# DanofficeIT Policy for Personal Data

**Danoffice IT Green** 

# **DanofficeIT**

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## 1 Introduction & Purpose

- 1.1 Danoffice IT Green is obliged to under the General Data Protection Regulation (EU Regulation 2016/679) and the Danish Data Protection Act to protect personal data processed about customers, suppliers, business partners, employees, and other natural persons.
- 1.2 In this personal data policy, you can read more about how we generally process personal data and the principles on which the processing is based in cases where we are entrusted with the processing of personal data.
- 1.3 We also explain what types of data we collect and what we process it for, and what rights you have if or when we process data about you.
- 1.4 We prioritize the correct and lawful processing of personal data. It is crucial to us that you can trust that your data is processed securely and lawfully.

# 2 Who is the Personal Data Policy for?

- 2.1 Our personal data policy is an information for everyone we process personal data about.
- 2.2 Our personal data policy is also a supplement to our internal guidelines, which apply to all our employees.

# 3 Our Principles for Processing of Personal Data

- 3.1 Danoffice IT Green processes personal data to the extent that this is necessary to fulfil its function as a supplier and processor of new and used IT infrastructure.
- 3.2 Our processing of personal data is carried out in a lawful and fair manner and in full compliance with the rights of the data subjects.
- 3.3 The personal data we process must be accurate and must be updated and rectified in case of changes and incorrect personal data.
- 3.4 Our processing of personal data is limited in time (see section on erasure).
- 3.5 All processing of personal data is considered confidential. Danoffice IT Green guarantees that our employees are aware that the processing of personal data must be carried out confidentially and in accordance with personal data legislation.

- 3.6 Our principles for processing of personal data are:
  - Everyone we process personal data about must feel comfortable with our processing.
  - We have defined a legitimate purpose before we start processing personal data.
  - We have organized ourselves in a manner to ensure processing is in accordance with the General Data Protection Regulation and the Danish Data Protection Act.

# 4 Processing Activities and Employee Administration

- 4.1 As a data controller, we carry out a number of processing activities, which include, in particular, personnel administration, the realization of customer and supplier collaborations and marketing activities.
- 4.2 We keep internal records of our processing activities.
- 4.3 We inform our employees internally about our processing of their personal data.

## 5 Customer Collaborations

- 5.1 We collect and process necessary personal data to be able to co-operate with our customers. We endeavor to collect only the information that is necessary for the performance of the cooperations, including the fulfilment of our obligations.
- 5.2 In connection with customer collaborations, we typically only collect and process general personal data, such as name, address, telephone number, email address and similar contact information for the customer's owners and contact persons. The personal data is collected using our internal IT system and stored in our customer database.
- 5.3 In addition, this will include information exchanged with us, such as e-mail correspondence, telephone notes, other mail, etc.
- 5.4 Processing of such personal data is necessary to pursue our legitimate interests in relation to the administration of our business and the fulfilment of obligations to customers.

## **6** Suppliers and Other Business Partners

- 6.1 We collect and process necessary personal data in order to be able to co-operate with our suppliers and other business partners. We endeavor to collect only the information that is necessary for the implementation of the cooperation, including primarily the fulfilment of our obligations and safeguarding our interests in relation to the processing and sale of IT equipment and services.
- 6.2 In relation to suppliers and other business partners, we typically only collect and process general personal data such as name, address, telephone number, e-mail address and similar contact information for relevant contact persons.
- 6.3 In addition, this will include information exchanges with us, such as email correspondence, telephone notes, other mail, etc.
- 6.4 Processing of such personal data is necessary to pursue out legitimate interests in relation to the administration of our business and the general operation of our business.

## 7 Marketing Activities

- 7.1 We collect and process personal data in connection with our marketing activities. We endeavor to ensure that we only collect the personal data necessary to achieve the marketing purpose we have defined.
- 7.2 Our overall marketing activities include, among other things, the delivery of news briefings and the use of cookies on our website.
- 7.3 We have established separate terms and conditions for our news briefings, and we have a cookie policy on our website.

## 8 Where do we Collect Information?

8.1 The personal data we collect, and process is collected from the data subjects themselves or their employer in the case of a supply agreement with companies.

## 9 Disclosure of Personal Data

- 9.1 Depending on the personal data in question, the purpose of the processing and the context in which the personal data is processed, we may disclose personal data to third parties, including a public authority such as a municipality or the Danish Tax Agency, etc.
- 9.2 If personal data is processed as part of a supply or co-operation agreement with a company, information about the company's employees is disclosed to the company.
- 9.3 To a certain extent, we also share personal data with suppliers when it is necessary for the fulfilment of the purpose of the collaboration.
- 9.4 We ensure that when disclosing personal data, we have the necessary basis for processing for a dis-closure of personal data.

## 10 Security of Processing of Personal Data

- 10.1 We ensure the confidentiality, integrity, and availability of the personal data we process through technical and organizational security measures.
- 10.2 Our technical security measures include the security of the IT systems we use in our business. Our organizational security measures include that we have established guidelines and policies that our employees must comply with. We follow up on these and train our employees as appropriate.
- 10.3 Our security for processing of personal data also includes ensuring lawful processing, including compliance with the processing principles required by data protection legislation, and ensuring that we have a legal basis for our processing of personal data.

## 11 Erasure

- 11.1 We delete the personal data we collect and process when our processing purposes are fulfilled, and we no longer need the data.
- 11.2 Please contact us if you want your personal data to be deleted immediately.

## 12 Rights of the Data Subject

12.1 The persons we process personal data about have a number of rights under the data protection legislation, which we respect. These rights include:

### • The right to receive information about the processing of personal data

You have the right to receive information about what data we process about you and for what purposes, who we share the data with, etc. You will generally receive this information when we collect the data specifically or the first time, we contact you.

#### • The right to access

You have the right to ask to access information about whether we process personal data about you and, if so, which data.

### • The right to rectification or erasure

You have the right to have inaccurate information about yourself rectified (corrected). This also includes supplementing the information, we have registered about you. In some situations, you also have the right to have the data we process about you deleted before the time when we would delete the data according to our regular deletion procedures.

#### The rights to have data processing restricted

In some situations, you have the right to restrict the processing we carry out on your personal data. This is especially if you believe the processing is unlawful or if you contest the accuracy of the data.

### • The right to receive information about yourself (data portability)

In some situations, you have the right to receive information about yourself in a structured form and in a commonly readable format. This is called the right to data portability.

#### The right to object to processing

You have the right to object to our processing. We may then only process the data if we can demonstrate compelling legitimate grounds for the processing that override your interests.

## • The right to withdraw consent

If we process data about you on the basis of your consent, you can always withdraw such consent. If you withdraw your consent, we may not process your data in the future, unless we are authorized to continue processing on the basis of another legal basis. This may be, for example, because we are obliged to do so, or we have an agreement with you that we must fulfil.

12.2 If you as a data subject want to exercise your rights, you can contact us. You can find our contact information below.

## 13 Complain

13.1 If you disagree or are dissatisfied with the way we process your personal data, you can complain about the processing. We hope that you will initially complain directly to us. Please send your complaint to Danoffice IT Green to:

Morten G. Arknæs, Vice President, Danoffice IT Green A/S – mga@danofficeit.com.

Our other contact information can be found below.

13.2 Your also have the right to lodge a complaint with the Danish Data Protection Agency if you are dissatisfied with the way we process your personal data. You can find the Danish Data Protection Agency's contact information at datatilsynet.dk.

## 14 Our Contact Information

14.1 Our full contact information is:

Danoffice IT Green A/S Delta 8, DK-8382 Hinnerup CVR nr. 32840647

Tel. +45 6221 1766

- 14.2 Our data protection officer is:

  Ole Hansen (Contract and Compliance Manager), Danoffice IT A/S oh@danofficeit.com.
- 14.3 Please feel free to contact us if you have any questions of if you wish to exercise your rights.

# 15 Update of our Personal Data Policy

15.1 From time to time, it will be necessary for us to update this personal data policy. We regularly review our personal data policy to ensure that it is up to date, accurate and in accordance with applicable legislation and principles for the processing of personal data. We publish new versions on our website danofficeit.com.