



Last updated: 26.11.2025

Version: 1.0

Privacy Policy– Processing of Personal Data

1. Who is the Data Controller?

This privacy policy describes how **Vidda Solutions AS** ("Vidda") processes personal data about users of our software/cloud solution(s) ("the Vidda Platform").

| | |
|----------------------------------|-------------------------------------|
| Legal name: | Vidda Solutions AS |
| Organisation number: | 834 081 652 |
| Business address: | Ostadalsveien 3A, 0753 Oslo, Norway |
| E-mail (general contact): | support@vidda.io |

The **data controller** for personal data about users of the Vidda Platform is Vidda Solutions AS, unless otherwise expressly agreed.

2. Data Protection Officer (DPO)

Vidda has appointed the Chief Product Officer as **Data Protection Officer (DPO)**.

- Contact DPO: support@vidda.io

Users may contact the DPO if they have questions about how Vidda processes their personal data or wish to exercise their rights.

3. What Personal Data Vidda Processes

This policy applies to the following user roles in the Vidda Platform:

1. **Compliance Officers**– users at Vidda's customers who administer the solution.
2. **Respondents**– users invited to complete questionnaires/questions via the Vidda Platform.

3.1. Compliance Officers

For users with the role of "Compliance Officer", Vidda typically processes:

- E-mail address
- Role/access level in the solution
- User-related settings
- Technical logs related to use of the service, to the extent necessary for secure operations

3.2. Responder

For respondents invited by a compliance officer, Vidda typically processes:

- E-mail address used to send invitations and grant access
- Access status, such as active/inactive, completed/not completed form
- User-related settings
- Technical logs related to use of the service, to the extent necessary for security and operations

The content of the responses is processed on behalf of our customer, your employer or principal. See section 5.2 regarding when we act as a data processor.

3.3. Technical and Security-Related Data

When using the Vidda Platform, Vidda may also process:

- System and security logs– e.g. timestamps, type of event, which account/role performed what action
- Data related to security mechanisms, e.g. two-factor authentication

This data is not normally intended to directly identify users, but may constitute personal data if it can be linked to the user as an individual.

4. Purpose and Legal Basis

Vidda only processes users' personal data when there is a valid legal basis under GDPR Article 6. The table below summarises purposes, the data used and the legal basis.

Vidda does not rely on consent as the legal basis for ordinary login and use of the Vidda Platform.

| Purpose | Data | Legal basis (GDPR) |
|---|---|---|
| Manage user accounts; compliance officers and respondents | E-mail address, role/access, any account settings | Art. 6(1)(b)– necessary to perform contract with our customer and to provide the service to you via your employer |
| Provide users with secure access to the service (authentication, 2F) | E-mail address, login and security logs, 2FA data | Art. 6(1)(f)– our legitimate interest in a safe and secure service |
| Operations, troubleshooting and improvement of services | Technical logs, aggregated usage information | Art. 6(1)(f)– legitimate interest in operating, developing and improving the solution |
| Customer follow-up and support | Contact information (email), log of relevant events | Art. 6(1)(b) (contract) and (f) (legitimate interest in good customer service) |
| Fulfillment of statutory obligations (e.g. accounting/bookkeeping, security requirements) | Data required under applicable law | Art. 6(1)(c)– necessary to comply with legal obligations |

If Vidda wishes to use personal data for purposes other than those described here, users will be informed and, where required, asked for consent before such processing begins.

5. Where Vidda Collects the Data From

- For **Compliance Officers**, Vidda typically receives the e-mail address directly from the user upon registration or first login.
- For **respondents**, Vidda receives the e-mail address from Vidda's customer– your employer or principal– who registers the user in the Vidda Platform.

When Vidda receives e-mail addresses about respondents from our customers, the information obligation under GDPR Article 14 also applies. Vidda's customers, as data controllers for the relevant compliance activity, are responsible for providing the necessary information about their processing of personal data.

6. Roles in the Processing of Personal Data

6.1. When Vidda is the Data Controller

Vidda is the data controller for:

- Administration of user accounts in the Vidda Platform– Compliance Officers and respondents
- Authentication, access management and security, including two-factor authentication
- Technical operations, troubleshooting and improvement of the platform
- Customer administration and billing

This privacy policy applies to this processing.

6.2. When Vidda is a Data Processor

For the actual content of questionnaires, assessments and responses processed in the Vidda Platform, Vidda normally acts as a data processor on behalf of our customers (e.g. banks or other entities).

- Our customer is then the data controller for this personal data.
- The processing is governed by a separate data processing agreement between Vidda and the customer.
- The customer is responsible for fulfilling the information obligation towards its employees/other data subjects and will normally have its own privacy policy.

7. Sharing of Personal Data and Use of Data Processors

Vidda does not sell personal data and does not share users' data with third parties beyond what is necessary for operating the service.

Vidda may however share personal data with:

1. **Our data processors (sub-contractors)** who assist Vidda in delivering, developing and operating the Vidda Platform, for example IT development and consultancy firms, cloud/hosting providers, security and authentication services.
2. **Data processor in Poland**– Vidda uses Innowise Sp. z o.o., Warsaw, Poland (ISO 27001 certified) as a data processor for development and/or operations. Poland is an EU/EEA country; transfers there are not considered third-country transfers.

3. Cloud/hosting provider– Vidda's hosting provider Innowise uses AWS Bedrock from the Europe London region EU-WEST-2.

Vidda enters into data processing agreements with all data processors, governing how they may process personal data on our behalf in accordance with GDPR requirements. Vidda may also share data where required by law.

8. Transfers to Countries Outside the EU/EEA (Third Countries)

Vidda aims to ensure that all processing of personal data takes place within the EU/EEA. Should it become relevant to use sub-processors that process personal data in countries outside the EU/EEA, Vidda will ensure that transfers comply with GDPR Chapter V, for example through:

- EU Standard Contractual Clauses (SCCs), and
- any necessary supplementary technical and organisational measures.

Information about any specific third-country transfers and applicable safeguards will be made available in an updated version of this policy.

9. Retention Periods and Deletion

Vidda does not retain personal data longer than necessary for the purposes for which it was collected.

User accounts (e-mail, role, settings):

Retained for as long as the user is active through our customer, or for as long as Vidda has a necessary relationship with the user. When the customer relationship ends, or the user is no longer to be a user, the account will as a main rule be deactivated and personal data deleted or anonymised within a reasonable time.

Technical and security-related logs:

Retained for a limited period necessary for purposes such as troubleshooting, security, misuse prevention and audit. After this they are deleted.

Users may also request that Vidda deletes their data– see their rights in section 12.

Vidda currently only uses what is necessary for secure and stable login and use of the service. This may include session mechanisms and technology related to security and two-factor authentication. Vidda does not use cookies for marketing or cross-site tracking without clear information and, where applicable, consent.

9. Automated Decisions and Profiling

Vidda does not use automated individual decisions that have legal effects or similarly significantly affect users, as defined in GDPR Article 22. Any future use of profiling or automated decisions will be described explicitly, including information about the logic, significance and consequences for the user.

10. Users' Rights

When Vidda processes personal data about users, they have a number of rights under the GDPR and the Personal Data Act. Users may contact Vidda or our DPO to exercise the following rights:

1. Right of access

Users may request confirmation of whether Vidda processes personal data about them and receive a copy of such data.

2. Right to rectification

Users may request that Vidda corrects or supplements data that is inaccurate or incomplete.

3. Right to erasure

In certain cases, users may request that Vidda deletes their personal data, e.g. if it is no longer necessary for Vidda to hold it, or if the user objects to the processing and Vidda has no overriding grounds to continue.

4. Right to restriction of processing

Users may request that Vidda restricts processing in certain situations, e.g. while Vidda considers a request for rectification or erasure.

5. Right to data portability

Where Vidda's processing is based on a contract or consent and is carried out by automated means, users may request that data they have provided be delivered in a structured, commonly used and machine-readable format.

6. Right to object

Where Vidda processes personal data based on legitimate interest, users have the right to object. Vidda must then assess whether its reasons outweigh the user's rights and interests.

7. Right to withdraw consent

Where processing is based on consent, users may withdraw it at any time. Withdrawal does not affect the lawfulness of processing before the withdrawal.

Complaint to the Norwegian Data Protection Authority (Datatilsynet)

If users believe that Vidda's processing of personal data is in breach of data protection regulations, they have the right to lodge a complaint with Datatilsynet ([datatilsynet.no](https://www.datatilsynet.no)). Vidda would nonetheless appreciate being contacted first so that any misunderstandings or errors can be corrected.

11. Is the User Required to Provide Personal Data?

To use the Vidda Platform, Vidda requires the user's e-mail address:

- For **Compliance Officers**, it is necessary to create and manage the user's account and provide access to functionality in the solution.
- For **respondents**, it is necessary for Vidda to send invitations and grant access to questionnaires/questions in the platform.

If users do not wish to provide their e-mail address, they will not be able to use the service. There is normally no statutory obligation to provide personal data to Vidda, but participation in a compliance process or completing questionnaires may be part of the user's obligations towards their employer

or principal. This is governed by the relationship between the user and their employer/principal, not by Vidda.

12. How Vidda Protects Personal Data

Vidda uses both technical and organisational security measures to protect users' personal data against unauthorised access, alteration, loss or destruction, including:

- Encrypted communication between client/browser and server
- Encrypted storage of personal data in databases
- Access control based on roles and need-to-know
- Two-factor authentication for users
- Procedures for handling security incidents and deviations
- Data processing agreements and security requirements for suppliers

Vidda regularly assesses and improves its security measures.

15. Changes to This Privacy Policy

Vidda may update this privacy policy when changes occur to:

- Our service
- Applicable regulations
- Our processing activities or sub-processors

For material changes, Vidda will notify users appropriately (e.g. in the solution or by e-mail) and make the updated version available. The date at the top of the policy shows when it was last updated.