**Privacy policy**

This privacy policy (hereinafter ‘the privacy policy’) describes Focus rules for handling personal data, as well as the types of personal data we collect and how we process the collected personal data. This privacy policy may be amended to the extent permitted by applicable legislation.

**1. Purpose of and legal basis for the processing of personal data**

Collected personal data are used by Focus and, on a need-to-know basis, its contractual partners. We only process the personal data of legal persons or their representatives (hereinafter ‘company’ or ‘person’).

We process the personal data of persons: 1) who have submitted a query (potential customer) via Focus website <https://focus-platform.com> (hereinafter ‘the website’); or 2) who browse Focus’s website (potential customer)

Focus uses the collected personal data to contact customers or potential customers and to provide services to them. Focus may also use the personal data to support its economic activities and analyses, carry out business analyses, improve its products and services, and personalise content and advertisements.

The legal basis for the collection and processing of personal data is Focus’s legitimate interest in collecting and processing data to offer, improve, and develop its products and services, as well as to deliver better, targeted advertisements.

Focus will not disclose collected personal data to unauthorised third parties. However, Focus may transfer the personal data to third parties that provide a contractual service to Focus. Such third parties are obliged under the contract to use the personal data disclosed to them only for the provision of the contractual service. Focus may also disclose collected personal data to authorities or other third parties where required by applicable laws.

**2. Processed personal data**

Regular data, for example:

* name
* company name;
* e-mail address;
* country of location.

Personal data collected in connection with the use of our services or website or another similar situation, for example:

* service or website usage data;
* information about the device used;
* IP address;
* browser information

**3. Usual data sources and cookies**

The customer transfers their personal data themselves whenever they purchase a product or service from Focus, as well as when they visit the website and submit a query. Focus collects necessary information about potential customers from public databases. Whenever we transmit information for direct marketing purposes, the customer will see an indication if their personal data have been obtained from public databases.

**4. Data security**

Collected personal data are handled with care and kept confidential. The personal data can only be accessed by persons whose duties include the processing of the personal data.

To access a system containing collected personal data, the users must log in using their personal user ID and password.

All collected personal data are protected against accidental or unlawful access (and alteration, destruction, or other similar processing.

**5. Data retention policy**

Collected personal data shall only be stored for as long as it is necessary and justified or required by applicable legislation.

The personal data of Focus’ customers and potential customers shall be retained throughout the duration of the relevant business relationship. If the business relationship ends and the personal data are no longer actively used, the data shall be made inactive. Inactive personal data shall be deleted in accordance with Focus’s data retention policy.