

Privacy Policy from Carbassador AS

Version 1.0, updated November 10, 2025

1. Who is the data controller?

Carbassador AS with org. no. 936537537 and registered business address Slemdalsveien 70B, 0370 OSLO. (hereinafter referred to as "**Carbassador**", "**we**" or "**us**") has developed the Carbassador platform at carbassador.com (hereinafter referred to as the "**Platform**") to make car buying and selling easier, safer and more informed.

The platform connects potential car buyers (hereinafter "**Buyer**") with current owners of similar car models (hereinafter "**Car Owner**") through chat, allowing car buyers to access real user experiences and ask questions directly to people who have practical experience with the car in question.

If you have any questions regarding our processing or wish to exercise other rights as a data subject under the General Data Protection Regulation (hereinafter "**GDPR**"), you can contact us by email at personvern@carbassador.com or by post to Carbassador AS with registered business address Slemdalsveien 70B, 0370 OSLO.

2. Why we process your personal data

Carbassador processes personal data about you as a Buyer or Carbassador in order for you to be able to use our services via the Platform. Your personal data is used to create and manage your user profile (user account as a Buyer or Carbassador) on the Platform. In addition, your personal data is processed so that we can enable contact and dialogue between us and you as a Buyer or Carbassador, and for Buyers and Carbassadors to chat with each other about car purchases.

Personal data is also processed to ensure matching between Buyer and relevant car dealers, so that you can receive offers and follow-up based on your zip code and car interest.

Furthermore, the personal data is used to implement the User Agreement for Carbassadør, Terms of Use for Buyer, reporting, support, as well as to fulfill legal obligations we have as a provider of the Platform with offered services, for example related to accounting regulations.

Our security and reporting functions also require the processing of personal data to prevent misuse and ensure the safe use of the Platform. All of this is done in accordance with the principle of data minimization, and we implement technical and organizational measures to protect your data from unauthorized access and use.

2.2 Basis for processing

Data protection legislation in Norway and the EU requires a "lawful basis" for collecting and processing personal data from residents of EU/EEA countries, cf. GDPR Article 6. Our legal basis for processing your personal data depends on the specific processing purposes and is described below.

2.2.1 Agreement

Processing of personal data is necessary to fulfill the agreement between you and Carbassador, cf. GDPR art. 6 no. 1 letter b. This basis is used where processing is necessary to be able to perform the services that use of the Platform as a Buyer or Carbassador entails. This is the establishment of your profile as a Buyer or Carbassador on the Platform, storage of your contact information and follow-up on your use of the Platform's communication solutions or functionality, including support you request from us.

2.2.2 Legal obligation

Certain processing of personal data is necessary to fulfill statutory obligations incumbent on Carbassador AS under Norwegian law, cf. GDPR art. 6 no. 1 letter c. This includes, for example, the obligation to store and report certain data to public authorities such as the Norwegian Tax Administration or other relevant supervisory and reporting bodies.

2.2.3 Consent

If you have given us your consent, we will share necessary personal information about you with our cooperating insurance companies so that you can receive relevant offers for car insurance, cf. GDPR Art. 6 No. 1 Letter a. We only share information that is necessary for the relevant insurance company to be able to provide you with a customized offer.

Once the information has been transferred to the insurance company, the relevant company will be the controller of the personal data they collect or receive in connection with establishing a possible insurance relationship with you. We therefore recommend that you contact the respective insurance company directly if you have any questions about how they further process your personal data.

Carbassador.com will list current insurance companies. Current offers from these companies are provided to Buyers who have given their consent. You can withdraw your consent at any time by sending us an email stating that you no longer want us to share your personal information with insurance companies.

2.2.4 Legitimate interest

In addition, it is necessary to share certain personal data about a Buyer with relevant car dealers to enable and facilitate the sale of a car to potential buyers, and here we use legitimate interest as the basis for processing, cf. GDPR art. 6. no. 1 letter f. We have conducted a balanced test where we have concluded that our interest in sharing the name, email, mobile number, postal code, car make and car model of a potential buyer with the nearest dealer based on the postal code provided in order to make contact, outweighs the privacy disadvantage for the Buyer. We have limited the processing to apply to lists of potential Buyers belonging to the nearest geographical area for the car dealer.

3. Personal data we process about you

3.1 General information about what personal data we process

Carbassador only collects, stores and shares the personal data that is necessary for you to create a user account and use the services on the Platform. Carbassador collects and processes the following information about you when you create a user on the Platform as a Buyer:

- Name
- Email address
- Mobile number
- Postal code

If you register on the Platform as a Carbassador, we will collect and process the following information about you:

- Name
- Email address
- Mobile number
- Postal code
- Registration number for your car

Processing of this personal data is necessary to administer your user profile on the Platform, enable contact with us or between Buyer and Carbassadør, and facilitate dialogue, advice and relevant offers through the Platform. The information is also used to share contact information with the relevant retailer so that you as the Buyer can receive targeted follow-up and offers.

Processing only takes place for the aforementioned purposes, and Carbassador does not use the information for other purposes without specific consent or where there is another statutory obligation.

Carbassador will not process content from chats between Buyer and Carbassador since chat content between Buyer and Carbassador is considered confidential. We only log who has been in contact with whom (for points to Carbassador and for technical purposes). We have access to chats between us and you as Buyer or Carbassador, among other things, to handle the support requested by you.

3.2 Storage and deletion of personal data

Personal data is stored securely on servers in Finland, within the EU/EEA, with necessary technical and organizational measures to protect data against unauthorized access, modification or deletion. We enter into data processing agreements with all external providers to ensure that the level of security and processing is in accordance with the GDPR.

Your information will only be stored for as long as is necessary to fulfill the purpose or as otherwise required by law. When the purpose no longer requires storage, or if you request deletion or exercise your right to object under GDPR Art. 21, the information will be deleted as soon as possible, unless it must be stored longer by law. We aim to keep deletion procedures as short as possible.

3.3 Sharing of personal data and third parties

Carbassador does not share your information with unauthorized parties. Personal information may be shared with relevant car dealers (only in the relevant geographical area) in line with the purpose of facilitating contact and offers if you have been in contact with a Carbassador about a possible purchase. Dealers only receive information about relevant buyers.

Subcontractors who handle IT operations, storage and security for the Carbassador platform may also have access to certain personal data when providing their services. For example, personal data will be shared with our IT provider who has developed the Platform for us, the IT provider Rinf Tech in Romania with whom we have a data processing agreement. Your personal data on the Platform is stored securely on a dedicated server in Finland provided by Hetzner as a data processor.

Separate data processing agreements have been entered into with Rinf Tech and Hetzner, so that they do not have access to or can use personal data for their own purposes and which ensure that security requirements are met. If the suppliers are changed, or if it becomes necessary to transfer data to countries outside the EU/EEA, this privacy statement will be updated.

4. Your rights

You have rights as a data subject under the GDPR to your own personal data that we process via the Platform. An overview of these is provided below. Please contact us if you wish to exercise your rights. We will respond to your inquiry as soon as possible and within one month.

Information and access : You have the right to request information about how we process your personal data and to receive a copy of this personal data.

Rectification : You have the right to request the correction of inaccurate personal data about you, and for any incomplete personal data about you to be completed.

Objection : You have the right to object to the processing of your personal data under specific conditions. You can also object to being subject to any individual decisions of a legal nature that are solely automated.

Deletion : You have the right to request deletion of your personal data under specific conditions.

Restriction : You have the right to ask us to restrict our processing of your personal data so that we no longer process this information until the restriction is lifted.



Portability : You have the right to receive your personal data in a structured, commonly used and machine-readable format, and to have this information transmitted to another company under certain circumstances.

Complaint : You have the right to complain about our processing of your personal data to the Norwegian Data Protection Authority. We encourage you to raise any objections to our processing of personal data with us first, so that we can clarify any misunderstandings.

Please note that these privacy rights are subject to limitations as provided by law. You can also read more about your rights in the Norwegian Data Protection Authority's guidance on the rights of data subjects, which can be found at www.datatilsynet.no.

If you have any questions about this privacy policy, your personal data or believe that we are processing your personal data in an unlawful manner, you can contact us by sending an email to personvern@carbassador.com. If you believe that the information and assistance you receive from us is not sufficient, you have the right to complain to the Norwegian Data Protection Authority. You can find the Norwegian Data Protection Authority's contact information at www.datatilsynet.no.

We update the privacy policy as needed. Major changes will be notified directly, otherwise the updated statement is always available on the Platform website carbassador.com.