

Privacy policy

North Media A/S
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Denmark
CVR no.: 66590119

This is version 2, which was last updated on 02/07/2022 at 1:30 p.m.

1. Introduction

- 1.1 This privacy policy (the “**Policy**”) describes how North Media A/S (“**us**”, “**we**” or “**our**”) processes your personal data on our website.
- 1.2 We have drawn up and made the Policy available in order to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (the “**GDPR**”) and the disclosure obligations set out therein.

2. Types of personal data subject to processing

2.1 Website:

When you visit our website, www.northmedia.dk, the browser you use on your device automatically discloses the IP address of the internet-connected device accessing the website:

1. Date and time of access
2. Name and URL of the file being downloaded
3. The website/application used to gain access (referrer URL), the browser you are using and possibly the operating system of your internet-connected computer as well as the name of your internet service provider

If you are a customer/business partner/supplier/provider, we will collect and process the following personally identifiable data about you:

- General contact information about customers/business partners/suppliers/providers and their contact persons and other customer/supplier/provider enquiries. Information on contact persons may come from the employer or yourself. In addition, we register statutory information about business partners and their employees.

If you apply for a job with us, we will collect and process the following personal data: When you apply for a job with North Media, we will process various personal data about you. We will process the personal data contained in your application, CV and other appendixes enclosed with your application. We will also process such personal data as you disclose during a job interview.

You may be asked to complete a personality and proficiency test as part of the recruitment process. The results of the test will form part of our assessment as to whether your profile fits the job in question.

North Media does not wish to process data concerning your civil registration (CPR) number or other particularly sensitive data (data concerning your health, sexual orientation, etc.) for purposes of the recruitment process. We therefore ask that you delete your CPR number and other particularly sensitive data from the documents you wish to send to us.

- 2.2 If we need to collect and process other personal data than those stated above, we will notify you in connection with the collection. Such notification may also be provided by updating this Policy.

3. Purposes of processing personal data

- 3.1 We will only process your personal data if we have a legitimate basis for doing so, in which case we will process your data in accordance with the rules of the GDPR. Depending on the circumstances, we may process your personal data for the following purposes:
 - a) To prevent deceit, fraud or unauthorised use of our products, services or website, including for purposes of legal proceedings.

Website:

Our website server will store the data temporarily in a so-called log file for the following purposes:

1. To ensure the smooth establishment of a connection
2. To analyse the security and stability of the system

Job applicants:

The purpose of the processing is to be able to assess and reply to your application.

4. **Legal basis for processing personal data**

4.1 We will only process your personal data if we have a legitimate basis for doing so under the GDPR. Depending on the circumstances, we will process your personal data on the following legal basis:

- a) The processing is necessary for the performance of a contract with the data subject, see article 6(1)(b), first limb, of the GDPR.

Website:

Our legitimate interest is based on the data processing purposes stated above and the consent you have given us via the cookie consent banner appearing when you start surfing on our website, see article 6(1)(a) of the GDPR.

You control your data. We are required to obtain your consent before we use/set cookies on your tablet/computer/phone. When surfing on our website, you can accept or reject the cookies we request to set on your device. You can reject all types of cookies except for necessary cookies, which are technical cookies that are necessary in order to make our website work on your PC/tablet/mobile phone.

Customer/business partner/supplier/provider:

The legal basis for processing the personal data of customers/suppliers/providers/business partners is provided by article 6(1)(b) of the GDPR, according to which processing is lawful if it is necessary for the performance of a contract to which the data subject is party, in order to take steps at the request of the data subject prior to entering into a contract, or for the purposes of the legitimate interests pursued by North Media, which are to carry on business, see article 6(1)(f) of the GDPR.

Job applicants:

The legal basis for processing your personal data as part of the recruitment process – our legitimate interest – is provided by article 6(1)(f) of the GDPR.

Our legitimate interest is to find the best possible candidate for the job. For that purpose, we will obtain references etc., which we do based on your written consent, as set out in article 6(1)(a) of the GDPR.

4.2 Visitors to our location. CCTV monitoring

North Media performs CCTV monitoring of a number of indoor and outdoor areas at our locations in Søborg. This implies that the personal data of employees, visitors and others frequenting the areas subject to monitoring are recorded (processed). We are permitted to do so under, among other rules, the Danish TV Monitoring Act. The purpose of the CCTV monitoring is to prevent and solve crime.

We do not perform CCTV monitoring of ordinarily trafficked areas. The monitoring is performed by means of cameras that are active 24/7. Proper signage has been put up at reception and at entrances/driveways to our locations and at the indoor areas subject to monitoring. Only a few relevant employees can access the recordings that are relevant to their areas.

Legal basis for CCTV monitoring

The legal basis for the processing is the Danish TV Monitoring Act and article 6(1)(f) of the GDPR. North Media pursues the legitimate interest that the processing of personal data is necessary for purposes of preventing and solving crime and for the establishment, exercise or defence of legal claims.

5. **Disclosure and transfer of personal data**

5.1 We will only disclose personal data to third parties to the extent permitted or required by law, including when it is relevant and at your and/or the data controller's specific request.

5.2 Data processors

In order to be able to provide the best possible service to you, we use the following data processors:

- Hosting services provider
- IT systems for the operation of North Media A/S (recruitment system, e-mail distribution)
- G4S (CCTV monitoring)

5.3 Generally, we use a number of external and professional organisations as suppliers, providers and business partners. They provide or assist us in providing our services and products. Such external organisations will not receive or process personal data, unless the transfer and processing thereof is permitted by law. If the external organisations or business partners act as data processors for us, they will always process personal data under a data processing agreement complying with statutory requirements for such agreements. If the external organisations or business partners are independent data controllers, they will process personal data in accordance with their own privacy or data protection policies, to which the external organisations will draw attention, unless otherwise prescribed by law.

5.4 We will not transfer personal data to countries or international organisations outside the EU/EEA, unless this is necessary to meet your specific request.

6. **Erasure and storage of personal data**

6.1 Website visitors:

Data concerning your movements on our website will be deleted when they are no longer relevant in relation to the purpose for which they were collected and generally within 24 months after being collected.

Customers/business partners/suppliers/providers and contact persons:

Data concerning customers and their contact persons will be deleted within two years after termination of the customer relationship, unless there is a legitimate reason for a longer storage period, including a pending dispute. However, data of relevance to the bookkeeping will be stored for five years plus the current financial year.

7. **Your rights**

7.1 As a data subject, you have a number of rights:

7.1.1 You have the right to request access to the personal data we process about you and to information about the purpose of the processing and whether we disclose your personal data to third parties.

- 7.1.2 You have the right to have any incorrect personal data about you rectified.
- 7.1.3 Under certain circumstances, you have the right to have part of your personal data erased.
- 7.1.4 Under certain circumstances, you have the right to request restriction of the processing of your personal data to the effect that we will only store your personal data for a given period.
- 7.1.5 Under certain circumstances, you have the right to object to our processing of your personal data on grounds relating to your particular situation.
- 7.1.6 You have the right not to be subject to a decision based solely on automated processing, unless the decision is necessary for your employment with us, is authorised by law or is based on your explicit consent.
- 7.1.7 If we have obtained your consent for part of our processing of your personal data, you have the right to withdraw your consent at any time. If you choose to withdraw your consent, it will not affect the lawfulness of any processing based on the consent prior to its withdrawal.

7.2 Under certain circumstances, you have the right to data portability of the personal data you have provided to us.

7.3 You can always lodge a complaint with the Danish Data Protection Agency.

7.4 These rights may be subject to conditions or restrictions. Accordingly, you may not have the right to data portability in a given case – it depends on the specific circumstances of the processing activities.

8. **Amendments to this Policy**

8.1 We reserve the right to update and amend this Policy. If we amend the Policy, we will change the date and the version number at the top of the document. In the event of material amendments, we will announce this in the form of a visible notification on our website, by e-mail or using other means of communication.

9. **Contact information**

9.1 Please feel free to contact us at the below e-mail address if you:

- disagree in our processing or believe that our processing of your personal data violates the law
- have any questions or comments regarding this Policy or
- wish to exercise one or more of your rights as a data subject. For questions or comments regarding this Policy or in case you wish to exercise one or more rights, please contact us at info@northmedia.dk.

9.1.1 We will endeavour to comply with your requests regarding our processing of your personal data. If you nevertheless wish to lodge a complaint, you can do so by contacting the Danish Data Protection Agency. You can read more about your rights in the Danish Data Protection Agency's guidance on the rights of data subjects, which is available at www.datatilsynet.dk.
