

Data protection and privacy policy - Sales

EGN Group

Incl. Denmark, Sweden, Norway,
Finland, Germany, the Netherlands
and Singapore

Company registration number: - - -

1. **Introduction**

- 1.1 This data protection and privacy policy (the "**Policy**") describes how EGN Group ("**us**", "**we**" or "**our**") processes your personal data in connection with sales and marketing.
- 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. In addition, we may also process other types of personal data about you as relevant in under the specific circumstances, such as other contact information, your job title, information about your workplace such as the name of the organisation and similar information in addition to notes that we may have taken in connection with dialogs held.
- 2.2 We do not collect sensitive personal data (so-called "special categories of personal data"), and we therefore only process such data if you send them to us on your own initiative.
- 2.3 When it is relevant, personal data is collected directly from the data subject or from external sources. In addition, personal data may also be collected from LinkedIn, from company websites and similar. We may also have received your contact information from network members.
- 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 facilitate a sales process.
 - b) To send direct marketing to users, customers or members.

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
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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 compliance with applicable legislation, cf. the GDPR, article 6(1)(c).
- c) 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 If we send you direct marketing, including by email, we will ask for your prior consent in accordance with the applicable rules such as marketing acts.

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, including when relevant and asked to do so by you or a data controller.

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

- a) Data processors.

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.

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 obligation 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 gdpr@egn.com.

This is version 4, last updated 08.02.2020 13:42.

Yours sincerely,

EGN Group
