

Kontrapunkt Group's personal data policy

Kontrapunkt Group processes personal information about our website's users, employees of the Kontrapunkt Group (all companies owned by Kontrapunkt Group) and our customers. We protect this personal data and are at all times compliant with current legislation with regard to the protection of the personal data we process.

It is always our aim to maintain a high level of protection for personal data.

Any changes to our personal data policy can be found at kontrapunkt.com and everland.dk.

How we protect personal data

Kontrapunkt Group processes personal data in a manner that is legal, reasonable and transparent.

Accordingly, we have adopted appropriate technical and organisational measures to ensure that personal data is always protected against loss, manipulation and unauthorised access. We adjust our security measures on an ongoing basis to ensure that they are appropriate to current technological developments.

What personal information do we process?

Kontrapunkt Group only processes personal data when we have a legal processing basis to do so. This basis is typically acquired when the data subject has given written consent to the processing by Kontrapunkt Group of various specific items of data about the person in question.

Kontrapunkt Group only stores personal data for as long as is necessary and only with a view to fulfilment of the purpose required by the processing. We have clear rules to assure that data is not stored for any longer than necessary.

When do we pass on personal data?

Kontrapunkt Group never passes personal data on to external (i.e. third) parties unless we have been given permission to do so by the data subject, if there is a legal justification for doing so or if we are ordered to do so by the judiciary.

With a view to further protecting against the dissemination of personal data, all Kontrapunkt Group employees are subject to a duty of confidentiality. In other words, we neither disclose nor use the confidential data we gain knowledge about through our work without authorisation.

Security assurance of third party processing

Kontrapunkt Group may employ data processors who are not part of the Kontrapunkt Group. External data processors only process personal data on Kontrapunkt Group's behalf with a view to the specific purposes for which the data was collected and only in accordance with the instructions of Kontrapunkt Group. We have a number of minimum security requirements for the protection of the personal data to which Kontrapunkt Group's data processors must always comply.

As a rule, Kontrapunkt Group does not disclose personal data to countries outside the European Union and EEA, but this may become necessary in order to comply with a legal or contractual obligation to which Kontrapunkt Group is subject. In such instances, Kontrapunkt Group will agree with the relevant sub-contractors that the data processing must be performed in compliance with EU/EEA regulations, with a view to assuring a high level of protection. Such agreements ensure that sub-contractors' processing of personal data is in compliance with current EU/EEA data protection regulations. The terms and conditions set out in the agreements will always be compliant with the requirements of the European Commission and current data protection legislation.

The right to insight and "the right to be forgotten"

You have the right to insights into and to amend and delete the personal data about you that we have recorded and that we process. Should you wish to do so, please write to Kontrapunkt Group, Nikolaj Plads 2, fourth floor, DK-1067 Copenhagen K

You should expect to hear from us within two months of our receipt of your inquiry.

In reply to your inquiry, we will inform you of which data we can delete immediately and which data we are required by law to retain.

How to lodge a complaint

If you wish to complain about the way we process data about you, you should write to our complaints manager at Kontrapunkt Group.

Attn.: Flemming Mortensen, Kontrapunkt Group, Nikolaj Plads 2, fourth floor, DK-1067 Copenhagen K.

If your inquiry is not upheld, **write to:** The Danish Data Protection Agency, Borgergade 28 floor 5, DK-1300 Copenhagen K.