## 2.1

#### 1. Introduction

This policy describes how we apply and protect personal data and ensure that employees are aware of the rules governing the use of the personal data that they have access to as part of their work. This policy complements our other policies on IT security, internet and e-mail, etc.

This policy is intended to meet the requirements of the EU Personal Data Regulation, including especially Art.13.

Where the policy refers to articles of law, this refers to the EU Personal Data Regulation, and in the case of paragraph references, this refers to Danish law for Personal Data.

## 2. General about the processing of personal data

Any processing of personal data in our company is done by reference to the principles of legality, reasonableness and transparency. Personal data is collected solely for explicitly stated and legitimate purposes, as well as observing the principle of data collection. We aim to ensure that all information is correct and up to date, as well as the principles of storage constraints, integrity and confidentiality and, in particular, accountability.

If you have questions about our processing of personal data and this privacy policy, you are always welcome to contact xxxxxx xxxxxxx, who has the overall responsibility for this.

## 3. Responsible for data

BOLIGLAAN DENMARK is data controller and have the responsibility that your data is processed accordance with current law.

#### Contact information BOLIGLAAN DENMARK

Name; Jens-Chr. Hagman Address: Lille Strandvænget 4 Zip code: 2680 Solrød Strand CVR. Number: 30488601

tel: +45 5123 2303

e-mail: <a href="mailto:info@boliglaandanmark.dk">info@boliglaandanmark.dk</a> Website: www.boliglaandanamrks.dk

# 4. Treatment Purposes; Categories of information being processed

The purpose of processing personal data may be varied, but the following examples are the most common. If we exceptionally treat personal data for purposes that are incompatible with the below, you will be informed about this. Similar, if we collect or process personal data from anyone other than you.

- Execution of orders.
- Compliance with warranty claims.
- Communication in connection with your order or other inquiries to us.
- Ensure ease of use and security.
- Optimization of our digital solutions.
- Opportunity to participate in customer surveys, competitions, drawings, etc. via digital solutions.
- Archive of Registered Products and Related Personal Information.
- Legal requirements (exercise of authority)

#### 4.1 What data is collected

We are using data about you to fulfill our agreement with you as well as to make our service better and secure quality in our products and services. The personal data we process includes Tax Information, Annual Accounts, Payrolls, Image ID.

## 4.1.1 Automatically collected data

We are using a number of digital solutions based on different technologies for the purpose of ensuring user-friendliness and security. These technologies can automatically collect data to provide the best possible solution, either directly by us or by a third party on behalf of us. Analysis of clickstream data and cookies are examples of this.

All visits to a digital solution result in the sending of information from the browser you are using to a server. It is through analysis of these data that we optimize the digital solutions. Data is collected through third parties on behalf of us. Data about your browser can be collected to manage our system and conduct internal, marketing-related analyzes based on your behavior. Examples of data that are collected and analyzed:

- · Date and time of visit
- Pages visited in the solution
- The IP address you use
- Geographical location of the IP address
- Information about the browser and computer used (type, version, operating system, etc.)
- URL from referral location (the page from which the visitor came to our solution)

We use internal data providers that act as data administrators for us. We are data administrators for the data collected and the data collected will not be passed on unless there is a consent or it is a legal requirement.

You can read more about our use of cookies below in the section 4.

## 4.1.2 Information you provide

We will of course note the information you provide us in connection with a physical visit or visit our website.

Examples of data that you actively submit are usually common and include name, address, phone number, e-mail address, etc. and most often come from:

- · Information you share with us via social media
- Information sent by e-mail
- Information we receive from you in connection with the execution of orders
- Information you share with us when you participate in surveys, events and competitions

The list is not comprehensive.

#### 5. Basis for the use of data

Personal data are processed mainly based on Art. 6.1. b. Processing is necessary for the fulfillment of contractual legal obligations between us.

Certain information, including sensitive, is treated as far as possible on the basis of consent, see immediately below.

### 6. Recipients and disclosure of personal data

We disclose exclusively personal data to third parties in accordance with what is stated in this Privacy Policy.

We may disclose your information if we are required to disclose or share these in order to comply with a legal obligation. Forwarding may also take place at the discretion of a court or other authority, or to protect trademarks, rights or property. This involves the exchange of information with other companies and organizations for protection against fraud.

We use service providers and data administrators who perform work on our behalf. The services may include server hosting and system maintenance, analysis, payment solutions, address and solvency check, email service, etc. These collaborators can access data to the extent necessary to provide their services and services. The partners will be contractually bound to treat all data strictly confidentially and thus do not have permission to use data for anything other than what is covered by the contractual obligation to us. We verify that our data processing partners comply with their obligations. If we disclose your information to a service provider or data provider outside the EU, we ensure that we comply with the regulatory requirements for such transfers.

We never collect personal data without giving you this information by registration, purchase or participation in a survey, etc.

## 7. Storage time and delete policy

We store information about you as long as we have a legitimate and reasonable basis for this, including so we have the opportunity to serve you as best as possible.

As a starting point, all personal data will be deleted after 5 years after completion of the customer relationship, meaning the last active transaction. Personal data can be stored longer if there is a real need for this, for example if a legal claim is to be determined, enforced or defended, see Art. 17. 3. e.

Cookies, see Section 4, however, is deleted no later than 12 months after use.

## 8. Right of access, rectification and deletion (Article 13.2.b, Art. 15)

You have the right to request insight in relation to the information we process. The information you can request is as appropriate:

- · Processing of personal data
- What is being treated
- The purpose of the treatment
- The affected categories of personal data (common or sensitive)
- The period in which they are processed, including stored
- The right to Request rectification or deletion
- The right to file a complaint with the Data Authority

You are entitled to receive incorrect information about yourself corrected without unnecessary delay. You must take the initiative yourself for such a correction.

You may also request to be deleted ("the right to be forgotten"), however, only after the expiry of our statutory storage obligation pursuant to the Posting Act. You can also contact us if you believe your personal data is being processed in violation of the law or other legal obligations.

When you address a request to correct or delete your personal data, we will investigate whether the conditions are respected and make changes or deletions as soon as possible.

#### 9. Data portability and profiling

You are entitled to receive the personal data you have made available to us and those we have obtained from you with other actors based on your consent. If we process data about you as part of a contract where you are a party, you can also send your data. You also have the right to transfer these personal data to another service provider.

If you wish to use your right to data portability, you will receive your personal data from us in a commonly used format.

We generally do not make profiles, which means automated decisions for analysis or the like.

#### 10. Consent

Where consent is needed as a basis for processing data, we must be able to document that such a document exists. Therefore, we always require a written consent.

A consent is a voluntary, specific, informed and unambiguous testimony about a processing of personal data. You may withdraw your consent at any time, and if it is the sole treatment basis, future treatment will cease. However, our storage obligation and duty are not changed.

The consent can be withdrawn by contacting us at the contact details listed.

#### 11. COOKIES

#### 11.1 What are cookies?

Cookies are small text files that contain letters and numbers that are put on your computer or other device. Cookies are set when you visit a website that uses cookies and they can be used to keep track of which pages you have visited, they can help you to continue where you sleep or they can remember your language settings or other preferences. There are no personal information stored in our cookies and they can not contain viruses.

If we place cookies, you will be informed about the use and purpose of collecting data via cookies. At the same time, you will be asked to give your consent. However, necessary cookies to ensure functionality and settings can be used without your consent.

#### 11.2 Cookies and their purpose

The purpose of cookies is to conduct traffic measurement and facilitate your user experience of the web page. The website uses cookies from Google Analytics to measure traffic on the site.

You can opt out of Google Analytics cookies here: http://tools.google.com/dlpage/gaoptout

#### 11.3 Delete or disable cookies in the browser

You can always reject cookies on your computer by changing the settings in your browser. Where to find the settings depends on which browser you are using. However, you should be aware that if you do, there are many features and services on the internet that you can not use.

All browsers allow you to delete your cookies together or individually. How you do it depends on which browser you're using. Remember to use more browsers, delete cookies in all of them.

Read more about deletion and handling here: <a href="http://minecookies.org/cookiehandtering">http://minecookies.org/cookiehandtering</a>

## 12. Security

We protect your personal data and have a set of internal rules on information and IT security.

Our internal security rules contain instructions and actions that protect your personal data against being destroyed, lost or modified, from unauthorized disclosure, and against unauthorized access or knowledge of them.

We have established procedures for granting access rights to those of our employees who handle personal data, including sensitive. We control their actual access through logging, codes and supervision. To avoid data loss, we are continuously backing up our data sets.

In case of a security breach that results in a high risk of discrimination, ID theft, financial loss, loss of reputation or other significant inconvenience, we will notify you of the security breach as soon as possible, as well as having a statutory notification requirement.

## 13. Complaint (Article 77)

Any registrant has the right to file a complaint with the Data Inspectorate regarding our processing of personal data.

In case of complaints, please contact: The Danish Data Protection Agency Borgergade 28, 5.
1300 Copenhagen K
e-mail: dt@datatilsynet.dk

tel: +45 3319 3200