# PRIVACY POLICY

By using this website, <u>www.rlay.dk</u>, you accept that RLAY A/S processes your personal data in accordance with this data policy.

### 1. GENERAL:

1.1 RLAY is a company that puts the customer at the center. Through the delivery of quality products and services, RLAY aims to increase customer satisfaction, ensure long-term and profitable growth, and foster development and innovation for the benefit of the company's owners, employees, customers, and society as a whole.

We process general personal data about individuals employed by the company. RLAY also processes information about individuals who sign up for our newsletter, an event, or other engagements. In addition, we handle information about individuals who contact us in writing, including contact persons at customers and public authorities, and other organizations.

- 1.2 In this privacy policy, you will find information about how RLAY collects and processes information about you and what rights you have.
- 1.3 RLAY is the data controller for your personal data. Inquiries to RLAY can be made via the contact details listed under point 8.

# 2. WHAT PERSONAL DATA DO WE COLLECT, FOR WHAT PURPOSE, AND THE LEGAL BASIS FOR PROCESSING

# 2.1 Use of www.rlay.dk

When you use the website, we automatically collect information about the type of browser you use, the search terms you use on the website, your IP address, including your approximate network location, and information about your computer. Read more about our use of cookies in our cookies policy.

- 2.1.1 <u>The purpose</u> is to generate statistics on the use of the website, optimize the user experience and the website's functionality, and carry out targeted marketing via Facebook and Google.
- 2.1.2 <u>The legal basis</u> for processing is the EU General Data Protection Regulation (GDPR) Article 6, paragraph 1, letter f.

# 2.2 Information about employees of the company

RLAY collects the information you provide, such as name, email address, phone number, CPR number (personal identification number), bank details, tax and pension information, title, and job functions. When you communicate with us, we process the personal data you provide us.

- 2.2.1 <u>The purpose</u> is to manage and pay your salary. Accounting information based on salary payments is collected to comply with accounting law requirements.
- 2.2.2 The legal basis for processing is the EU GDPR Article 6, paragraph 1, letters b, c, and f.

## 2.3 Information about individuals not employed by the member company

When you write to RLAY regarding a position in the company (unsolicited or specific), we collect the information you provide, e.g., your name, address, or where you are employed, email, phone number. When you communicate with us in writing or by phone, we process the personal data you provide.

- 2.3.1 <u>The purpose</u> is to be able to contact you, comply with legal requirements, and handle your job inquiry relevant to the company.
- 2.3.2 The legal basis for processing is the EU GDPR Article 6, paragraph 1, letters b, c, and f.

# 2.4 Information about employees in ministries, politicians, etc.

We process contact information for employees in public authorities, politicians, and other organizations when we receive and respond to consultations and other written inquiries.

- 2.4.1 <u>The purpose</u> is to communicate with the individuals in connection with our company's positioning concerning the local area.
- 2.4.2 The legal basis for processing is the EU GDPR Article 6, paragraph 1, letter f.

#### 2.5 Photos

In connection with employment in the company and events organized by RLAY, photos (situational and portrait) are taken. The photos are displayed on <a href="www.rlay.dk">www.rlay.dk</a> and/or on Facebook, Instagram, and LinkedIn. Separate consent is obtained for portrait photographs.

2.5.1 <u>The purpose</u> is to provide mood photos from events and to use the photos for marketing similar events.

2.5.2 The legal basis for processing is the EU GDPR Article 6, paragraph 1, letters a and f.

#### 2.6 Newsletter, etc.

When you consent to receive news and offers from us, we collect information about your name, company name, email address, and possibly mobile number. When you receive the newsletter, we record whether you open it and which articles you click on.

- 2.6.1 <u>The purpose</u> is to deliver the newsletter, provide relevant news to readers, and market RLAY's services, events, and other products.
- 2.6.2 The legal basis for processing is the EU GDPR Article 6, paragraph 1, letter f.

#### 3. LEGITIMATE INTERESTS PURSUED WITH THE PROCESSING

As mentioned above, our processing of personal data is partly based on the rule of interest balancing (Article 6, paragraph 1, letter f). The interests justifying the processing are our interest in marketing our services, including offering you relevant services to retain you as a customer, as well as improving the website and generating statistics. Contact details for employees in public authorities, etc., are processed to safeguard our interest in being able to contact them in connection with our local community positioning.

#### 4. RECIPIENTS OF PERSONAL DATA

- 4.1 In connection with payroll processing, names, CPR numbers, bank details, and pension information are disclosed to partners managing our administration and financial systems. Physical participant lists are provided to other participants at the event during network events and seminars.
- 4.2 Information is provided to external partners who process the data on our behalf. We use external partners for payroll administration, technical operation of administration and financial systems, and website improvements. These partners are data processors under our instruction and process data for which we are responsible. Data processors may not use the information for purposes other than fulfilling the agreement with us and are bound by confidentiality. We have signed written data processing agreements with all data processors who process personal data on our behalf.
- 4.3 Google Analytics by Google LLC. and Facebook Inc. are established in the USA. The necessary guarantees for the transfer of information to the USA are ensured through the data processor's certification under the EU-U.S. Privacy Shield, according to the EU GDPR Article 45.

4.3.1 A copy of Google LLC's certification can be found here:

https://www.privacyshield.gov/participant?id=a2zt00000001L5AAI

4.3.2 A copy of Facebook Inc.'s certification can be found here:

https://www.privacyshield.gov/participant?id=a2zt000000GnywAAC&status=Active

#### 5. YOUR RIGHTS

5.1 To ensure transparency about the processing of your data, we, as the data controller, must inform you of your rights.

# 5.2 Right of access

- 5.2.1 You are entitled at any time to request information about, among other things, what information we have registered about you, the purpose of the registration, which categories of personal data and recipients of data there may be, and where the data comes from.
- 5.2.2 You have the right to receive a copy of the personal data we process about you. If you wish to receive a copy of your personal data, you must submit a written request to mail@rlay.dk. You may be asked to verify your identity.

### 5.3 Right to rectification

5.3.1 You have the right to have incorrect personal data about yourself corrected by us. If you become aware of errors in the data we have registered about you, you are encouraged to contact us in writing so that the information can be corrected.

### 5.4 Right to erasure

5.4.1 In certain cases, you have the right to have all or some of your personal data deleted by us, for example, if you withdraw your consent and we have no other legal basis to continue the processing. To the extent that continued processing of your data is necessary, for example, to comply with our legal obligations or to establish, exercise, or defend legal claims, we are not obligated to delete your personal data.

# 5.5 Right to restrict processing

5.5.1 In certain cases, you have the right to have the processing of your personal data limited to storage only, for example, if you believe the information we process about you is incorrect.

# 5.6 Right to data portability

5.6.1 In certain cases, you have the right to receive personal data that you have provided us in a structured, commonly used, and machine-readable format and have the right to transfer this information to another data controller.

# 5.7 Right to object

- 5.7.1 You have the right to object at any time to our processing of your personal data for direct marketing purposes, including profiling conducted to target our direct marketing.
- 5.7.2 You also have the right at any time to object, on grounds relating to your particular situation, to the processing of your personal data that we undertake based on our legitimate interests, cf. points 2.1 to 2.6.

## 5.8 Right to withdraw consent

5.8.1 You have the right at any time to withdraw a consent you have given us for a specific processing of personal data. If you wish to withdraw your consent, please contact us at mail@rlay.dk.

#### 5.9 Right to complain

- 5.9.1 You have the right to file a complaint with the Danish Data Protection Agency, Borgergade 28,
- 5, 1300 Copenhagen K, about our processing of your personal data. Complaints can be submitted, among other ways, via email at dt@datatilsynet.dk or phone +45 33 19 32 00.

#### 6. DELETION OF PERSONAL DATA

- 6.1 Information collected about your use of <u>www.rlay.dk</u>, cf. point 2.1, will be deleted at the latest when you have not used the website for 1 year.
- 6.2 Information collected in connection with your contact with us, cf. points 2.2 to 2.5, is stored in the system for as long as you are employed with us, until you are no longer in contact with us, or until we no longer have a valid reason to process your personal data.

#### 7. SECURITY

7.1 We have implemented appropriate technical and organizational security measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal data transmitted, stored, or otherwise processed.

### 8. CONTACT INFORMATION

- 8.1 RLAY A/S is the data controller for the personal data collected through www.rlay.dk.
- 8.2 If you have questions or comments about this Privacy Policy or want to exercise one or more of your rights described in points 5.1 to 5.8, you can contact:

#### **RLAY A/S**

Fredensborg Kongevej 60B, 3480 Fredensborg

Phone: +45 23 46 53 34

Email: mail@rlay.dk

### 9. CHANGES TO THE PRIVACY POLICY

9.1 This Privacy Policy is updated august 2024.