

General Privacy Policy

1. Introduction

- 1.1 Conaxess Trade (or “we/us”) wants to ensure a high and adequate level of data protection as privacy is a keystone in gaining and maintaining the trust of our employees, customers and suppliers and thus, ensuring Conaxess Trade’s business in the future.

The protection of personal data requires that appropriate technical and organisational measures be taken to demonstrate a high and adequate level of data protection. Conaxess Trade has adopted a number of internal and external data protection policies, which must be adhered to by employees of Conaxess Trade. A list of data protection policies can be found in Appendix 1.

Additionally, Conaxess Trade will monitor, audit and document internal compliance with the data protection policies and applicable statutory data protection requirements, including the General Data Protection Regulation (“GDPR”). A description of the internal monitoring, auditing and documentation requirements can be found in Appendix 2.

Conaxess Trade will also take the necessary steps in order to enhance data protection compliance within the organisation. These steps include the assignment of responsibilities, awareness raising and training of staff involved in processing operations.

Below is the internal general privacy policy with guidelines for processing of personal data, which constitute the overall framework for processing of personal data within Conaxess Trade.

- 1.2 “*Personal data*” is all information which may be related to an identified or identifiable natural person (the data subject). Personal data covers a wide range of information and includes general information such as name, address, phone number, age, gender, etc. but also special categories of personal data (sensitive personal data) and confidential information such as health information, account number, identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.3 Although, information regarding companies/businesses is not as such personal data, please note that information relating to your contacts within such companies/businesses, e.g. name, title, work email, work phone number, etc. is considered personal data.
- 1.4 Conaxess Trade collects and uses personal data for a variety of legitimate business purposes, including establishment and management of customer and supplier relationships, completion of purchase orders, recruitment and

management of all aspects of terms and conditions of employment, communication, fulfilment of legal obligations or requirements, performance of contracts, providing services to customers, etc.

1.5 Personal data shall always be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Conaxess Trade shall be responsible for and be able to demonstrate compliance with this clause as part of Conaxess Trade's accountability.

2. Legal basis for processing personal data

2.1 Processing of personal data requires legal basis. The most predominant legal bases for processing personal data within Conaxess Trade are:

- Consent from the data subject
- The performance of a contract
- A legal obligation or requirement
- Legitimate interests pursued by Conaxess Trade

2.2 Consent

2.2.1 If the collection, registration and further processing of personal data on customers, suppliers and other business relations are based on such a persons'

consent to the processing of personal data for one or more specific purposes, Conaxess Trade shall be able to demonstrate that the data subject has consented to processing of such personal data

2.2.2 Consent shall be:

- Freely given
- Specific
- Informed
- Unambiguous

The data subject must signify agreement to the processing of personal data by a statement or by a clear affirmative action, to him/her.

2.2.3 A request for consent shall be presented in a manner, which is clearly distinguishable from other matters, in an intelligible and easily accessible form, using clear and plain language.

2.2.4 To process special categories of personal data (sensitive personal data) the consent shall also be explicit.

2.2.5 The data subject is entitled to withdraw his/her consent at any time and upon such withdrawal, we will stop collecting or processing personal data about that person unless we are obligated or entitled to do so based on another legal basis.

2.3 Necessary for the performance of a contract

2.3.1 It will be legitimate to collect and process personal data relevant to the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. This applies to all sorts of contracts and agreements, including purchase orders, customer supply contracts, supplier contracts and employment agreements, etc. This also applies to the pre-contractual phase irrespective of the success of the contract negotiation or not.

2.4 Comply with a legal obligation

2.4.1 Conaxess Trade has to comply with various legal obligations and requirements, which have basis in Union or Member State law. Such legal obligation, to which Conaxess Trade is subject, may be sufficient as a legitimate basis for processing of personal data.

2.4.2 Such legal obligations include obligations to collect, register and/or make available certain types of information relating to employees, customers, etc. Such legal requirements will then form the legal basis for us to process the personal data, however, it is important to note whether the provisions allowing or requiring

Conaxess Trade to process certain personal data also set out requirements in relation to storage, disclosure and deletion.

2.5 Legitimate interests

2.5.1 In many cases our processing of personal data will be based on *“the balance of interest”* rule. Pursuant to the balance of interest rule, Conaxess Trade is allowed to process personal data if the processing is necessary for the purposes of the legitimate interests pursued by Conaxess Trade, and these interests are not overridden by the interests of the data subject. For instance, it is a legitimate interest of Conaxess Trade to process personal data on potential customers in order to expand the business and develop new business relations. The Data Subject must be given information on the specific legitimate interest if a processing is based on this provision, cf. section 4.1 below.

3. Disclosure and transfer of personal data

3.1 Use of data processors

3.1.1 An external data processor is a company, which processes personal data on behalf of Conaxess Trade and in accordance with Conaxess Trade’s instructions, e.g. in relation to HR systems, third party IT providers, etc. When Conaxess Trade outsources the processing of personal data to data processors, Conaxess Trade ensures that said company as a minimum applies the same degree of data protection as Conaxess Trade. If this cannot be guaranteed, Conaxess Trade will choose another data processor.

3.2 Data processing agreements

3.2.1 Prior to transfer of personal data to the data processor, Conaxess Trade shall enter into a written data processing agreement with the data processor. The data processing agreement ensures that Conaxess Trade controls the processing of personal data, which takes place outside Conaxess Trade for which Conaxess Trade is responsible for. The data processing agreement shall be prepared in accordance with Conaxess Trade’s data processing agreement templates, which available if an inquiry is sent to Conaxess Trade Denmark’s HR department.

3.2.2 With respect to Conaxess Trade entities acting as data processors on behalf of other group entities, cf. clause 6.2 below, Conaxess Trade must ensure that any sub-data processor has executed a sub-data processing agreement with Conaxess Trade, before transferring personal data to such sub-data processor.

3.2.3 If the data processor/sub-data processor is located outside the EU/EEA, please refer to clause 3.3.4 below.

3.3 Disclosure of personal data

- 3.3.1 Before disclosing personal data to others, please consider whether the recipient is employed in Conaxess Trade or not. You can share personal data with other employees of Conaxess Trade, if Conaxess Trade has a legitimate business purpose in the disclosure.
- 3.3.2 It is your responsibility to ensure that the recipient has a legitimate purpose for receiving the personal data and to ensure that sharing of personal data is restricted and kept to a minimum.
- 3.3.3 You must be even further cautious before sharing personal data with persons or entities outside Conaxess Trade. Personal data shall only be disclosed to third parties acting as individual data controllers if a legitimate purpose for such transfer exists. If the recipient is acting as a data processor please refer to clause 3.1 above.
- 3.3.4 If the third party recipient is located outside the EU/EEA in a country not ensuring an adequate level of data protection, the transfer can only be completed if a transfer agreement has been entered into between Conaxess Trade and the third party. The transfer agreement shall be based on the EU Standard Contractual Clauses. Please contact Conaxess Trade Denmark HR department in such case.

4. Rights of the data subjects

4.1 Duty of information

- 4.1.1 When Conaxess Trade collects and registers personal data on data subjects, e.g. employees, job applicants, customers, suppliers, other business partners, etc., Conaxess Trade is obligated to inform such persons about the
- The purposes of the processing for which the personal data are intended as well as the legal basis for the processing
 - The categories of personal data concerned
 - Where the processing is based on a balancing of interests, the legitimate interests pursued by Conaxess Trade
 - The recipients or categories of recipients of the personal data, if any
 - Where applicable, the fact that Conaxess Trade intends to transfer personal data to a third country and the legal basis for such transfer
 - The period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period
 - The existence of the right to request from Conaxess Trade access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability

- Where the processing is based on the data subject's consent, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal
- The right to lodge a complaint with a supervisory authority
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data
- The existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

This information will in most cases be provided via a privacy notice on Conaxess Trade's home page.

4.2 Right to access

4.2.1 Any person whose personal data Conaxess Trade is processing, including Conaxess Trade employees, job applicants, external suppliers, customers, business partners, etc. has the right to request access to the personal data which Conaxess Trade processes or stores about him/her.

4.2.2 If Conaxess Trade processes or stores personal data about the data subject, the data subject shall have the right to access to the personal data and the following information:

- The purposes of the processing
- The categories of personal data concerned
- The purposes of the processing
- Recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- The existence of the right to request from Conaxess Trade rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- The right to lodge a complaint with a supervisory authority

- Where the personal data are not collected from the data subject, any available information as to their source
 - The existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject
- 4.3 The data subject shall have the right to obtain from Conaxess Trade without undue delay the rectification of inaccurate personal data concerning him or her
- 4.4 The data subject shall have the right to obtain from Conaxess Trade the erasure of personal data concerning him or her without undue delay and Conaxess Trade shall have the obligation to erase personal data without undue delay, if applicable.
- 4.5 The data subject shall have the right to obtain from Conaxess Trade restriction of processing, if applicable.
- 4.6 The data subject shall have the right to receive the personal data registered in a structured and commonly used and machine-readable format, if applicable.
- 4.7 The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on a balancing of interests, including profiling.
- 4.8 Any request received from a data subject to exercise the rights in this clause is answered as soon as reasonably possible, and no later than 30 days from receipt. Requests shall be forwarded without delay to Conaxess Trade Denmark's HR department. Conaxess Trade Denmark's HR department will be supported by relevant stakeholders to process the request to meet the reply deadline.

5. Data Protection by Design and Data Protection by Default

- 5.1 New products, services, technical solutions, etc. must be developed so that they meet the principles of data protection by design and data protection by default.
- 5.1.1 Data protection by design means that when designing new products or services due consideration to data protection is taken.
- Conaxess Trade will take into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing
 - Conaxess Trade shall, both at the time of the determination of the means for processing and at the time of the processing itself, implement appropriate technical and organisational measures, such as pseudonymisation, which are designed to implement data protection principles, such as data minimisation,

in an effective manner and to integrate the necessary safeguards into the processing in order to meet data protection requirements and protect the rights of data subjects

5.1.2 Data protection by default requires that relevant data minimisation techniques are implemented.

- Conaxess Trade shall implement appropriate technical and organisational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed
- This minimisation requirement applies to the amount of personal data collected, the extent of their processing, the period of their storage and their accessibility
- Such measures shall ensure that by default personal data are not made accessible without careful consideration

6. Records of processing activities

6.1 Conaxess Trade shall as controller maintain records of processing activities under Conaxess Trade's responsibility. The records shall contain the following information:

- The name and contact details of Conaxess Trade/all Conaxess Trade entities
- The purposes of the processing
- A description of the categories of data subjects and of the categories of personal data
- The recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organisations
- Where applicable, transfers of personal data to a third country, including the identification of that third country and, if relevant, the documentation of suitable safeguards
- Where possible, the envisaged time limits for erasure of the different categories of data
- Where possible, a general description of the applied technical and organisational security measures

6.1.1 Conaxess Trade shall make the records available to relevant data protection authorities upon request. If you receive such request please contact Conaxess Trade Denmark HR department.

6.2 CONAXESS TRADE as data processor

6.2.1 As a data processor, Conaxess Trade shall maintain records of all categories of processing activities carried out on behalf of a data controller, containing:

- The name and contact details of Conaxess Trade and of each controller on behalf of which Conaxess Trade processes data
- The categories of processing carried out on behalf of each controller
- If applicable, transfers of personal data to a third country, including the identification of that country and, if relevant, the documentation of suitable safeguard
- Where possible, a general description of the applied technical and organisational security measures

7. Deletion of personal data

7.1 Personal data shall be deleted when Conaxess Trade no longer has a legitimate purpose for the continuous processing or storage of the personal data or when it is no longer required to store the personal data in accordance with applicable legal requirements.

7.2 Detailed retention periods with respect to various categories of personal data are specified in the Conaxess Trade local entities HR policies. With respect to HR data, please refer to Conaxess Trade's HR policy regarding processing of personal data which can be accessed if an inquiry is forwarded to the relevant entity.

8. Assessment of risk

8.1 If Conaxess Trade processes personal data, which are likely to result in a high risk for the persons whose personal data are being processed, a Data Protection Impact Assessment (DPIA) shall be carried out.

8.1.1 A DPIA implies that Conaxess Trade will, taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, implement appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with data protection requirements.

8.2 The technical and organisational measures shall be reviewed and updated where necessary and not later than every 6 months.

- 8.2.1 Adherence to approved codes of conduct or approved certification mechanisms may be used as an element by which to demonstrate compliance with the appropriate technical and organisational measures pursuant to this clause.
- 8.2.2 The measures referred to in paragraph 1 shall include the implementation of an IT security policy, which shall be complied with at all times.

9. National requirements

- 9.1 All Conaxess Trade entities shall comply with both the GDPR and national data protection legislation.
- 9.2 National legislation may include provisions regarding the processing of personal data which contradict the policies and guidelines on data protection established in Conaxess Trade.
- 9.3 If applicable national legislation requires a higher level of protection for personal data than such policies/guidelines, such stricter requirements are to be complied with. If Conaxess Trade's policies/guidelines are stricter than the local legislation, our policies/guidelines must be complied with.

10. Contact

- 10.1 If you have any questions regarding the content of this policy, please contact Conaxess Trade Denmark's HR department.