

Privacy Policy

Customers and potential customers of Flügger A/S

As controller, data protection is highly important to us. We protect the personal data we handle and we make sure that we comply with the Danish data protection legislation.

We provide the persons about whom we process data (the 'data subjects') with information about our data processing and about the rights of data subjects.

This privacy policy describes our processing of data about our current, former and potential customers.

Who are we – and how to contact us

Identity and contact details of the controller:

*Flügger A/S
Islevdalvej 151
DK-2610 Rødovre
CVR no. 32788718
Tel: +45 70 15 15 05
E-mail: legal@flugger.com
Web: www.flugger.com*

Contact regarding data protection:

If you have any questions regarding our processing of your data, please do not hesitate to contact Legal. You can contact Legal via the address specified above.

Our processing of personal data

Categories of personal data

The data we process about you may include:

Data about current and former customers

- General personal data, including
 - identification data, including name, address, phone number and e-mail
 - purchase history
 - payment history, payment details as well as salary details and tax assessment notice, if relevant, in connection with credit scoring and creation of loans
 - data from our correspondence with you
- Civil registration number
 - civil registration number in connection with credit scoring and creation of loans as well as signatures on documents

Purpose and legal basis

Our data processing serves the following purposes:

- Administration of customer relations, maintenance and canvassing of customer relations and ongoing trade
- Statistical purposes: Trade will be analysed and general customer data being collected will be reported.

The legal basis for our processing of personal data is:

- For processing of personal data in connection with your orders and purchases, including delivery, credit and payment, the legal basis for our registration of the data follows from section 6(1) of the Danish Processing of Personal Data Act; see point (b) of Article 6(1) of the General Data Protection Regulation, on processing which is necessary to enter into a contract and for the performance of the contract.
- When we register data required according to the Danish Bookkeeping Act or as part of the reporting duty to the tax authorities, the legal basis follows from section 6(1) of the Danish Processing of Personal Data Act; see point (c) of Article 6(1) of the General Data Protection Regulation on processing which is necessary for compliance with a legal obligation to which the controller is subject.
- The legal basis for our collection and registration of data on the use of the other personal data follows from section 6(1) of the Danish Processing of Personal Data Act; see point (f) of Article 6(1) of the General Data Protection Regulation on processing necessary for the purposes of the legitimate interests which are not overridden by the interests of the data subjects. The legitimate interest that warrants processing is the interest of promoting Flügger's business and providing customers with the best service and good offers.
- Disclosure of data about you is subject to the provisions on processing of the Danish data protection legislation and other Danish legislation. In each individual case, we will assess whether disclosure requires your express consent or whether disclosure can take place subject to another legal basis.
- If we disclose the general customer data to other companies in the Flügger group for marketing purposes, we will comply with statutory requirements on the special procedures to be followed, including your right to object. Our disclosure will be in accordance with the conditions in point (f) of Article 6(1) of the General Data Protection Regulation on processing necessary for the purposes of the legitimate interests which are not overridden by the interests of the data subjects. The legitimate interest that warrants processing is the interest of promoting Flügger's business and provide our customers with the best service and good offers.
- Statistical purpose: The legal basis for data processing for statistical and scientific purposes only, follows from section 6(1) of the Danish Processing of Personal Data Act; see point (e) of Article 6(1) of the General Data Protection Regulation on processing which is necessary for the performance of a task carried out in the public interest. Only data necessary for the investigation are used and data are not used for other than purely statistical purposes.

Categories of recipients

We disclose or transfer personal data to the following categories of recipients:

- Banks in connection with management of payments
- Debt collection and credit reporting agencies in case of non-payment of loans/credits and searches in credit reporting agency in connection with loan application.
- Tax authorities or other authorities in connection with statutory reporting
- Other companies in the Flügger group as part of marketing initiatives subject to current rules
- Our processors on the basis of processor contracts

Erasure

We erase data about you when they are no longer necessary.

Flügger generally follows the deadline for storage set out in the Danish Bookkeeping Act. To ensure correct handling of recurrent customer relations, potential complaints, warranty commitments and to meet our obligations, we find it necessary to save all data for up to five years plus the current year from termination of the business relationship.

For future and potential customers covered by marketing-related activities, we follow the current provisions of the Danish Marketing Practices Act and principles of good marketing practice.

Your rights

According to legislation, you have certain rights in relation to our processing of data about you.

If you want to exercise your personal data rights, please do not hesitate to contact us. See our contact details at the beginning of this policy.

If you want access to change or erase data about you or object to our data processing, we will check whether it is possible and respond to your request as soon as possible and no later than one month after we have received your request.

Your rights

- *Right to see data (access right):* You have the right to access the data we process about you and a range of other data.
- *Right to rectification (change):* If you believe that the personal data we process about you are inaccurate, you have the right to have them changed. Please contact us and tell us about the inaccuracies and how they can be changed. In any case, we need to consider if we believe that your request is justified. When you contact us with a request to have your personal data changed or erased, we will check whether the conditions are met and if so, we will make the changes or erasure as soon as possible.
- *Right to erasure:* We generally erase personal data when they are no longer necessary. In special cases, you are entitled to have specific data about you erased before the deadline for our

general erasure. This applies if, for instance, you withdraw your consent and we have no other basis for processing the data. If you believe that your data are no longer necessary for the purposes for which they were originally collected, you may request to have them erased. You can also contact us if you believe that your personal data are processed contrary to legislation or any other legal obligations.

- *Right to restriction of processing:* If you contest the data we have registered or otherwise process, you may request us to restrict the processing of the data until we have had the opportunity to determine whether the data are correct. You may also request a restriction rather than erasure if you believe that our processing of the data is unlawful or if you believe that we no longer need the data, or if you believe that your legitimate interests override the legitimate interests of the controller. If you are successful in claiming that our processing has to be restricted, in future we may only process data subject to your consent or for the establishment, exercise or defence of legal claims or to protect a person or important public interests.
- *Right to transmit data (data portability):* You are entitled to receive personal data you have made available to us and personal data we have collected about you from other actors based on your consent. If we process data about you as part of a contract to which you are a party, you are also entitled to receive your data. You are also entitled to transfer these personal data to another service provider. You may also request us to have the details sent directly from the controller to another authority or company. If you want to exercise your right to data portability, you will receive your personal data from us in a commonly used and machine-readable format.
- *Right to object:* You have the right to object to our processing of data about you. You may also object to our use or disclosure of your data for marketing purposes. You can use the contact details at the beginning of this policy to send an objection. If your objection is justified, we will make sure to stop processing the data.
- *Right to receive data about new purposes:* If we want to use data about you for a purpose other than the purposes we have previously told you about, e.g. in this privacy policy, you are entitled to be told thereof before we further process the data for such other purpose.
- *Right to withdraw your consent:* If our processing of your data is based on your consent, you may withdraw the consent at any time. If you withdraw the consent, we are not allowed to process the data in future. Withdrawal of your consent will not affect the lawfulness of the processing already carried out prior to the withdrawal. If we have a lawful basis for processing other than consent with an independent purpose – e.g. storing data for the purpose of complying with the bookkeeping rules – such processing can still be carried out.

If you are not satisfied with our response or if you do not approve of the way in which your personal data have been processed, you can complain to the Danish Data Protection Agency.

You will find the contact details of the Danish Data Protection Agency on www.datatilsynet.dk.