



Data Protection and Privacy Policy

Version 2.0 — 20 March 2026

Captivate ApS

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Table of Contents

1. Introduction	3
2. Cookies.....	4
3. Types of Personal Data Processed.....	5
4. Purposes of Processing.....	6
5. Legal Basis for Processing.....	7
6. Disclosure and Transfer of Personal Data	8
7. Erasure and Retention of Personal Data	9
8. Data Subject Rights	10
9. Personal Data Breach Notification.....	11
10. Changes to this Policy	12
11. Contact	13
12. Changelog	14

1. Introduction

1.1 This Data Protection and Privacy Policy (the "Policy") describes how Captivate ApS, when acting in the role of a data controller, collects and processes your personal data relating to the purchase of services, membership, products, or your use of our website and the NEXA platform.

1.2 This Policy is prepared and made available to comply with the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 (the "GDPR"), in particular Articles 13 and 14, and the Danish Data Protection Act (Databeskyttelsesloven).

1.3 Where Captivate processes personal data on behalf of its customers (data controllers) in connection with the NEXA platform, Captivate acts as a data processor. The terms governing such processing are set out in the CAPTIVATE Data Processing Agreement (DPA), available at <https://nexahub.io/data-processing-agreement>. This Policy does not cover processing carried out by Captivate as a data processor — for that, please refer to the DPA and to your data controller's own privacy policy.

2. Cookies

2.1 By visiting and using our website(s), cookies may be collected and used based on your consent where required by applicable law. We use the following cookies:

Cookie Name	Purpose	Type	Duration
sessionid	Maintains your login session after sign-in. Allows the website to recognize you across pages without repeated login.	Essential (session)	Expires when browser closes
csrftoken	Protects against Cross-Site Request Forgery (CSRF) attacks by verifying that form submissions come from your browser.	Essential (persistent)	Up to 1 year

2.2 Both cookies listed above are essential for the secure operation of the platform. No marketing, analytics, or third-party tracking cookies are placed.

2.3 Our use of cookies complies with the Danish implementation of the ePrivacy Directive, as amended. If you wish to limit or decline cookies, you can do so by changing your browser settings. However, declining essential cookies may impact the functionality of the platform.

3. Types of Personal Data Processed

3.1 We process personal data about you when this is necessary and in accordance with applicable legislation. Depending on the specific circumstances, the processed personal data may include:

1. Name
2. Email address
3. Telephone number
4. Address
5. Username and password (encrypted)
6. Customer number
7. IP address
8. Account status and purchasing history
9. Invoicing and bookkeeping data

3.2 Captivate does not store payment card details directly. Card payments are processed by our payment gateway, Mollie B.V. (Amsterdam, Netherlands), which handles card data in accordance with PCI DSS standards. Captivate receives only a payment confirmation and reference number from Mollie.

3.3 If we need to collect additional categories of personal data, we will inform you by updating this Policy.

4. Purposes of Processing

4.1 We process your personal data for the following purposes:

1. To deliver products, services, and the NEXA platform.
2. To facilitate sales processes, including registration and account creation.
3. To administer customer accounts and memberships.
4. To provide support and service messages, including responding to questions and complaints.
5. To improve our products, services, and website.
6. To prevent fraudulent behavior or misuse of our products, services and website.
7. To communicate with public authorities when required by law.
8. To store personal data to comply with applicable legislation, such as bookkeeping requirements.
9. To create anonymized and aggregated data for product improvement, as disclosed in our Subscription Terms (Section 5.2).

5. Legal Basis for Processing

5.1 We process your personal data on the following legal bases:

1. **Consent** (GDPR Article 6(1)(a)): Where you have given consent to the processing. You can withdraw your consent at any time by contacting us (see Section 10). Withdrawal does not affect the lawfulness of processing prior to withdrawal.
2. **Performance of a contract** (GDPR Article 6(1)(b)): Where processing is necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering a contract.
3. **Legal obligation** (GDPR Article 6(1)(c)): Where processing is necessary to comply with applicable legislation, such as bookkeeping and tax requirements.
4. **Legitimate interests** (GDPR Article 6(1)(f)): Where processing is necessary for our legitimate interests, provided these are not overridden by your rights. This applies to fraud prevention and platform improvement.

6. Disclosure and Transfer of Personal Data

6.1 We may share your personal data with the following categories of recipients, in each case only to the extent necessary for the purposes described in Section 4:

Sub-processors: Captivate uses sub-processors to deliver parts of the NEXA platform. The current list of authorized sub-processors is maintained in Appendix B of the CAPTIVATE Data Processing Agreement and includes:

Sub-Processor	Location	Purpose
Amazon Web Services (AWS)	Denmark (EU)	Hosting infrastructure for the NEXA platform
Hetzner Online GmbH	Germany (EU)	File sharing and transfer services
Microsoft Danmark ApS	Denmark (EU)	Office 365 online services
MongoDB Limited	Ireland (EU)	Database services
Mollie B.V.	Netherlands (EU)	Payment gateway
ZRM ApS (Zoho)	Netherlands (EU)	Customer lifecycle management and communications
Compaya A/S	Denmark (EU)	SMS gateway for notifications

6.2 **Data location:** All personal data processed by Captivate is stored and processed within the European Economic Area (EEA). We do not transfer personal data to countries outside the EEA.

6.3 We may disclose personal data to public authorities when required by applicable law, for example in connection with tax reporting or law enforcement requests.

6.4 The full terms governing the use of sub-processors, including change notification procedures and Your right to object, are set out in the DPA (Clause 7 and Appendix B).

7. Erasure and Retention of Personal Data

7.1 We retain personal data only for as long as necessary for the purposes described in this Policy, or as required by applicable law. The specific retention periods are:

Data Category	Retention Period
Account and profile data	Retained during the active customer relationship. Automatically deleted upon account closure.
Personal data in backups	Purged in accordance with the standard backup rotation cycle (see SLA §6.1)
Invoicing and bookkeeping data	Retained for 5 years after the end of the financial year in which the transaction occurred, as required by the Danish Bookkeeping Act (Bogføringsloven).
Audit logs	Retained for the duration of the active customer relationship plus 90 calendar days after account closure.
Support correspondence	Retained for the duration of the active customer relationship. Deleted upon account closure, unless a longer period is required for legal or regulatory purposes.
Cookie data (session)	Expires when the browser is closed.
Cookie data (CSRF token)	Up to 1 year.

7.2 The procedures for data return and deletion upon termination of the NEXA service are set out in Clause 11 and Appendix C.4 of the DPA. You may request a return of your personal data in CSV or JSON format by submitting a written request no later than 30 calendar days before account closure.

7.3 If you have questions about our retention of your personal data, please contact us using the details in Section 10.

8. Data Subject Rights

8.1 Under the GDPR, you have the following rights in relation to your personal data:

1. **Right of access** (Article 15): You have the right to request access to the personal data we process about you.
2. **Right to rectification** (Article 16): You have the right to have incorrect personal data corrected.
3. **Right to erasure** (Article 17): You have the right to have your personal data deleted in certain circumstances.
4. **Right to restriction** (Article 18): You may have the right to restrict our processing of your personal data.
5. **Right to data portability** (Article 20): You have the right to receive personal data you have provided to us in a structured, commonly used, and machine-readable format.
6. **Right to object** (Article 21): You may have the right to object to our processing of your personal data based on legitimate interests.
7. **Right regarding automated decisions** (Article 22): You have the right not to be subject to a decision based solely on automated processing, including profiling.
8. **Right to withdraw consent:** If processing is based on your consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

8.2 Your rights may be subject to conditions or restrictions under applicable law. We will respond to requests within one month, as required by GDPR Article 12(3).

8.3 To exercise any of these rights, please contact us using the details in Section 10.

8.4 You always have the right to lodge a complaint with the Danish Data Protection Agency (Datatilsynet) at www.datatilsynet.dk.

9. Personal Data Breach Notification

9.1 In the event of a personal data breach that is likely to result in a high risk to your rights and freedoms, we will communicate the breach to you without undue delay, in accordance with GDPR Article 34.

9.2 The notification will include: the nature of the breach, the likely consequences, the measures taken or proposed to address the breach, and the contact details of our data protection contact.

9.3 We will also notify the Danish Data Protection Agency (Datatilsynet) of any personal data breach as required by GDPR Article 33, without undue delay and where feasible within 72 hours of becoming aware of it.

10. Changes to this Policy

10.1 We reserve the right to update and amend this Policy. If we do, we will update the version number and date at the top of this Policy. If we make significant changes, we will provide notification via a visible notice on our website at <https://nexahub.io> and/or by email to your registered contact address.

11. Contact

11.1 If you have questions about this Policy, wish to exercise your data subject rights, or have concerns about our processing of your personal data, please contact us:

Email: compliance@captivateint.com

Telephone: +45 44 45 46 47

Address: Captivate ApS, Kongstedvej 1, 4200 Slagelse, Denmark

11.2 For service and support enquiries (non-data protection), please contact support@nexahub.io.

12. Changelog

Version	Date	Change
1.0	January 2024	Initial release
2.0	20 March 2026	Wording and references to SLA, DPA and Terms updated. No changes to the intend, content or limitations and rights.