

# Privacy policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our Website Visitors and Subject-Matter Experts.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our Website Visitors and Subject-Matter Experts; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 By using our website and agreeing to this Policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.5 In this policy, "we", "us" and "our" refer to Nordic Knowledge Partners ApS. For more information about us, see Section 13.

## 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

## 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 3.2 We may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process information contained in or relating to any communication that you send to us through our website ("**form data**"). The form data may include your name, address, phone number, email address, gender, date and year of birth, full bank account details, and your answers to questions

regarding compliance with our standard operating procedures. The form data may be processed for the purposes of performing our agreement with you, e.g. to ensure your payment for consultations completed, and for ensuring your eligibility (legal and ethical) to participate in future consultations with clients of us. The legal basis for this is consent and our legitimate interest, namely the proper administration of our business.

- 3.4 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.5 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.6 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data] where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.7 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 Financial transactions relating to our services are handled by our payment services providers, Danske Bank A/S and our contracted finance manager Team Plus A/S. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://danskebank.dk/erhverv> and <https://teampius.dk/>.

4.5 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. International transfers of your personal data**

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

5.2 The hosting facilities for our website and your personal data are provided by G Suite & Google Cloud (Google, Inc.). Google have gained confirmation of compliance from the European Data Protection Authorities for their model contract clauses, affirming that Google's current contractual commitments for G Suite and Google Cloud Platform fully meet the requirements under the Data Protection Directive to legally frame transfers of personal data from the EU to the rest of the world (<https://cloud.google.com/security/gdpr/>).

## **6. Retaining and deleting personal data**

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- (a) the period of retention of form data will be determined based on how long we need the data to perform our agreement with you and for financial record keeping as required by the tax and business authorities.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Amendments**

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of changes to this policy [by email or through the private messaging system on our website].

## **8. Your rights**

8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at EUR 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

8.2 We may withhold personal information that you request to the extent permitted by law.

8.3 You may instruct us at any time not to process your personal information for marketing purposes.

8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **9. Cookies used by our service providers**

9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

9.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:  
<https://www.google.com/policies/privacy/>.

## **11. Managing cookies**

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

### **13. Our details**

13.1 This website is owned and operated by Nordic Knowledge Partners ApS.

13.2 We are registered in the Kingdom of Denmark under registration number DK-36428198, and our registered office is at Dampfærgevej 9, 1. 2100 Copenhagen, Denmark.

13.3 Our principal place of business is at Dampfærgevej 9, 1. 2100 Copenhagen, Denmark.

13.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

### **14. Data protection officer**

14.1 Our data protection officer's contact details are: Andreas von Buchwald, [avb@nordicknowledgepartners.com](mailto:avb@nordicknowledgepartners.com), (+45) 40 99 38 22.