KOMP

Privacy Statement

Last updated: April 11th, 2019

KOMP

The joint controllers are No Isolation AS (Norway), No Isolation BV (the Netherlands), and No Isolation Ltd (Great Britain). No Isolation AS is the main responsible and the point of contact.

In this document, you will find information about the personal data we process and our security measures.

We use the following terms to distinguish between the different types of users:
- KOMP-user: The one that uses the KOMP screen
- App user: The one that communicates with the KOMP through the family app
- KOMP-buyer: The one that buys KOMP

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KOMP

Personal data

Summary:
We process personal data about the KOMP buyer and the app users. We also process metadata about the KOMP for doing customer support.

User accounts
Upon registration, a profile is created by the app user with:
- Name
- Profile picture
- Email
- Phone number

Your name, profile picture and phone number are visible for other app users with access to the KOMP. The name and profile picture is shown on KOMP when you call to give information about who is calling. Your phone number is used to send keywords for user registration and login codes. Your email is used to send information about product updates and news to the users, if you have given consent during the onboarding process. If you contact our customer support outside our opening hours, we can use your email and phone number to contact you to answer the question.

The information is deleted from our systems when you delete your profile. It can be done through the app.

Pictures and messages
You choose the content you want to send to the KOMP. The content can contain information that can be linked to identifiable persons and can, therefore, contain personal data.

The messages and images are visible by the KOMP user and other app users with access to the KOMP.

You can choose the duration when you send the content, and it will be removed from the KOMP after the expiration date/time.

Video stream
The video streams are one-to-one only and end-to-end encrypted. The video stream is not stored and is not possible to access by outsiders.

Support data
The following data are processed in order to provide customer support by No Isolation:
- Metadata:
  - Network information (SSID and internal IP-address)
  - Status of KOMP (online, offline, unavailable)

The information will be deleted when the subscription ends, or before if requested by the customer.

Our administration tool
Customers that buys more than one KOMP can get access to our administration system. Through the system they can assign contact persons to each KOMP. The administrator can also see metadata about the wireless network the KOMP is connected to.

KOMP Pro
KOMP Pro is a platform for the management and use of multiple KOMP's and KOMP apps, made for institutions and municipalities. With KOMP Pro, administrators can manage and check the status of several KOMP's, get an overview of user groups and allocate team members, who in turn can send content in bulk or to a single KOMP in their institution.

This communication channel is separated from the family channel, and the Pro users can not see the content you send or the members of the family group in their system.

Backups
Because of our backup routines, it might take up to 62 days before the data is permanently deleted from all our systems. Only technical personnel, with strict confidentiality clauses in their contracts, have access to the systems.
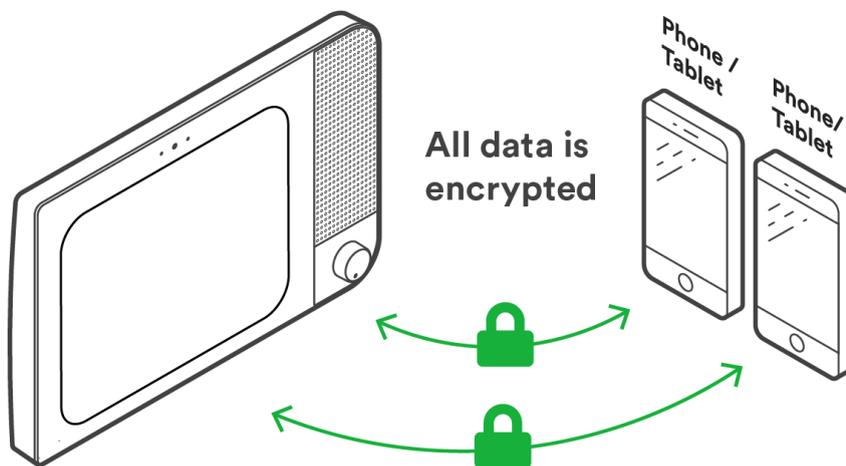
Privacy by design

Summary:
All data is sent encrypted, video calls are end-to-end encrypted. Only invited users can contact the KOMP.

End-to-end encrypted video calls
The video streams are end-to-end encrypted which means that no outsiders, or No Isolation, can access the stream.

You decide the storage time of pictures and messages
When an app user sends a picture or a message to KOMP, the user decides how long the content will be available on the screen. When the picture or message expires, the picture is deleted from the KOMP, the app, and No Isolation's systems (NB! see our backup routines).
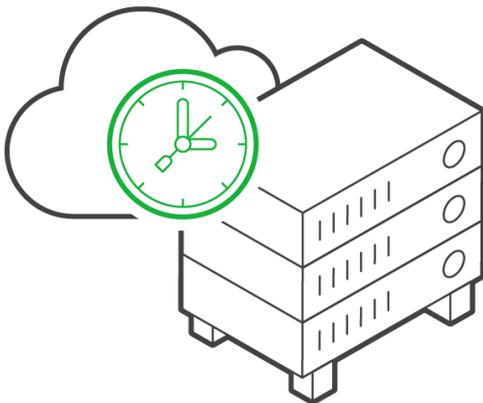
Only invited users can contact KOMP
The first time the KOMP is set up, the first user connects with the one-time keyword provided on the screen. After the initial setup, all users must be invited from an existing user to connect to the KOMP. Every time a new user is added to the KOMP, the KOMP user gets a notification with the name and the profile picture of the user.

KOMP can be turned off
If the KOMP users don't want to be contacted, they can turn off the KOMP by using the button.

Automatic video calls

A frequently asked question is the security and privacy aspect of the automatic video calls (after a 10 seconds countdown, the conversation starts). We highlight the following:
- Only invited users can contact KOMP. To make sure the KOMP user knows who is calling, the name and picture show up on the screen when someone calls.
- During the conversation, the name of the caller is visible on the screen. The caller can therefore not block the camera and mute themselves to make the screen all black to pretend they are not there.
- The KOMP user can end the call before it starts or during the conversation by using the button.
- If the user doesn't want to be contacted, he/she can turn off the KOMP

Your rights

You have the right to request access to the information, and correct or delete your personal data. You can also send a complaint to your local data protection authorities.

Joint controllers

No Isolation AS, No Isolation BV and No Isolation Ltd are joint controllers for the processing of personal data. The relationship and duties are regulated in a joint controller agreement.

Sub processors

No Isolation uses the following sub processors to deliver the service:
- Twilio Inc.
  In cases where the app/KOMP PRO interface and the KOMP are not able to connect directly, we use a TURN-server delivered by Twilio to set up the video stream. The processing takes place in the US.
- Amazon Web Services
  A cloud service provider we use for our servers storing information like metadata, images and messages sent to KOMP, and customer information. The processing takes place in EU/EES.
- MongoDB
  A cloud service provider we use for our servers storing information like metadata and customer information. The processing takes place in EU/EES.
- Functional Software Inc. (Sentry)
  Used to register bugs in our systems and apps. The processing takes place in the US.
- Zendesk
  Our customer chat service provider. The processing takes place in the US.

Transfer of data to third countries

The EU commission has decided that data can be transferred to the US if the processor is certified under the EU-US Privacy shield. All our sub processors located in the US are certified.

Information about the EU-US Privacy shield and a list of all processors certified can be found on www.privacyshield.gov/

Our contact information

No Isolation AS
Norwegian corporate ID number: 815 716 272
Phone number: +47 908 74 495
Address: Trondheimsveien 2, 0560, Oslo, Norway
privacy@noisolation.com