

Genan A/S

Personal Data Processing Policy – customers & business partners

How Genan A/S processes personal data on customers, suppliers etc.

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1. Introduction

This policy is part of the compiled company documentation showing that Genan A/S complies with current personal data legislation.

It is part of daily work routines at Genan to process a number of personal data on all our customers and business partners. Genan always collects and processes personal data in compliance with current personal data legislation, and Genan only processes personal data if there is justified reason for such processing.

Genan is very much aware that all personal data must be processed securely and confidentially. Genan is furthermore aware that only personal data necessary to meet the purpose may be processed, and that such data may only be passed on to any third party, if there is a specific and justified reason to do so.

Genan's processing of personal data complies with current regulations – including security requirements prescribed by the General Data Protection Regulation (GDPR). Genan regularly goes through personal data registered, deleting data which it is no longer relevant to process. Genan also deletes personal data, which a customer or business partner requests us to delete, and which Genan no longer has reason to process.

In the following, you can read more about Genan's guidelines for the processing of personal data on our customers, business partners and the like.

1.1 Data controller

Genan is considered as data controller in relation to personal data collected on customers, business partners etc. Please find below all relevant contact details:

Company name:	Genan A/S
Address:	Jegindøvej 16, DK-8800 Viborg
VAT no.:	DK54480911
E-mail:	genan@genan.eu

All inquiries relating to this policy or Genan's handling of personal data in general must be directed to genan@genan.eu.

2. Personal data processing and its purpose

2.1 In connection with enquiries received

When you make an enquiry to us per e-mail, via our website or through the social media, we process the personal data evident from your enquiry. If e.g. you contact us on LinkedIn, we will – through LinkedIn – receive certain information about you such as your name and photo. The amount of information shared with us depends on the privacy settings on your LinkedIn profile. The same applies if you fill in the contact form on our website.

When you contact us by phone, we will, if relevant, note your name and the purpose of contact made. This registration enables us to follow up – and serves as documentary evidence of such enquiry from a customer. You should thus bear in mind that relevant information shared with us over the phone will in some cases be registered in our system.

2.2 In connection with the formation of contracts

We contract with B2B customers only, but as agreements are always signed by an individual, we will typically process a number of personal data on this contact person. In this case, we register the name, e-mail address, direct phone number and mobile no. of the person in question, allowing us to make contact.

In some cases, we furthermore register information relating to said contact person's special interests or preferences in relation to our products. This allows us to offer relevant customer support and to follow up with customers, business partners etc. Moreover, we register meeting minutes from meetings with our customers, so we can follow up on agreements made with each customer.

Our electronic data is stored with an external hosting provider. Physical documents handled are stored at our headquarters in Viborg. The processing of your personal data is kept separate from all other case handlings, and only personnel with special authorisation has access to relevant personal data.

2.3 In connection with payments made

The Genan accounts receivable department keeps a register of the names, addresses, phone and fax numbers as well as e-mail addresses of all customers. If a customer in question is a company, we will typically register company name and contact information; but a contact person may also be linked to the customer account in question.

All data is registered in our ERP system and is used in connection with settlement for agreed services only.

2.4 In connection with attendance at events

If Genan hosts an event for which it is necessary to register to attend, Genan will process the contact details of attendees at this event in the form of their name, workplace, job title and e-mail address. The purpose of this processing is to handle attendance registrations for the event.

We subsequently keep registration lists for up to one year in order to be able to evaluate and optimise our events.

If you attend an event, please take note that we may in some cases take photos / mood pictures from the event and share them on our website and/or social media. The purpose of such sharing of photos is to brand events held as well as the company in general. If you do not wish to be included in such mood pictures, you may let us know at the beginning of the event.

2.5 Other circumstances

2.5.1 Video surveillance

Take note that certain areas at Genan are monitored through video surveillance. Monitoring takes place for security reasons and for crime prevention.

Video surveillance is active 24-7 and is notified through signage in the area. Genan has taken security measures to prevent unauthorised access to recordings. Consequently, only relevant Genan personnel has access to recordings.

Recordings will only be viewed, if Genan suspects a criminal offence or other security incident. Recordings which leave no specific suspicion of criminal offences, will be deleted after 30 days.

If a criminal offence is unveiled, it will be reported to the police, and recordings will be passed on to the police for further investigation. Genan will delete recordings after the investigation or when requested to do so by the police.

2.5.2 Use of Genan's network

All Genan locations offer wireless internet connection.

Guests, whose identity is known to Genan, can get the password to the guest network and connect their own equipment – provided that this equipment does not interfere with other systems. The network can and may only be used for internet access; – direct access to internal systems from the guest network is prohibited.

3. Termination of customer/partner relations and retention period

The Danish Act on Processing of Personal Data does not determine when personal data must be deleted. This is for Genan as data controller to decide from case to case. When making this decision, Genan should particularly assess whether there is justified reason to continue to retain data – or whether Genan is obliged by law to keep certain information or documents.

Genan has resolved that the ability to document the history of a relationship with a customer or business partner justifies retention – as this allows us to see previous steps taken in relation to you as customer or business partner. According to our data destruction procedures, personal data used to administer a contractual relationship will thus not be deleted until the contractual relationship has been terminated.

Genan does, however, always keep contracts and other agreements or correspondence relating to such agreement for 5 years after the termination of a customer/partner relationship. We do this to comply with the retention requirements of the Danish Bookkeeping Act – and to document agreements made.

We furthermore keep all bookkeeping records for 5 years after the end of the financial year, during which the bookkeeping was made. We do this to comply with the retention requirements of the Danish Bookkeeping Act too. We also refrain from deleting personal data, if it is necessary to keep such data to determine or justify a claim – e.g. in the event of a legal

dispute or subsequent to a financial claim between Genan and the customer/business partner in question.

Other personal data is deleted on a regular basis, when we conclude that we no longer have justified reason to process this data. When making this assessment, we look at the purpose of processing the personal data in question – compared to your interest in the destruction of data.

4. Security and transmission of personal data

Genan processes all personal data confidentially. We have taken a number of technical and organisational measures in order to protect your personal data against any unlawful or accidental destruction, damage or loss – as well as to ensure that unauthorised persons do not gain access to your data, and that your data is neither abused nor processed in any other way than in compliance with current regulations on personal data processing and protection.

In addition to having access to your personal data ourselves, Genan has furthermore given a number of data processors access. We use data processors in connection with e.g. operational and IT-related security tasks (such as backup, website hosting etc.) which external consultants handle for us.

Such access to your data is thus solely granted when data processors render technical or system-related services to Genan – or operational support, fault finding within the scope of Genan's outsourcing. There are a number of rules governing the holding of or the granting of access to the data held by data processors, and Genan has thus signed data processing agreements with all data processors. This ensures a suitable level of security – i.a. preventing any unauthorised party from gaining access to your data.

All information is held confidential and is not passed on to any third party, unless we have specific reason to do so. Examples when we are required to pass on personal data could be the passing on of video recordings to the police in order to prevent and solve crimes, or the transfer of relevant personal data to our lawyer or accountant in connection with legal disputes or the preparation of annual accounts.

5. Your rights

In consequence of the fact that Genan processes personal data on you as a data subject, you have a number of rights. Read further in the sections below – or feel free to contact us at any time, if you have any questions in this respect. We do our utmost to reply to all enquiries as soon as possible – and within 30 days at the latest.

If we do not accommodate your request in relation to the below sections, you have the option to file a complaint with the Danish Data Protection Agency.

5.1 Right to insight into own personal data

As a data subject, you are entitled to gain insight into the personal data we process on you. A request to access your own personal data must be directed to Genan, and you need not give reasons for your request. In other words, you have the right to learn which personal data we process on you in connection with administering our relations with you as a customer/ business partner; the purpose of this processing; where we have this data from; how long we retain data for; and with whom we share this data, if at all,

5.2 Right to have incorrect personal data corrected

If Genan processes incorrect or misleading information about you, you are entitled to request that we correct this information. When we receive such request, we determine whether or not to correct this information.

5.3 Right to have personal data deleted

In some cases, we are obliged to delete your personal data. This is e.g. the case if we no longer have justified reason to process this data, if you withdraw consent, if your personal data has been processed unlawfully, or if destruction is necessary to comply with a legal obligation – and in some cases if there is an objection to this processing. Genan's procedures for data destruction respect all these rights.

5.4 Right to object

You are entitled to object to our processing of your personal data at any time. If we receive such objection from you, we will decide whether or not to limit the processing of your personal data until we have determined whether Genan's lawful interests take precedence over your interests as customer/business partner.

5.5 Data portability

In some cases, you are entitled to request that your personal data is transferred to you in a common, electronic format, so that the information may be passed on to another data controller. If technically possible, we may also transmit data directly to the new data controller.

5.6 Withdrawal of consent

If you have consented to Genan's processing of your personal data, you may withdraw your consent at any time. We will then cease to process the personal data to which your consent was related, unless we are allowed to process the personal data on other lawful grounds.

5.4 How to complain to the Danish Data Protection Agency

If you have any objections in relation to our processing of your personal data, please contact us. You do, however, also have the right to contact the Danish Data Protection Agency to complain about our processing and retention of personal data.

The contact details of the Danish Data Protection Agency are evident from its website:
www.datatilsynet.dk.