

General information about our processing of your personal data

When advising our clients, we may have to process personal data about you in connection with legal matters in which you are involved or in connection with your visits to our website. The "processing of data" means, among other things, that we collect personal data about you, store the data and use the data to contact you; we have explained it in more detail below.

Advokatfirma Holck-Andersen & Tyge Sørensen A/S, Nyhavn 6, 1051 Copenhagen K, CVR no. 20015500 is the data controller and is responsible for processing the personal data. See our contact details below. If personal data is handled by Attorney-at-law Niels Gade, Attorney-at-law Niels Gade, CVR-no. 53495451 is data controller and responsible for processing the personal data.

Which data do we process and how do we obtain them?

Our processing of your personal data may involve data of both a general and sensitive nature. General personal data may be, for example, your name, address, telephone number, e-mail as well as work-related, social, financial, and business-related details. If required, we may also have to process details such as your civil registration number (CPR no.).

Sensitive data are information concerning health, trade union membership, racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning sexual relationships or sexual orientation, as well as genetic and biometric data. Most probably, the data we will process will be data concerning health and trade union membership, but it is possible that we may also process some of the other categories of sensitive data.

We may also process data about criminal convictions and offences.

However, in the case of all data, we will only process those data which are relevant to the cases we handle. When we contact you and thereby process your name or e-mail address, this does not necessarily mean that we process any sensitive data about you.

The data we receive come from different sources. We may, for example, contact the company or public authority in which you are employed and you respond to our inquiry on behalf of the company, thereby giving us data such as your name and contact information.

We also receive data from clients who have asked us to handle a case including information such as your name, address as well as information about the specific case. We may also receive other data known to our clients and which are relevant for our handling of a case.

We may also receive data from others who in other ways are familiar with a case, including lawyers or others representing you. Similarly, we may receive data from persons who are to give evidence in legal proceedings, or who are otherwise involved.

We will collect personal data about you from publicly available information, including databases and social media on the Internet.

You may also give us personal data, e.g. in writing, by telephone or during court sessions. These data will be registered and used in the case.

What do we use the data for and what are the rules?

Handling of cases

We process personal data in connection with cases for the purpose of handling our clients' cases and thereby safeguarding their interests. This means that we do not process the data if the data have no relevance to a case.

We will not use your personal data in connection with automatic individual decision-making, including profiling.

When handling a case, it might be necessary to transfer personal data to, among others:

- Other parties to the case and their lawyers
- Our clients
- Your own, our clients' or other parties' bank
- Your own, our clients' or other parties' auditor
- Your own, our clients' or other parties' estate agent
- Courts of law, arbitration tribunals or complaints boards
- Your present or previous municipality of residence
- Your own, our clients' or other parties' employer
- Your own, our clients' or other parties' pension company
- Lawyers or others who may appear on our behalf in the civil court, enforcement court or probate court
- Your own, our clients' or other parties' landlord, SKAT (tax authorities) or others who require this information
- Your own, our clients' or other parties' insurance company, e.g. if we have to make a claim with your legal expenses insurance

- Auction houses handling the forced sale of any appropriated asset
- Credit rating agencies
- The Police

- Our IT suppliers, since they process the data we use when handling our cases by storing the data on their servers. Our IT suppliers' data processing is subject to a data processing agreement. You may, at any time, request information about our suppliers and data processing agreements. Our IT suppliers may use sub data processors.

- In order to conduct our customer due diligence procedure as part of our compliance with the Danish Act on Anti Money Laundering, we use the platform NewBanking Identity for storing and screening some of your personal data. Data is stored encrypted and cannot be accessed by us or anyone else, unless you specifically have given access to the data. You can manage the content and the information you share when using NewBanking, by logging in to www.newbanking.com. You may also download information attached to your NewBanking account on www.newbanking.com. In the following link you can find more information on [NewBankings' privacy policy](#)

Our processing of your personal data is based on the rule on the balancing of interests set out in the General Data Protection Regulation (GDPR) article 6(1), paragraph f. The legitimate interest which justifies our processing of data is our clients' interests in having their case handled. We are not required to obtain your consent to process your personal data for this purpose.

Furthermore we may process data about our clients in order to fulfil our agreement with our clients on safeguarding their interests, in which case the basis for our data processing is GDPR article 6(1), paragraph b. We may also process personal data as part of our customer due diligence procedure, which we are required to follow in certain cases according to the Danish Act on Anti Money Laundering. In this case the processing of personal data is based on article 6 (1) paragraph c as the processing is necessary for compliance with our legal obligation.

Our processing of data relating to criminal convictions and offences is subject to the Danish Data Protection Act, section 8(3); we only process data about criminal convictions and offences for the purpose of safeguarding legitimate interests that clearly outweigh any consideration for the person whose data are being processed.

Our processing of sensitive data about you in connection with handling a case is based on the premise that the processing is necessary for establishing, relying on or defending legal claims,

as set out in GDPR, article 9(2), paragraph f. It is also possible that the sensitive data have been manifestly made public by you, in which case our processing will be based on GDPR article 9(2) paragraph e.

Cookies

When you visit www.adv-nyhavn.dk we will process data about you in the form of cookies. Cookies are small text files stored by our website on your computer, mobile phone, tablet, etc. when you visit us. The purpose of processing the personal data in this case is to improve the efficiency of our website. Further information about cookies is available at <http://www.adv-nyhavn.dk/wp-content/uploads/2018/11/Cookiepolitik.pdf>.

How long do we store your personal data?

At present, there is no fixed storage period for your personal data, but as a general rule we store personal data for 5 years after a case has been closed. When determining the storage period for your personal data, we take into account the outcome of the case, any disputes about the claim or case handling, and how long we risk being confronted with any claims arising from the handling of the case.

In some cases we will store the data for longer periods. In cases in which the direct consequences of our legal assistance to our clients cannot be seen until several years after we have provided advice, prepared the requested documents or conducted the case, we will store the relevant personal data relating to the case until we no longer risk being confronted with any claims arising from the handling of the case.

Your rights and how to file complaints

According to the GDPR, you are entitled to certain rights in relation to our processing of your personal data. If you wish to make use of your rights, please contact us, preferably by e-mail to: advokat@adv-nyhavn.dk, or by conventional mail to our office. You may also contact us at tel. (45) 3311 9313, but we recommend that you write to us in order to avoid any misunderstandings.

Right to obtain a copy of your personal data (right of access)

You may have the right to obtain confirmation as to whether we are processing your personal data. You may also have right of access to the personal data that we process about you as well as certain other data.

Right to rectification

You have the right to obtain the rectification of inaccurate personal data about you. Taking into account the purpose of the processing, you have the right to have incomplete personal data completed, including by means of providing us with a supplementary statement to be added to your personal data.

Right to erasure

You have the right to obtain the erasure of your personal data before our usual date of erasure in cases where the personal data are no longer required for the purposes for which they were collected. You also have the right to obtain the erasure of your personal data if you have objected to the processing of your data because you are in a particular situation that justifies a different course of action on our behalf, and if there are no significant legitimate grounds for continuation of the processing. You also have the right to erasure if it transpires that we are under obligation to erase the data according to national or EU law.

Right to restriction of processing

In certain cases you have the right to obtain restriction of processing of your personal data. If you have obtained the right to restriction of processing, we may from this time on only process the data - with the exception of retention - with your consent, or for the establishment, exercise or defence of legal claims, or in order to protect the rights of another person or important public interests.

Right to object

In certain cases you have the right to object to our processing of your personal data, even though this processing is legal. You may be in a particular situation which necessitates a different course of action on our part; in this case we may no longer process your personal data unless we can demonstrate that there are still legitimate compelling grounds for processing your data which take precedence over your rights. We may also continue processing your personal data despite your right to object if this is necessary in order to establish, exercise or defend legal claims.

Right to data portability

You have the right, in some cases, to receive your personal data in a structured, commonly used and machine-readable format and to have these personal data transmitted from one data controller to another without any hindrance from us. However, this right only applies when your personal data are being processed by automated means and on the basis of consent or a contract.

Complaints

You may file a complaint with the Danish Data Protection Agency if you wish to complain about our processing of your personal data:

The Danish Data Protection Agency

Carl Jacobsens Vej 35.

2500 Valby

Tel. +45 3319 3200

E-mail: dt@datatilsynet.dk

You may also contact the Danish Data Protection Agency at borger.dk.

Please contact us before filing your complaint to ensure that there is no misunderstanding; this is not mandatory, but we believe it is advisable in order to avoid any unnecessary complaints.

Miscellaneous

If you have any other questions about our processing of personal data, do not hesitate to contact us; please see our contact details above.

Yours sincerely,

Advokatfirma Holck-Andersen & Tyge Sørensen