

# Privacy Notice

Last updated: 1 April 2026



## INTRODUCTION

This Privacy Notice explains how Opisense AS ("Opisense", "we", "us") collects, uses, stores and protects personal data in connection with the Opisense AI-powered business platform and our websites. It applies to website visitors, platform users, customers and business contacts.

This notice is prepared in accordance with GDPR Articles 13 and 14, the Norwegian Personal Data Act, and the Norwegian Electronic Communications Act.

## 1. DATA CONTROLLER

Opisense AS is the data controller for the personal data processed in connection with our platform and websites.

For business customers, Opisense may act as a Data Processor, processing personal data on your behalf according to a separate Data Processing Agreement.

## 2. WHAT DATA WE COLLECT AND WHY

### 2.1 WEBSITE VISITORS

We collect analytics data from website visitors using Google Analytics 4 (GA4). This includes IP address, device information, and browsing behaviour. Legal basis: Consent (as per our Cookie Notice).

### 2.2 CONTACT ENQUIRIES

When you contact us with an enquiry, we collect your name, email address, phone number, and message content. Legal basis: Legitimate interest. Retention: 24 months after last contact.

### 2.3 PLATFORM USERS

For platform users, we collect: user account information (name, email, profile data), input data (documents, text, files you upload), output data (results generated by the platform), activity data (actions taken in the platform), technical data (device info, browser, IP address), and integration data (connected services and authentication credentials). Legal basis: Contractual necessity.

## DATA CATEGORIES – DETAILED DEFINITIONS

**Input data** means any text, files, or media submitted by the user to the AI agent. This includes prompts, documents, images, spreadsheets, emails, and other user-provided content used to generate outputs or train models.

**Activity data** means interaction logs, timestamps, feature usage patterns, button clicks, API calls, session duration, login/logout events, and other telemetry collected to understand how users interact with the Opisense platform. Activity data does not include the content of input or output data.

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## **2.4 CUSTOMERS AND BUSINESS CONTACTS**

For customers and business contacts, we collect name, email, phone number, billing address, payment information, and communication records. Legal basis: Contractual necessity and legitimate interest.

## **3. LEGAL BASES FOR PROCESSING**

## **4. RETENTION PERIODS**

## **5. SHARING OF PERSONAL DATA**

We do not sell your personal data. Personal data is shared only with:

- Sub-processors: Third-party service providers who process data on our behalf to deliver the Opisense platform (see Section 6).
- Public authorities: When legally required by court order, law enforcement, or regulatory authorities.
- Acquiring entities: In case of merger, acquisition, or business transfer, personal data may be transferred to the acquiring entity under the same privacy terms.

## **6. SUB-PROCESSORS**

The following sub-processors process personal data on our behalf to deliver the Opisense platform:

An updated list of sub-processors is available at [opisense.com/subprocessors](https://opisense.com/subprocessors). Customers are notified at least 30 days before new sub-processors are engaged.

## **7. INTERNATIONAL DATA TRANSFERS**

Personal data is primarily processed within the EU/EEA. Where data is transferred to countries outside the EU/EEA (such as the USA), we rely on Standard Contractual Clauses (SCCs) approved by the European Commission and the EU-US Data Privacy Framework (DPF) where applicable. You have the right to obtain details of the transfer mechanisms in place by contacting us.

## **8. COOKIES**

Our website uses cookies and similar technologies for functionality and analytics. Please refer to our Cookie Notice at [opisense.com/legal](https://opisense.com/legal) for full details.

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## 9. SECURITY

We implement appropriate technical and organisational measures to protect personal data, including:

- TLS 1.3 encryption for all data in transit
- AES-256 encryption for data at rest
- Role-Based Access Control (RBAC) and least privilege principles
- Multi-Factor Authentication (MFA) for all staff and users where feasible
- Continuous security monitoring and logging
- Regular security assessments and penetration testing where appropriate to risk profile and technical architecture
- Staff data protection and security training

## 10. PERSONAL DATA BREACHES

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of natural persons, we will notify the Norwegian data protection authority (Datatilsynet) within 72 hours of becoming aware of it. Where required by law, we will also notify affected individuals without undue delay.

## 11. AUTOMATED DECISION-MAKING

We do not make fully automated decisions about you that have legal or similarly significant effects. The AI agents feature operates as a support tool to assist users with decision-making, but final decisions remain with the user.

## 12. CHILDREN

Our services are not directed at children under the age of 18. We do not knowingly collect personal data from children. If we become aware that we have collected data from a child, we will delete it promptly.

## 13. YOUR RIGHTS

Under GDPR and Norwegian data protection law, you have the following rights:

### **RIGHT TO OBJECT**

**Right to object to direct marketing:** You have the unconditional right to object to processing of your personal data for direct marketing purposes (including newsletters and promotional communications) at any time.

**Right to object to legitimate interests processing:** You have the right to object to processing based on our legitimate interests (e.g., analytics, fraud prevention, account security) on grounds relating to your particular situation.

To exercise any of these rights, contact us at [contact@opisense.com](mailto:contact@opisense.com). We will respond within 30 days of your request.

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## **14. RIGHT TO COMPLAIN**

You have the right to lodge a complaint with the Norwegian data protection authority:

## **15. REGULATORY REFERENCES**

This Privacy Notice is prepared in accordance with:

- Regulation (EU) 2016/679 (General Data Protection Regulation — GDPR)
- Norwegian Personal Data Act of 15 June 2018
- Norwegian Electronic Communications Act
- Network and Information Security Directive 2 (NIS2) — EU Directive 2022/2555 (where applicable to our security and incident reporting practices)

## **16. CHANGES TO THIS NOTICE**

We may update this Privacy Notice from time to time to reflect changes in our practices or legal requirements. We will notify you by email and update the date at the top of this notice. Your continued use of our services after changes constitute your acceptance of the updated Notice.

## **17. CONTACT**

If you have any questions or concerns about this Privacy Notice or how we process your personal data, please contact us:

### **DATA PROTECTION OFFICER**

**Email:** [dpo@opisense.com](mailto:dpo@opisense.com)

We encourage you to contact us with any questions about how we handle your personal data.