Privacy Notice

{{ datacontroller }}

{#

Question

Insert name of the company that is the data controller as to be named as reference

Logic

Name to be inserted

#}

{{ datacontroller }}, {{ datacontroller.address }}, {{ datacontroller.CVR }} (“{{ datacontroller }}, ”, “we”, “us”, “our”) will as data controller collect and process personal data about you for the purpose of {{ purpose\_of\_processing }} {#

Question

Insert short description of why {{ datacontroller }} is using the personal data

Logic

{{ purpose\_of\_processing }} = Purpose description to be inserted

Example

providing you with the services that you have requested.

Help

The purpose must be short and provide the data subject with an immediate understanding of the scope of this notice.

#}. Below you will find a description of the personal data, which we will collect and process about you as well as the purpose and on which basis we are processing the personal data.

# Types of personal data that we collect and process and legal basis {#

Question

Chose the legal basis applicable to the notice.

Logic

Data Processor to choose from one or more of option 1, option 2 or option 3:

Multiple choices

Option 1 – to fulfil an agreement:

Clause 2.1 is included and questions related to completion of question 2.1 must be the next step.

Question

Chose if the agreement regards products and/services

{{Product/services}}: multiple choices:

- product

- services

Question

Insert additional information being processed under the legal basis

{{ [insert additional information as relevant] }}: allow inclusion of further items:

(d) [\*\*]

(e) [\*\*]

(f) [\*\*]

Option 2 – to comply with a legal requirement:

Clause 2.2 is included and questions related to completion of question 2.2 must be the next step.

Question

Insert details of the law that entails a legal obligation

{{ legal\_obligation\_description }}; allow inclusion of text

Question

Insert additional information being processed under the legal basis

{{ [insert information that {{ datacontroller }} is processing for the purpose of complying with a legal obligation set out in national law] }}: allow inclusion of further items:

(b) [\*\*]

(c) [\*\*]

(d) [\*\*]

Option 3 – legitimate interest assessment:

Clause 2.3 is included and questions related to completion of question 2.3 must be the next step.

Question

Insert the legitimate purpose(s) persued by {{ datacontroller }}

{{ legitimate\_interest\_description }}: allow inclusion of text

Question

Insert additional information being processed under the legal basis

{{ [insert additional information as relevant] }} allow inclusion of further items:

(e) [\*\*]

(f) [\*\*]

(g) [\*\*]

#}

{%p if dataprocessing\_legal\_basis[“agreement”] is True %}

* 1. **To fulfil the agreement with you.** We collect and process the following personal data about you for the purpose of fulfilling the agreement, cf. Article 6.1(b) of the GDPR entered into between you and {{ datacontroller }} (to provide agreed {{ products\_or\_services }} to you):

Name

Contact information, including e-mail address and phone number

Order details

{# TODO: { insert\_additional\_information\_as\_relevant } #}

{%p endif %}

{%p if dataprocessing\_legal\_basis[“legal\_requirement”] is True %}

**To comply with a legal requirement.** We collect and process the following personal data about you for the purpose of complying with a legal requirement set out in {{ legal\_obligation\_description }}, cf. Article 6.1(c) of the GDPR which {{ datacontroller }} must comply with:

government identification number

{# TODO: { insert\_information\_that\_datacontroller\_is\_processing\_for\_the\_purpose\_of\_complying\_with\_a\_legal\_obligation\_set\_out\_in\_national\_law } #}.

{%p endif %}

{%p if dataprocessing\_legal\_basis[“legitimate\_interest”] is True %}

**Legitimate interest.** {{ datacontroller }} collect and process personal data about you for the purpose of {{ legitimate\_interest\_description }} which pursues a legitimate interests of {{ datacontroller }}, cf. Article 6.1(f) of the GDPR and it is assessed that {{ datacontroller }}’s interest in processing the personal data overrides your interests.

{{ datacontroller }} collect and processes the following personal data about you for the above purposes:

Name

Contact information, including e-mail address and phone number

Title

Workplace

{# TODO: { insert\_additional\_information\_as\_relevant } #}

{%p endif %}

# How we process your personal data {#

Question

Will {{ datacontroller }} be disclosing personal data to any third parties, e.g. group entities or third party service providers?

Check box – Yes/No

Logic

If “Yes”, include clause 3.1 and 3.2, remove alternative wording and go on to Item 1

If “No”, remove clause 3.1 and 3.2 and include alternative wording and go to item 4.

Item 1

{{ [and [third party IT service providers engaged by {{ datacontroller }} and [{{ datacontroller }}’s group entities worldwide] }}: mulitiple choise:

Question

Chose the categories of third parties that will personal data will be disclosed to

- {{ datacontroller }}’s group entities worldwide

- third party IT service providers engaged by {{ datacontroller }}

- public authorities

- other

Logic

Insert those chosen

If chose “other”: text boxes to appear

[\*\*]

[\*\*]

[\*\*]

Question

Please include the categories of third parties data is disclosed to

Logic

Insert the stated third parties

Item 2

{{ [[IT service providers], and/or [group entities]] }}: insert the categories of third parties chosen under clause 3.1.

Item 3

{{ [insert contact details of DPO or other contact point] }}

Question

Please include the contact details of where to request a copy of the transfer agreement, e.g. the Data Protection Officer or local data protection responsible

Logic

Insert the stated contact details

Item 4:

Delete {{ [NOTE – Delete before use. Amend the above wording as appropriate. If {{ datacontroller }} group entities and/or other third parties have access to the data, please include this. If data is shared with any public authorities or partners this should also be stated.] }}

Item 5:

{{ [insert retention period if possible, and if not possible, insert the fulfilment criteria upon which deletion will happen] }}

Question

If possible, please state the retention period, and if not possible, insert the fulfilment criteria upon which deletion will happen

Logic

Insert the stated text

#}

Your personal data will be accessed by {{ datacontroller }}’s employees { { [and [third party IT service providers engaged by {{ datacontroller }} and [{{ datacontroller }}’s group entities worldwide] } } on a need to know basis only.

{{ datacontroller }} will generally not disclose the data to third parties, however we will transfer your personal data to our { { [[IT service providers], and/or [group entities]] } } that are established outside of the EU/EEA. When {{ [[IT service providers], and/or [group entities]] }} process your personal data outside of the EU/EEA, such transfer of personal data will either be subject to the EU-U.S. Privacy Shield or the European Commission’s standard contractual clauses. You can request a copy of the agreement covering the transfer of personal data by sending an e-mail to {{ [insert contact details of DPO or other contact point] }}.

# {%p if Alternative\_wording %}

{{ datacontroller }} will generally not disclose the data to third parties, and we will not transfer your personal data outside of the EU/EEA. }}  
{%p endif %}

{# [**NOTE – Delete before use**. Amend the above wording as appropriate. If {{ datacontroller }} group entities and/or other third parties have access to the data, please include this. If data is shared with any public authorities or partners this should also be stated.] #}

{{ datacontroller }} will keep your personal data for as long as is needed to fulfill our purposes of processing {{ [insert retention period if possible, and if not possible, insert the fulfilment criteria upon which deletion will happen] }}, unless {{ datacontroller }} is required under applicable law to keep your personal data for a longer period.

# Automated decisions {#

Question

Will {{ datacontroller }} be using automated decisions?

Check box – Yes/No

Logic

If “Yes”, include clause 4.1 and 4.2, remove note and move on to item 1

If “No”, remove clause 4.1 and 4.2, remove note

Item 1

{{ [An example is our fraud prevention and detection efforts on our online platforms.] }}

Question

Include explanation of the automated decision-making involving processing of personal data

Logic

Insert the stated text

#}

{{ datacontroller }} use automated decision-making in processing your personal data for some services and products. {{ [An example is our fraud prevention and detection efforts on our online platforms.] }}

You may request that {{ datacontroller }} provides information about the decision-making methodology and ask us to verify that the automated decision has been made correctly. We may reject the request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias.

[**NOTE – Delete before use**. Amend or delete the above wording as appropriate. If {{ datacontroller }} group entities and/or other third parties uses other means of automated decisions, e.g. AI in approving customers etc. this needs to be included.]

# Your rights {#

Item 1

{{ **The right to data portability**. You can obtain a copy of your personal data in a structured, commonly used and machine-readable format by contacting us by using the contact details in section 5. If technically feasible, you may request that the personal data is transmitted directly to another company or person acting as a data controller. }}:

Logic

- If Option 3 under clause 2 have been chosen, include wording and remove the note

- If Option 3 under clause 2 have not been chosen, remove wording and remove the note

Item 2:

{{ [You can read more about your rights in the Danish Data Protection Agency’s guidelines on the data subjects’ rights, which is available at [www.datatilsynet.dk](http://www.datatilsynet.dk).] }}

Question

Do you want to include the following wording an provide more guidance to the data subjects? (This is not a legal requirement)

Check box:

- Yes

- No

Logic

If “Yes” – insert the text

If “No” – remove the text

# #}

**The right to information and access**. You have the right to ask us for information about or access to your personal information. There are some exemptions, which means you may not always receive all the information we process.

**The right to object.** You have the right to object to {{ datacontroller }} processing (using) your personal data. This effectively means that you can stop or prevent us from using your data. However, it only applies in certain circumstances, and we may not need to stop the processing of your personal data if we can give legitimate reasons to continue using your personal

**The right to erasure.** You have the right to ask us to erase your personal information in certain circumstances.

{#p

Question

Logic

data\_portability is present when the legal basis is not consent or performance of a contract. This answer is provided in clause 2 above. If the processing is taking place by automated means (e.g. only in physical registers), please insert this item

p#}

{%p if automated\_decision legal\_requirement “OR” legitimate\_interest %}

**The right to data portability**. You can obtain a copy of your personal data in a structured, commonly used and machine-readable format by contacting us by using the contact details in section 5. If technically feasible, you may request that the personal data is transmitted directly to another company or person acting as a data controller.

{%p endif }

**The right to rectification**. You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.

**The right to restriction of processing.** You have the right to ask us to restrict the processing of your information in certain circumstances.

**The right to complaint.** If you have any complaints about {{ datacontroller }}’s processing of your personal data, you may contact the Danish Data Protection Agency. {{ [You can read more about your rights in the Danish Data Protection Agency’s guidelines on the data subjects’ rights, which is available at [www.datatilsynet.dk](http://www.datatilsynet.dk).] }}

# Contact information {#

{{ [Insert contact details of DPO or other contact point if {{ datacontroller }} does not have a DPO] }}

Question

Insert contact details of DPO or other contact point if {{ datacontroller }} does not have a DPO

Logic

Insert stated contact details

#}

You may contact us by using the below information:

{{ [Insert contact details of DPO or other contact point if {{ datacontroller }} does not have a DPO] }}