

Data protection and privacy policy

Data controller

FDE A/S

Lyren 1, Bovmark

6330 Padborg

Denmark

Company registration number: 15452986

1. Introduction

- 1.1 This data protection and privacy policy (the "**Policy**") describes how FDE A/S ("**us**", "**we**" or "**our**") as a data controller collects and processes personal data relating to the purchase of services, membership, products or general use of our website.
- 1.2 The Policy is prepared and made available to comply with the general data protection regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included herein on information to be provided to you.

2. Types of personal data processed

- 2.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data: name, address, telephone number, email, username, purchasing history, invoicing and bookkeeping data and documentation, payment card details. In addition, we also process the following types of personal data when relevant: IP address and information from publicly available and relevant social media platforms.
- 2.2 We do not collect or process sensitive personal data (so-called "special categories of personal data").
- 2.3 When it is relevant, personal data is collected directly from the data subject or from external sources. Personal data may be collected from the organization that you work for or from publicly available sources.
- 2.4 If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by our updating of this Policy.

3. Purposes for processing the personal data

- 3.1 We only process personal data for legitimate purposes in accordance with the GDPR. Depending on the circumstances, the personal data is processed for the following purposes:
 - a) To deliver products or services to a user, customer or member.
 - b) To provide service messages and information to users, customers or members.
 - c) To store personal data to comply with applicable legislation requirements such as bookkeeping acts.
 - d) To send direct marketing to users, customers or members.
 - e) To prevent fraudulent behavior or misuse of the IT System.
 - f) To send newsletters on e-mail.
 - g) To communicate and exchange data with public authorities when required by law.
 - h) To give support and service messages, including answering questions and complaints and send updates about our products and services.
 - i) To prevent fraudulent behavior or misuse of our products, services and website, including the processing of personal data for the purpose of legal actions.
 - j) To improve our products, services or website.

4. Legal basis for processing personal data

4.1 We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a) If we have asked for a consent for the processing of specific personal data, the legal basis for such personal data is a consent, cf. article 6(1)(a) of the GDPR, as the consent can always be withdrawn by contacting us via the contact details provided at the end of this Policy, and, if the consent is withdrawn, the personal data processed on the basis of consent is deleted, unless it can or must be processed, for example, in order to comply with legal obligations.
- b) The processing is necessary for the performance of a contract to which the data subject is party, cf. the GDPR, article 6(1)(b), the first indent.
- c) The processing is necessary in order to take steps at the request of the data subject prior to entering into a contract, cf. the GDPR, article 6(1)(b), last indent.
- d) The processing is necessary for compliance with applicable legislation, cf. the GDPR, article 6(1)(c).
- e) The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, cf. the GDPR, article 6(1)(f).

4.2 In addition to the above, in some instances we process social security number or other identification number (CPR in Denmark). Before we perform such processing, we will collect a consent hereto. We perform this processing activity for the following purposes: only when strictly necessary and relevant to deliver our services.

4.3 In addition to the above, in some instances we disclose personal data to third-parties in order for the third-parties to use the personal data to marketing activities on their own behalf. Before we perform such processing, we will collect a consent hereto. We perform this processing activity for the following purposes: We use Google Analytics to improve the user experience on our website(s).

5. Disclosure and transfer of personal data

5.1 We only pass on personal data to others when the law allows it or requires it. Our company is part of a concern/company group where personal data is shared between the group companies depending on the circumstances.

5.2 We transfer personal data to the following recipients from the EU/EEA:

- a) Tax authorities (for example in connection with accounting etc.).
- b) Banks (for example in connection with payments etc.).
- c) Data processors.
- d) Suppliers.
- e) Collaborators.

5.3 From time to time we use external companies as suppliers to deliver assist us in delivering our services. The external suppliers will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed on the basis of a data processor agreement in accordance with the requirements hereto under GDPR. Where

the external parties are data controllers, the processing of personal data will be performed based on said external parties' own data privacy policy and legal basis which the external parties are obligated to inform about unless the applicable legislation allows otherwise.

- 5.4 We transfer personal data to countries or international organisations outside the EU/ EEA. We transfer personal data to USA. Such transfers are based on the recipients self certifications under "EU-U.S. Privacy Shield". Read more about Privacy Shield on the websites of the national authorities or at www.privacyshield.gov. Personal data is transferred to the following countries: The applicable Google Analytics data centers as stated via <https://www.google.com/about/datacenters/inside/locations/index.html>.. Such transfers are based on the standard contractual clauses about data protection made or approved by the EU Commission and possibly approved by a national supervisory authority, ensuring a sufficient level of protection.
- 5.5 If you have any questions about our use of data processors, cooperation with other data controllers, including subsidiary companies, or transferring of data to third countries, please contact us for more information or documentation of our legal basis for said transfers.

6. **Erasure and retention of personal data**

- 6.1 We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We also retain personal data to the extent that it is an obligations from applicable law, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of personal data, please contact the email mentioned at the bottom of this Policy.

7. **Data subject rights**

- 7.1 Data subjects have a number of rights that we can assist with. If a data subject wants to make use of his or her rights, he or she can contact us. The rights include the following:
 - 7.1.1 The right of access: Data subjects have a right to ask for copies of the information that we process about them, including relevant additional information.
 - 7.1.2 The right to rectification: Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.
 - 7.1.3 The right to erasure: In certain circumstances data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.
 - 7.1.4 The right to restrict processing: Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject has the right to have the processing of his or her personal data restricted, such personal data shall, with the exception of storage, only be processed with the

data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.

7.1.5 The right to object: Data subjects have, in certain situations, a right to object to the legal processing of his or her personal data. Objection can also be to the processing of personal data for the purpose of direct marketing.

7.1.6 The right to data portability: Data subjects have, in certain situations, a right to receive his or her personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data has been provided.

7.2 More information about data subject rights can be found in the guidelines of the national data protection authorities.

If a data subject wishes to make use of his or her rights as described above, the data subject is asked to use the contact details provided at the end of this Policy.

We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.

8. **Changes to this Policy**

8.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

9. **Contact**

9.1 If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at Pia S. Jørgensen at psj@fde.dk or our DPO at pah@itd.dk.

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Yours sincerely,

FDE A/S