

### **1. Preamble**

B&V SpetsCom, hereinafter referred to as the Company, is a one-person business specialised in language solutions and consultancy services. The Company is dedicated to protect your your privacy and personal data, as defined by the data protection legislation, as carefully as possible. In the event that the Company collects, stores, uses and optionally forwards personal information, the Company acts, as appropriate, either as data processor or data processor and in this capacity a number of legislative og ethical obligations are imposed on the Company which it will do its utmost to comply with. According to the data protection legislation you are entitled to exercise certain rights with respect to information about you that the Company collects and stores. These rights are detailed in the following.

### **2. Which personal data does the Company collect?**

The Company only collects the personal data strictly needed to be able to interact with its current and potential customers, suppliers and cooperation partners. This data is entirely of basic nature: company names, names of contact persons, email addresses and phone number, Skype addresses etc. Such so-called personally identifying information (PII) may all be obtained from open sources, but as they are personal data according to the data protection legislation, they are included here. The Company does not collect - and does not intend to collect - special categories of personal data (the so-called sensitive personal information (SPI), as referred to in Article 9 in GDPR, details of criminal offences, as referred to in Article 10 in the GDPR and § 8 in the Danish Data Protection Act (databeskyttelsesloven) or confidential information pursuant to the Danish Criminal Code § 152 in conjunction with § 27 of the Danish Public Administration Act. Should the Company - in connection with its delivery of its services - need to collect, store, use and disclose such sensitive or confidential personal data, this will only take place on the basis of the explicit consent of the data subject combined with a review of the legality of such actions.

### **3. How does the Company collect personal information?**

The Company's collection of personal data mainly takes place through the common interaction with customers, business partners, suppliers and other players who are part of the Company's activities. The website of the Company does not - apart from the information voluntarily provided by potential customers/suppliers through the Company's contact form - allow any collection of personal data on behalf of the Company.

Apart from operational cookies strictly necessary for the operation of the services that are set by the website operator in order to make it possible for visitors/users to access in an appropriate way, only cookies for anonymous registration of the activity on the Company's website are used. Accordingly, you will not be met with any consent form when you visit the Company's website for the first time. No marketing cookies are set on the Company's website - and it is the firm position of the Company that marketing cookies referring to third party products and/or services should be banned.

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### **Data processing agreement with Jysk Online Medie**

The Company has in its capacity as data controller entered into a data processing agreement with Jysk Online Medie (the Data processor). This agreement regulates the reciprocal and external obligations of the parties related to the data protection legislation. The Data processor outlines that "The processing (of data) involves transfer of personal data to third countries both inside and outside the EU".

### **3.1. The Company's role in its capacity as sub-processor**

The Company often acts as subcontractor engaged by translation and copywriting agencies (data processors) commissioned to solve assignments for the primary customer (den data controller). In the event that such tasks are solved by the Company, it acts as sub-processor. For this purpose the Company has signed sub-processing agreements with some of the above mentioned agencies, while other relations are still unresolved at the contractual level. In any case, the Company acknowledges its responsibility as sub-processor and is aware of the fact that the Company as sub-processor is subject of the same obligations in the field of data protection as the data processor.

### **3.2. Google Analytics**

In order to measure the visit frequency on the Company's website, the analytical tool Google Analytics is used. The information collected through this tool is anonymised and constitutes no problem with respect to the data protection legislation.

## **4. Purpose and scope of personal data processing:**

### **4.1. The personal data is used for the following purposes:**

- To deliver the Company's services
- For processing of orders and quotation
- To ensure the communication with customers, business partners, suppliers, public authorities and other stake holders
- To comply with regulatory requirements and administrative provisions

### **4.2. The legal basis of the processing and use (legality)**

- The valid consent of the data subject
- The use is necessary to perform an agreement/contract or to take the necessary measures at the request of the data subject before entering into an agreement or contract
- The processing is necessary to comply with a legal obligation imposed on the Company

## **5. Transfer of personal data to third parties**

The Company does not sell, exchange nor transfer personal data to third parties unless the data subject has given his/her explicit consent. Transfer may, however, take place in the following cases: i) in connection with Jysk Online Medie's activities as operator of the website ii) in case the transfer is necessary to comply with applicable law iii) as part of the protection of The Company's or other rights, property or security.

## 6. Retention period

The information about customers, business partners, suppliers etc. collected by the Company will be retained as long as they are necessary and active. After this period the personal data will be deleted as soon as possible under applicable law which is typically after 5 years.

## 7. Rights of the data subject

The data subject has according to Chapter III of the Data Protection Regulation, including primarily the articles 12-22, a number of rights which can be exercised, of which the most important are:

- The right to receive information about the processing of one's personal data (the right to be informed)
- The right to access one's personal data
- The right to have inaccurate personal data rectified, or completed if it is incomplete (right to rectification)
- The right to have one's personal data deleted (the right to be forgotten)
- The right to object to the processing of one's personal data for marketing purposes.
- The right to object to automatic individual decisions, including profiling
- The right for data subjects to obtain and reuse personal data for their own purposes across different services (data portability)

There are a number of limitations concerning these rights as set forth in Chapter 6 of the Danish Data Protection Act (databeskyttelsesloven).

Data subjects wanting to exercise these right may contact the Company by phone or or by e-mail. Complaints about the Company's processing of personal data can be directed to the Danish Data Protection Agency - Datatilsynet, which is the relevant supervisory body:

Datatilsynet  
Borgergade 28, 5.  
1300 Copenhagen K  
Tel.: +45 33 19 32 00  
[dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

## 8. The Company's storage of personal data

The Company will do its utmost to store the personal data as securely as possible.

The Company possesses no expertise within IT security, but has taken the following measures:

- Antivirus programmes have been installed on all the computers of the Company processing personal data.
- All the computers are equipped with access codes only known by the business owner.
- All computers are regularly updated.
- The Company uses Dropbox for storage of files and consequently for storage of personal data. This is a cloud-based solution, and the Company only stores ordinary personal data in this system.

Sensitive personal data - should there under certain circumstances arise a need for it - will be stored on an internal USB memory stick, which will be kept under lock and key.

#### **9. Disclaimer**

The Company has - considering its capacity - taken all possible measures. Any unintended and adverse events leading to economic damage, loss of data or other losses to customers, business partners, suppliers or third parties which are not attributable to intentional nor grossly negligent behaviour by the Company can in no way give rise to the Company's liability for damages.