

Information about Danica Pension's processing of personal data

Danica Pension is a financial institution that offers pensions and insurance to its customers.

Effective from 31 July 2019

When you become a Danica Pension customer, or if you change your pension scheme with us, we ask you to provide certain personal data. We register and use these data about you to offer you the best advice and solutions, fulfil agreements with you and comply with the legal requirements that apply to us.

Danica Pension is the data controller in respect of the processing of personal data we received about you. We protect your personal data by taking all relevant measures in accordance with the legislation.

This document sets out the basis for how Danica Pension looks after your personal data and the rights you can exercise in relation to the data we hold about you.

WHEN DO WE REGISTER AND USE YOUR PERSONAL DATA?

We register and use data about you for several reasons. We do so to offer you the best advice and solutions and to fulfil our agreements with you. We also do so to comply with the legal requirements that apply to us as a financial institution.

This means that we register and use personal data when:

- You have made, or are considering making, an agreement with us, see art. 6.1(b) of the General Data Protection Regulation (GDPR)
- You have given us consent to use your personal data for a specific purpose, see art. 6.1(a) of GDPR
- It is our legal duty, for example, in accordance with
 - The Danish Tax Control Act (Skattekontrolloven)
 - The Danish Bookkeeping Act (Bogføringsloven)
 - The Danish Financial Business Act (Lov om finansiel virksomhed)
 - The Danish Data Protection Act (Databeskyttelsesloven)
 - The Danish Insurance Contracts Act (Forsikringsaftaleloven)
 - The Danish Anti-Money Laundering Act (Hvidvaskloven)
 - The Danish CPR Act (CPR-loven)
- It is necessary in order to pursue a legitimate interest of Danica Pension, see art. 6.1(f) of GDPR. For example, this may be to prevent abuse and loss, to strengthen IT security and/or for direct marketing purposes. We will only register and use your personal data if our interest clearly outweighs your interest in us not doing so.

WHAT PERSONAL DATA DO WE REGISTER AND USE?

Depending on the products or services you are interested in or have ordered, we register and use different kinds of personal data, including:

- basic personal data, for example your name, contact information and national identification number
- Information about your profession, work or education
- information about your employer, if your scheme is an employer pension scheme
- Financial information, for example your annual salary
- Information about your family and household
- ID documentation, for example photo copies of your passport, driver's license and health insurance card
- Details about the products and services we provide to you, including how you use them and your preferences towards them
- Health information

We may also register other personal data if needed to provide you with specific products or services or if we are required by law to do so.

Our ability to offer you the best advice and solutions very much depends on how well we know you. Consequently, it is important that the personal data you provide are correct and that you keep us informed of any changes. You can see the contact information we have registered on you in Netpension.

Sensitive personal data

We may need to register and use sensitive personal data, for example health information, in order to advise you or offer you a product or service. We will seek your explicit consent, see art. 9.2(a) of GDPR, to register and use sensitive personal data, unless we are permitted to process sensitive personal data without your consent by law, for example when exercising our legal claims, see art. 9.2(f) of GDPR.

Intra-group exchange of personal data

Danica Pension comprises Forsikringsselskabet Danica, Skadeforsikringsaktieselskab af 1999 [CVR no. 25020634] and Danica Pension Livsforsikringsaktieselskab [CVR no. 24256146].

In order to manage your pension schemes and insurance covers and give you the best advice possible, we need to exchange your personal data between companies in the Danica Group.

Such exchange covers personal data about:

- You, for example your name, address, national identification number and state of health
- The products and services provided to you by Danica Pension and related personal data, for example details about types of insurance covers, the amount of benefits, custody accounts and contributions.

WHY AND HOW DO WE REGISTER AND USE YOUR PERSONAL DATA?

We register and use personal data for the provision of our products, i.e. pension schemes and insurance covers.

We also register and use personal data for other activities related to:

- Customer care, advice and administration
- Sending you relevant marketing material, unless you have deselected this
- Developing and managing our products, services and business, including to test our systems

- Setting prices and fees
- Identifying and verifying our customers
- Risk management
- Protecting you and Danica Pension against fraud
- Complying with legal requirements.

HOW DO WE COLLECT PERSONAL DATA?

We collect most of your data directly from you or by observing your actions, for example when:

- You fill out applications and other forms for ordering products and services
- You submit specific documents to us
- You talk to us on the phone. When you call us or when we call you at your request or to follow up on your inquiry, conversations may be recorded and stored due to documentation and security purposes. Before and employee answers the call or before you enter the queue, you will be notified if the call will be recorded. In few situations, e.g. in case of long waiting time, your call can though be redirected to a non-recorded employee without notifying you. If we talk with you about investment services, we are obliged to record and store our conversation.
- You use our website, mobile applications, products and services
- You participate in customer surveys or promotions organised by us
- You communicate with us via electronic media, including for instance e-mails

If your pension scheme or insurance covers are set up via your employer, we get information about your salary from your employer.

HOW LONG DO WE HOLD YOUR PERSONAL DATA?

We keep your personal data only for as long as it is needed for the purpose for which your data were registered and used. For example, we keep personal data to be able to assess whether you have a claim against us.

This means that we keep your personal data as long as we are providing a service or a product to you. When your business connection with us has terminated, we normally keep your personal data for a further ten years. We do so primarily to meet our obligations in accordance with the Danish Statute of Limitations Act, under which the mandatory time limit for raising claims is ten years.

We also do so to meet our obligations in accordance with the Danish Bookkeeping Act, the Danish Anti-Money Laundering Act and requirements imposed by the Danish Financial Supervisory Authority.

THIRD PARTIES AND YOUR PERSONAL DATA

Personal data from third parties

We register and use data about you from third parties, for instance:

- The Danish Central Office of Civil Registration and other publicly accessible sources and registers. We register and use such personal data, for example to check the accuracy of the data we have.
- Danske Bank Group entities, for example Realkredit Danmark (if we have your consent).
- Healthcare professionals, for example doctors, hospitals and clinics (if we have your consent).

- Other insurance companies (if we have your consent).
- Municipalities and public authorities (if we have your consent).
- The Danish Centre of Health and Insurance (helbredogforsikring.dk).
- Entities of Danske Bank Group. We register and use personal data from their notifications to the State Prosecutor for Serious Economic and International Crime in accordance with anti-money-laundering legislation.

Third parties that we share your personal data with

In some instances, we may share personal data with third parties inside or outside the Danica Pension Group:

- If you have asked us to transfer an amount to other pension companies, we disclose data about you that are necessary to identify you and fulfil the agreement.
- Healthcare professionals, for example medical specialists (if you have given your consent).
- The Danish Centre of Health and Insurance (helbredogforsikring.dk).
- We disclose data about you to public authorities as required by law or according to court orders, on request of the police, the bailiff or other authorities, including to the State Prosecutor for Serious Economic and International Crime (SØIK) in accordance with the Danish Anti-Money-Laundering Act and to the Danish Tax Authorities in accordance with the Danish Tax Control Act.
- In connection with IT development, hosting and support, we transfer personal data to data processors, including data processors in third countries outside the EU and the EEA, for example Danske Bank India. We ensure that your rights are safeguarded and that the level of protection is maintained in connection with such data transfers by using, for example, standard contracts approved by the European Commission or the Danish Data Protection Agency. You can obtain a copy of these standard contracts by contacting us.

PROFILING AND AUTOMATED DECISIONS

Profiling

Profiling is a form of automated processing of your personal data that helps us better understand you and your needs. For example, we use profiling and data modelling to offer you specific products and services that meet your preferences. We also use it to determine prices of products and services, to detect fraud and fraud risk and for marketing purposes.

Automated decision-making

With automated decision-making, we use our systems to make decisions based on the personal data we have about you. For example, we use automated decision-making to set up your pension scheme and to authorise treatments. Automated decision-making helps us make sure that our decisions are quick, fair, efficient and correct, based on the personal data we have.

If the automated decision leads to an unfavourable result for you, the decision will be handled manually.

YOUR RIGHTS

Insight into your personal data

You can obtain information and access to the personal data we have registered and use, where they come from and what we use them for. You can obtain information about for how long we hold your personal data and about who receives data about you, to the extent that we disclose data in Denmark and abroad. Your right of access may, however, be restricted by legislation, to protect other persons' privacy or for

purposes of our business and practices. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of insight.

Manual processing

You can obtain information about an automated decision was made and the effects of the decision, and you are entitled to manual processing of any automated assessment.

Right to object

In certain circumstances, you have the right to object to our use of your personal data. This is the case, for example when our use of your personal data is based on our legitimate interest.

Objection to direct marketing

We wish to provide you with the best possible advice and to contact you with relevant information and clear recommendations. For these purposes, we use your personal data to assess when it is relevant to contact you and ensure that you get the best advice and information, whether we contact you by e-mail, by letter or by text message.

You can deselect such contact information either in Netpension or by calling us. Please note that if you do so, we will not be able to contact you with relevant advice, recommendations and information on existing and new pension, savings and insurance products.

Correction or erasure of personal data

If your personal data are incorrect, incomplete or irrelevant, you are entitled to have the data corrected or erased with the restrictions that follow from existing legislation and rights to process personal data. These rights are known as the "right to rectification", "right to erasure" or "right to be forgotten".

Restriction of use

If you believe that the data we have registered about you is incorrect, or if you have objected to the use of the data, you may demand that we restrict the use to storage. Use will only be restricted to storage until the correctness of the personal data can be established, or it can be checked whether our legitimate interests outweigh your interests.

If you are entitled to have the data we have registered about you erased, but do not wish the data to be erased, you may instead request us to restrict the use of these data to storage. If we need to use the data we have registered about you solely to assert a legal claim, you may also demand that other use of these data be restricted to storage. We may, however, be entitled to other use of the data, including to assert a legal claim or if you have given your consent to this.

Withdrawal of consent

You can withdraw your consent at any given time. Please note that if you withdraw your consent, we may not be able to offer you specific services or products or process a request for benefits. Note also that we will continue to use your personal data, for example to fulfil an agreement we have made with you, or if we are entitled to do so by law.

If you choose to withdraw your consent, this will only apply from the date of your withdrawal. Accordingly, up to the date of withdrawal, the registration and use of your personal data will be based on the consent previously given.

Updates

We update this privacy notice on a regular basis. In case of change, the “effective from” date at the top of this document will be amended. Any changes to this privacy notice will apply to you and your data immediately. If changes affect how your personal data is processed, we will take reasonable steps to let you know of the changes.

Data portability

If we use personal data based on your consent or as a result of an agreement, and the data processing is automated, you have a right to receive the copy of the data you have provided in an electronic machine-readable format.

CONTACT DETAILS AND HOW CAN YOU COMPLAIN

You are welcome to contact us at any time if you have questions about your rights and how we register and use personal data.

Danica Pension
Parallelvej 17
DK-2800 Kgs. Lyngby
Denmark

Tel. +45 70 11 25 25
www.danicapension.dk/write - choose the topic ‘Other’ (secure connection).

Data Protection Officer

If you have any questions for our Data Protection Officer, please contact us via www.danicapension.dk/write - choose the topic ‘Other’ (secure connection).

Complaints handling unit

If you are dissatisfied with how we register and use your personal data, and your dialogue with the Data Protection Officer has not led to a satisfactory outcome, you can contact our complaints handling unit via www.danicapension.dk/write or by writing to Danica Pension, Parallelvej 17, DK-2800 Kgs. Lyngby, Denmark.

You can also lodge a complaint with the Danish Data Protection Agency:

Datatilsynet
Borgergade 28, 5.
DK- 1300 Copenhagen K
Denmark
E-mail: dt@datatilsynet.dk
