

# PRIVACY POLICY AT LEMVIGH-MÜLLER

## 1. DATA CONTROLLER

Lemvigh-Müller A/S is the data controller for the processing of any personal data that is necessary for the handling of:

- Working relations of clients and vendors at Lemvigh-Müller

Lemvigh-Müller ensures that your personal data is processed in accordance with applicable laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council on General Data Protection ('the Regulation') and supplementary Danish law, and has therefore adopted this Privacy Policy.

Contact information

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## 2. BASIC PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

Lemvigh-Müller ensures that the personal data we record and store are processed fairly and transparently. We process all personal data in accordance with the basic principles of good data processing practices, which ensures that personal data:

- Is processed in a legal, fair and transparent manner
- Is solely collected for explicitly stated and legitimate purposes and not further processed in a manner that is incompatible with these purposes
- Is sufficiently relevant and limited to what may be necessary related to these purposes
- Is correct and, if necessary, up to date
- Is only stored for as long as required for these purposes
- Is adequately secured and kept confidential.

## 3. PROCESSING OF PERSONAL DATA

### *3.1 The background of Lemvigh-Müller's processing of personal data for clients and vendors*

In order to ensure correct processing of client and vendor contacts, Lemvigh-Müller processes certain personal data from individuals, as stated when the person is entered into Lemvigh-Müller's systems. Lemvigh-Müller only processes the personal data from client and vendor contacts that is necessary, relevant and sufficient for the purposes defined below.

### *3.2 Lemvigh-Müller collects and stores personal data from clients and vendors for specific purposes.*

Lemvigh-Müller collects and stores personal data from clients and vendors related to the following:

- Entering the person in any relevant Lemvigh-Müller systems
- E-mail history regarding case handling related to day-to-day operations and business
- Negotiated trading agreements
- Distribution and notifications via text messages
- Marketing the person has consented to
- Invoicing and bookkeeping
- Implementing general administrative procedures for external contacts, such as
- Creating and maintaining personal contact data
- Registering logins on relevant systems
- Creating statistics based on external contacts' personal data for operational and controlling purposes. Statistical materials are used solely for internal purposes, while results on an overall level are published in annual reports and on our website.

We do not collect, record and store any more personal data than what is required for the specific purpose.

### *3.3 The legal basis of Lemvigh-Müller's processing of personal data*

Our processing of your personal data is based on the following legal basis:

- Your consent, as per Article 6, subsection 1, paragraph A, and Article 9, subsection 2, paragraph A of the Regulation.

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- Lemvigh-Müller's contractual or legal obligations, as per Article 6, subsection 1, paragraph B of the Regulation in order to fulfil a contract or as per Article 6 subsection 1, paragraph C in order to fulfil a legal obligation
- Lemvigh-Müller's legitimate interests, as per Article 6, subsection 1, paragraph F, which takes precedence over your interests and basic rights. This includes the processing of your personal data in order to create statistics or to estimate at any time whether Lemvigh-Müller's purpose and statutes have been met.
- If Lemvigh-Müller has a legal basis for collecting and processing any of your personal data not covered by the above, Lemvigh-Müller will inform you of any such basis and our legitimate interest in processing your personal data.

## *3.4. Lemvigh-Müller will only disclose your personal data if necessary.*

Lemvigh-Müller will not disclose personal data belonging to client and vendor contacts to any third parties unless this is necessary in relation to the handling of client and vendor functions when cooperating with Lemvigh-Müller. Instances where we can disclose customers' and vendors' personal data include:

- Disclosure of personal data to co-organizers for courses and events
- Disclosure of personal data to an authority, if we are legally obliged to do so

In cases where a data processor or a sub processor transfers personal data to countries outside the EU/ECC, the conditions will appear in the contract with the processor/sub processor

## *3.5. Lemvigh-Müller does not store your personal data for any longer than necessary.*

Lemvigh-Müller only stores client and vendor personal data for as long as is necessary for the purpose. Lemvigh-Müller therefore deletes customers' and vendors' personal data when we no longer need to store it in relation to the purpose(s) and legal basis for which it is processed.

## *3.6. Lemvigh-Müller keeps your personal data up to date*

Lemvigh-Müller continuously checks that the personal data processed by Lemvigh-Müller from customer and vendor contacts is correct, and we ensure that the personal data we store is constantly updated. As our case processing is dependent on having correct personal data of customer and vendor contacts, we ask customer and vendor contacts to inform us of any relevant changes to their personal data.

## *3.7. Data processing safety and security*

Lemvigh-Müller has implemented internal rules on information safety. These rules include instructions and precautions that protect your personal data from being destroyed, lost or modified, from unauthorized disclosure and from allowing unauthorized people from accessing or gaining knowledge of them.

## *3.8. Use of cookies*

Lemvigh-Müller uses cookies on its website in accordance with the guidelines stated in our cookie notice which can be read when you visit the website.

## **4. AUTHORISATIONS**

### *Right to revoke your consent*

You may at any time revoke your consent to the processing of your personal data. If you decide to revoke your consent, please note that Lemvigh-Müller in some cases may be entitled to continue the processing, e.g. where Lemvigh-Müller has a different legal basis for the processing of your personal data. We will notify you if this is the case.

### *Right to insight*

You have the right at any time to be informed by Lemvigh-Müller which personal data we process about you, where they originate from, the purpose of the processing, whether we disclose personal data to any third parties and for how long we store your personal data or the criteria used to determine this time period. Upon request, Lemvigh-Müller can send you a copy of your personal data that we process. However, access to this information may be limited to ensure the privacy of other persons, as well as business secrets and intellectual property rights.

### *The right to correct or delete the processing of your personal data*

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You are entitled to have Lemvigh-Müller correct any incorrect personal data about yourself. In such cases, please contact us at [persondata@lemu.dk](mailto:persondata@lemu.dk) and state what the inaccuracies are and how to correct them. You also have the right to have Lemvigh-Müller delete all of some of your personal data if you believe it is no longer necessary for the stated purpose(s) or you believe that your personal data is being processed in violation of the law or other legal obligations. If you revoke your consent, Lemvigh-Müller is obligated to delete your personal data unless we have the right to process it in accordance with another Act. If you request us to correct or delete your personal data, we will investigate whether the terms and conditions are met and, if necessary, make changes or deletions as soon as possible.

## *The right to object to the processing of personal data*

You have the right to object to our processing your personal data. Please send your objection to [persondata@lemu.dk](mailto:persondata@lemu.dk). If you object, Lemvigh-Müller may no longer process your personal data unless we can demonstrate important and legitimate reasons for processing them. Any such reasons must take precedence of your interests, rights and liberties, or the processing must be required for a legal claim to be established, enforced or defended. If Lemvigh-Müller does not believe your opposition is warranted, we will inform you accordingly.

## *Complaints to the Danish Data Protection Agency (Datatilsynet)*

You may at any time submit a complaint to the Danish Data Protection Agency (Datatilsynet) about Lemvigh-Müller's processing of your personal data. For more information, see [www.datatilsynet.dk](http://www.datatilsynet.dk).