

## Personal data policy

A goal for SPH CONSULT is to maintain security for our clients - this also applies to the protection of personal data. With this policy SPH CONSULT aims to provide a clear overall picture of how SPH CONSULT handles your personal data.

### 1. Data Controller

SPH CONSULT runs counselling business in among other countries Denmark. SPH CONSULT is data responsible and hereafter referred to as SPH.

SPH's contact information is:

**SPH Consult, Borrevej 23, Sundsmark, 6400 Sønderborg, Att.: CEO Stefan Poul Hansen.**

**E-mail: [sph@sphconsult.dk](mailto:sph@sphconsult.dk)/Web: [www.sphconsult.dk](http://www.sphconsult.dk)/Telefon: 0045 7468 5210/Mobil: 0045 2145 0117.**

SPH handles all personal data in accordance with existing laws. SPH is in the process of adjusting relevant processes and systems in accordance with the new EU regulations for the processing of personal data (GDPR).

SPH provides a wide range of services. Each service has its own terms and conditions. When, upon booking one or more of these services, you submit your personal information to SPH, you also give SPH consent to process your personal information.

### 2. How does SPH gather personal information?

SPH gathers personal information in the following ways:

- When you choose to purchase and/or request one of SPH's services.
- From persons acting on your behalf.
- On the B2B market. For example, in a sales situation, in which you request a quote for one of SPH's services and/or request a cooperative agreement.
- Via browser cookies and web beacons.
- In the context of using SPH's digital services.
- From social media, advertising and analysis providers and public registers.

At all times the gathering and processing of personal information will be implemented in accordance with the law.

### 3. What information does SPH gather?

The personal information that SPH gathers includes the following:

- Name, address, telephone number, email address, date of birth and other common personal data.
- Feedback on social media and other digital platforms.
- Browser information.
- Information about your company and relevant contact people.

In certain cases, in addition to receiving information from you, SPH will supplement our information with data, which we have received from a third party: for example, a business partner.

In these cases, the third party is required to inform the guests involved about SPH's terms and conditions and existing Personal Data Policy. The third party is also required to obtain the necessary consent for the recording and processing of any sensitive information.

### 4. What is the purpose of gathering personal information?

SPH only gathers personal information that is necessary for the purpose described in the individual terms and conditions for the services in question and in this Personal Data Policy.

It is the individual services that determine the personal information, which SPH gathers, and the reason for gathering it.

SPH's reason for gathering personal information may be one or more of the followings:

- Processing SPH services.
- Contact with you before, during or after the processing.
- Compliance with your request about services.
- Improvement and development of SPH's services.
- Customizing SPH's communication and marketing to suit you.
- Customizing the communication and marketing of business partners to suit you.
- Administration of your relationship with SPH.
- Compliance with legal requirements.

### 5. The legal basis for processing

Below we account for the legal basis for SPH's processing of your personal data.

For example, SPH can process your personal information because it is necessary for the performance of a contract, to which you are party. SPH can also process your personal information in order to take certain actions and/or make preparations at your request prior to entering into a contract. Processing can also take place if it is necessary for the purpose of the legitimate interests pursued by SPH, except where such interests are overridden by your interest.

Legitimate interests pursued by SPH can include statistics, customer surveys, interest-based marketing, and analysis of general customer behaviour: for example, for the purpose of improving your benefits, your experience, and the quality of SPH's services as a whole.

If you inform SPH about special preferences and interests such as health information, disability, religious belief, or the like, SPH will use the information to customize the service in question in accordance with your instructions and your processing with SPH services.

## 6. Your rights

In accordance with the EU General Data Protection Regulation, you have a number of rights.

These rights are as follows:

- You have the right to inspect the personal information about you, which SPH processes.
- You have the right to have the information about you, which SPH has registered, corrected and updated.
- You have the right to have the information about you, which SPH has registered, deleted. If you wish to have your personal information deleted, SPH will delete all the information, which SPH is not legally obliged to store.
- If the processing of personal information is based on your consent, you have the right to withdraw that consent. This means that the processing will then be discontinued, unless SPH is legally obliged to process that personal information.

However, access may be limited to protect other people's private lives, trade secrets and intellectual property rights.

By sending a request by e-mail to [sph@sphconsult.dk](mailto:sph@sphconsult.dk), you can receive a printout of your personal information, have your personal information updated, and take exception or request deletion of your personal information.

The request must be signed by you and contain your name, address, telephone number, email address, a copy of your passport or your driver's license and your SPH customer number.

In the case of requests for amendments to, and/or deletion of your personal information, SPH will check whether the conditions have been complied with before implementing the changes or deletion as quickly as possible

No later than 1 month after receiving your request for a printout, SPH will send the printout to you at your e-mail address.

You can also contact SPH if you think that the processing of your personal data breaches the law or other legal obligations.

SPH can reject requests, which: are unreasonably repetitive; require disproportionate technical action (for example, the development of a new system or substantial changes to an existing practice); affect the protection of other people's personal information; entail situations, in which the desired action may be considered excessively complicated (for example, requests for information that exists only as security copies).

## 7. The secure storage and sharing of your personal data

SPH protects your personal information and has adopted internal rules for information security, which contain instructions and precautionary measures to protect your personal information from unauthorized publication and from unauthorized persons gaining access to, or knowledge of it.

To prevent loss of data, SPH continuously backs up its data set.

In the event of a security breach that results in a high risk of discrimination, ID theft, financial loss, loss of reputation or other significant inconvenience for you, SPH will notify you of the security breach as soon as possible.

SPH security procedures are regularly revised on the basis of the latest technological development.

In addition to SPH's internal systems, SPH uses external providers of IT services, IT systems, payment solutions etc.

SPH has started the process of entering into data processor agreements with all the relevant IT providers in accordance with the new EU regulations for the processing of personal data (GDPR). This ensures a high level of protection for your personal information.

In order to provide the highest level of service, SPH shares selected personal information, for example at your request, with external providers such as restaurants, hotels etc.

In certain cases, SPH may also be obliged to disclose personal information in accordance with legislation or on the basis of a ruling from a public authority.

SPH deletes your personal information, when SPH has no further legal obligation to store the information, or when there is no longer any reason to process it.

## 8. Contact

If you have any questions, comments or complaints about SPH's processing of personal information, please write to:

**SPH Consult, Borrevej 23, Sundsmark, 6400 Sønderborg, Att.: CEO Stefan Poul Hansen.**

**E-mail: [sph@sphconsult.dk](mailto:sph@sphconsult.dk)/Web: [www.sphconsult.dk](http://www.sphconsult.dk)/Telefon: 0045 7468 5210/Mobil: 0045 2145 0117.**

Should this not clarify the matter, you can then register a complaint with the Danish Data Protection Agency.

You can find the current contact address on [www.datatilsynet.dk](http://www.datatilsynet.dk).

Any changes to the Personal Data Policy will be announced with the publication of new terms and conditions on SPH's website.

You can see the date of the last revision of the Policy below.