

Guidelines for the processing of personal information at Freund Elektronik A/S

Freund Elektronik A/S

Fuglebakken 119

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CVR: 11790984

(Hereafter referred to as Freund)

1) General

1.1 This Personal Data Policy (Policy) applies to all information that you provide to us, and/or we collect about you. Either through customer or employee-relation or through use of our services, including our website. In this Policy you can read more about which information we collect, how we handle your information and how long we keep said information as it pertains to you etc. You are encouraged to read this Policy and contact us, if the Policy contains terms you cannot accept. You can always find the current version of this Policy on www.freund.dk

2) Data Controller

2.1 The Data Controller for handling and processing your personal information is the CEO of Freund.

2.2 The guidelines of this Policy are authored by Freund based on the EU General Data Protection Regulation (GDPR), which has been in effect in Denmark since 25 May 2018, as well as newer Danish data protection laws, which supplement the rules of the GDPR.

2.3 All questions regarding the aforementioned Policy, the processing of your information as well as suspicion of failure to comply, should be directed to the HR department at hr@freund.dk

3) Definitions

3.1 Listed below are definitions of the terms most applicable to personal information.

Personal information: Any type of information pertaining to an identified or identifiable physical person. This includes all information which, directly or indirectly, alone or in combination, can identify a physical person.

Data Controller: The physical or legal person, government authority, institution, or other entity, which alone or with others determines the allowance of the processing of personal information, and for which purposes.

Data Processor: The physical or legal person, government authority, institution, or other entity, which processes personal information on behalf of the Data Controller.

Processing: Any activity or series of activities which involve the use of personal information, such as collection, registration, systemization, altering, searching, collating, transferring to persons or official entities etc. outside of Freund.

Special Categories of Personal Information: Information regarding race or ethnic origin, political, religious or philosophical convictions or worker's union status, genetic information, health-related information or information pertaining to a person's sexual relations or sexual

orientation as well as information in the form of biometric data, insofar as biometric data is processed for the sole purpose of identifying a physical person (sensitive information).

The Data Protection Act

The law regarding supplemental ordinance for the protection of physical persons as pertaining to processing of personal information and concerning the free exchange of said information (the Data Protection Act), passed into law 17 May 2018.

4) The Purpose of Processing your Personal Information

4.1 Depending on you being a customer, partner or employee of Freund, or simply a user of our website, we are obligated to process your personal information to the extent that we can provide the service you request, and that we can fulfill our obligations as Freund Elektronik A/S. This applies to your purchase of goods, technical services or technical support with us and/or when we have to administrate your information as an employee. It could also be your use of our customer service and/or in connection with marketing.

5) The information we process about you

5.1 The information we gather directly from you:

5.1.1 As a customer or supplier of Freund, the following personal information pertaining to you is collected:

- Business name
- Street name
- Delivery address
- Postal code
- City name
- Telephone/mobile
- E-mail address (contact e-mail)
- E-mail for invoice – e-invoice/EAN

5.1.2 As an employee of Freund, the following personal information pertaining to you is collected:

- Name
- Street name
- City name
- Social Security Number (CPR nr)
- Mobile phone number
- E-mail address
- Account information for the purposes of salary
- CV information
- Criminal record
- Driver's license number
- Information regarding next of kin

5.1.3 When visiting our website and navigating our universe, we collect your IP address

5.1.4 As a rule no Special Category of Personal Information (sensitive information) is collected about you, however in such cases where it is necessary for the processing of your relations, we collect health information.

5.1.5 With regards to a request for security clearance with FE (Danish Defense Intelligence) for an employee, we collect information about civil status (married, divorced etc.) as well as the applicant's possible partner name and social security number on the application, which is scanned and kept as documentation for the application.

5.2 These personal information are collected from other parties as pertain to you as an employee:

5.2.1 In some cases it may be necessary to collect personal information about you from other parties: SKAT, other government entities or retirement investment companies. We collect this information with the aim of complying with current legislation and honoring an agreement made with you.

6) Cookies

6.1 Our website uses "cookies" to manage logins and collect web statistics. A cookie is a small text file, sent from our server to your browser and stored on your computer's hard drive or your mobile device. Cookies mean you can use our website more effectively and easily. We do not process information about user habits, which are collected via cookies in such a way, as to tie user habits to specific individuals. You can set your browser to notify you when you receive a cookie, so you can always determine whether you wish to accept it. You can also choose to completely disable this functionality. If you choose to do so, the website will not function optimally. Cookies do not contain personal information, such as your e-mail address, user ID or other personal information besides from what is covered in this Policy.

7) How we process your personal information

7.1 Specifically, we process your personal information for several purposes, depending on whether you are a customer or employee, or simply a visitor on our website.

7.1.1 If you are a customer, we use your personal information for

- making the functionality of our website available to you
- sending offers, order confirmations and invoices
- providing technical support
- managing your order
- managing our customer relations with you
- sending you marketing materials, provided this follows applicable marketing legislation

7.1.2 If you are an employee, we use your personal information for

- managing our hiring agreement
- sending you necessary information about the terms of your employment
- sending you marketing materials, provided this follows applicable marketing legislation
- verifying your previous experience as per CV and educational certificates

7.1.3 If you are a working partner, we use your personal information for

- honoring any agreements made

7.1.4 If you are a user of our website, we use your personal information for

- making the functionality of our website available to you

- generating statistics about your use of our website
- optimizing our website

8) Why are we allowed to process your information?

8.1 When you become a customer or employee of Freund, or enter into another form of agreement with us, we process your regular personal information for that specific purpose. We may also process your regular personal information, if you make enquiries or the like, prior to your decision to enter into an agreement with us. The legal grounds for the processing of your personal information are Article 6, Section 1 (b) of the Danish Data Protection Act, in that the processing of your personal information is needed for us to fulfil our agreement with you, or in order to manage any enquiries you make prior to entering into an agreement with us.

8.2 We may also process your regular personal information if we have a legitimate interest in processing information regarding you, as per Article 6, Section 1(f) of the Danish Data Protection Act, unless your right to the protection of your personal information supersedes our legitimate interest in processing said information.

8.3 We have a legitimate interest in processing your personal information (your name and email address) for marketing purposes. Our legitimate interests thus include knowing your preferences, so we may better tailor our offers to you and ultimately offer goods and services that better meet your requirements and wishes. We naturally abide by current marketing legislation. It is concerning this, that we generate various statistics about the number of customers, purchases, use of our website etc.

8.4 In certain cases we may have a legal obligation to process your personal information

8.4.1 It may be for documentation of transactions or similar as pertains to accounting legislation. We are required to keep fiscal information for five (5) years from the end of the fiscal year the material pertains to. It may also be for the purposes of reporting to SKAT, so that you may receive your deductible for your contributions to us. Reports to SKAT must be made with a Social Security Number (CPR-nr) as to taxation oversight legislation, thus forming the basis for our processing of your CPR-nr.

8.4.2 It may be for the purposes of fulfilling our obligations under the law pertaining to information about the employer/employee relationship for a minimum of five (5) years.

8.4.3 It may be for documenting cases related to personnel or workplace injuries, where we are required to be able to document our relationship with you at a given time.

8.4.4 It may be for transferal to a retirement investment company, to honor agreements made with you.

8.5 We are also able to process your regular personal information as we have a legitimate interest in processing information regarding you, as per Section 6 of the Data Protection Act.

8.5.1 It may be to document your skills and experience related to tenders and other customer-facing tasks, that we are undertaking or have undertaken.

8.5.2 It may be for the use of employee development planning.

8.5.3 It may be to obtain security clearances or other permits.

8.6 If you provide or have provided Special Categories of Personal Information (sensitive information) to us, such as health information, the basis of our processing these are Article 9m section b and h of the Danish Data Protection Act, wherein we use the information in for dealing with health-related absence from the workplace or work-related injuries.

8.7 If you are not a customer or employee, but simply use our website, we do – in a limited capacity – need to administer the information you provide us, like through cooking management. Read more in our cookie policy at www.freund.dk. In some cases, we might register which IP addresses

have visited our website. An IP address may constitute a personal information, and insofar as we process your IP address, it will happen in the same manner as described above in section 8.3.

9) Sharing your Personal Information

9.1 We may share your personal information with our suppliers and partners who assist us in carrying out your order, assist us with IT management, hosting etc. This means that we may share your information with our service contractors, our technical support, and our bank.

9.2 We may also share your information with our holding corporation in the extent this is legal. You can see our organizational chart on www.freund.dk

9.3 In addition to the above, we will share your information to the extent we are required to, as when requested by authorities, such as SKAT.

10) Sharing your information with recipients outside of the EU/EEA

We do not transfer any information to recipients in nations that form a third party.

11) Storing and deleting your Personal Information

11.1 We store your personal information according to the following ruleset:

11.2 If you are a customer of Freund Elektronik A/S you only provide non-sensitive personal information. On this basis, it has been decided, that as a rule, information will not be deleted unless a registered person invokes their Right to be Forgotten.

A specific assessment has been made regarding the products and services Freund Elektronik A/S provides and the need for data history our customers might have. It is deemed that the regard for the ability of a Customer to receive copies of their data history outweighs the need for deletion of data.

In instances where one receives access codes to solve a single task, the code in question is kept for as long as the work is ongoing, after which it is deleted.

11.3 If you are an employee, your personal information will be kept for a minimum of five years after the end of employment, in accordance with applicable legislation. If there are ongoing personnel or work-related injury cases, the information is kept longer and until such a time as said cases can be considered closed.

12) Your Rights

12.1 Insight

12.1.1 You are entitled to insight into any personal information that we process about you. By writing to us (on the below-mentioned email address – see item 12.7) you may request an insight into any personal information we have registered about you, including the purposes of gathering the information. We will accommodate your request as quickly as possible.

12.2 Correction and deletion

12.2.1 You are entitled to request correction, supplemental processing, deletion or blocking of the personal information we process about you. We will accommodate your request as quickly as possible, to the extent it is necessary. If we, for any reason, cannot accommodate your request, we will contact you.

12.3 Limiting the Processing of Personal Information

12.3.1 You are – in special circumstances – entitled to limit the processing of your personal information. Please contact us if you wish to limit the processing of your personal information.

12.4 Data portability

12.4.1 You are entitled to receive your personal information (only information pertaining to yourself that you have provided us with) in a structured, commonly used, and machine-readable format (data portability). Please contact us if you wish to invoke your right to data portability.

12.5 Your Right to Object

You are entitled to request that we not process your personal information in such cases where processing is based on article 6, section 1(e) (task in the best interest of society or exertion of official authority) or article 6, section 1(f) (legitimate interest). It is stated in this policy to which extent we process your information for such purposes. You may object at any time by contacting us.

12.6 Rescinding Consent

12.6.1 If the processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal of consent does not affect the legality of the processing, which occurred before you withdrew consent. Please contact us if you wish to withdraw your consent.

12.6.2 If you wish to withdraw your consent to receiving sales related information or offers in general, including by regular post, email, text message, via telephone or other electronic means, you may do so at any time by writing hr@freund.dk. If we have doubts about your identity, we may ask you to provide identity verification. Asides from general communications costs, this is free of charge.

12.7 You may write to hr@freund.dk to make use of one or more of the aforementioned rights. There may be conditions or limitations tied to the exercising of said rights. It is therefore not guaranteed, that you may have the right to data portability in the specific case – this depends upon the special circumstances surrounding the processing activity in question.

13) Possible consequences of not providing personal information

13.1 Insofar you are obligated to provide information about yourself to us, it will be stated at the point of collection. If you do not wish to provide the personal information we request, it may be that we cannot provide you with the services you are requesting, cannot process your orders, establish you as a contributor, honor our agreement with you in terms of employment etc.

14) Security

14.1 At Freund, our processing of personal information is subject to our IT and Security Policy. Our IT and Security Policy includes rules for the completion of risk-assessments and consequential analysis of existing, as well as new or changed processing activities. We have implemented internal rules and procedures for maintaining an appropriate level of security from the time we collect your personal information, to the point of deletion, as we solely leave the processing of personal information to Data Processors, who maintain the appropriate security level.

15) Complaining to the appropriate supervisory authorities

15.1 If you are not satisfied with our processing of your personal information you may file a complaint with the Danish Data Protection Agency (Datatilsynet): **Datatilsynet, Borgergade 28, 5th floor, 1300 Copenhagen K, telephone 3319 3200, email: dt@datatilsynet.dk**

16) Updating this Policy

16.1 Freund is obligated to comply with the basic principles of the protection of personal information and data protection. We therefore review this policy on a regular basis, to ensure it is up to date and in compliance with existing principles and legislation. This policy is subject to change without prior notice. Substantial changes to this policy will be announced on our website, along with an updated version of this policy. We also refer to the website of Freund Elektronik A/S www.freund.dk where our policy on integrity can be found.

16.2 Any changes we might make to this policy in future, will be published on this website and may be sent to you via email.

This policy was last updated 30.03.2020