data is Our highest concern. As such, We endeavour to maintain and employ reasonable measures for the physical, procedural and technical security with respect to the offices and information storage facilities involved with Your personal data, so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of Your personal data. This also applies to Our disposal or destruction of Your personal data.
- 10.2 Our website and Service are scanned, including malware scanning, on a regular basis for security holes and known vulnerabilities in order to make the use of Our Service as safe as possible. Your personal data is contained behind secured networks and We use computer systems with limited access housed in facilities using physical security measures.
- 10.3 If any employee of Us misuses personal data, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organisation misuses personal data - provided for the purpose of providing services to or for Us - this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between Us and that individual or organisation.

11. INTERNATIONAL TRANSFER

- 11.1 Your Personal Data may be transferred to — and maintained on — computers located inside of the European Economic Area and other countries which the European Commission has considered to have an adequacy of protection of personal data on the basis of article 45 of Regulation (EU) 2016/679.

12. ACCESSING, AMENDING OR DELETING YOUR PERSONAL DATA

- 12.1 Where we process Your personal data, We aim to provide You with access to Your personal data. We aim to maintain Our Service in a manner that protects personal data from accidental

or malicious destruction. Because of this, after We delete Your personal data from Our Service, We may not immediately delete residual copies from Our active servers and may not remove personal data from Our backup systems.

12.2 We will provide information from Our records in a form that is easy to understand. Where information will not or cannot be disclosed, You will be provided with the reasons for nondisclosure.

12.3 To guard against fraudulent requests for access, We may require sufficient information to allow Us to confirm that the individual making the request is authorised to do so before granting access or making corrections.

13. CONTACT & COMPLAINT

13.1 If You have any questions or requests regarding this Policy, Our data collection or processing practices, or wish to bring a complaint to Our attention, You may contact Us at gdpr@mohawkanalytics.com

13.2 We will investigate all complaints and if a complaint is found justified, We will take all reasonable steps to resolve the issue.