



Gefion
GROUP

Privacy policy for Gefion Group's websites "www.gefiongroup.com", "www.gefionboliger.dk", "www.gefionstudieboliger.dk", social media and external relations

Version: 15 July 2020

This privacy policy explains how Gefion Group A/S ("Gefion") processes personal data:

For each category of data subjects, the table below describes the personal data Gefion processes, for what purpose Gefion processes the personal data and the legal basis for the processing by Gefion.

Categories of data subjects	Personal data	Purpose (in addition to the general purposes below)	Legal basis
Visitors on our websites: www.gefiongroup.com www.gefionboliger.dk www.gefionstudieboliger.dk	IP address, operating system, language preferences, browser type, equipment type, MAC number (depending on the equipment), behaviour on the website, Facebook ID	To retrieve the website from the server, remembering language preferences, distinguishing users from one another, analysing user behaviour, optimising the site, targeting ads and delivering specific and concrete marketing material	The processing is based on legitimate interests in making the website available, in distinguishing users from one another, in remembering language preferences, in optimising the speed of the website and marketing, cf. Article 6(1)(f) of the General Data Protection Regulation (GDPR) The processing is based on consent, cf. Article 6(2)(f) of the GDPR Consent is based on section 3 of the executive order on cookies



Gefion

GROUP

Categories of data subjects	Personal data	Purpose (in addition to the general purposes below)	Legal basis
Visitors on social media	Name, e-mail address, telephone number, Facebook ID, LinkedIn ID	To be represented on social media, to be able to correspond with users, and to market Gefion's homes to buyers and tenants	The processing is based on legitimate interests in being represented on social media and answering enquiries, cf. Article 6(1)(f) of the GDPR Consent is based on section 3 of the executive order on cookies
Participants in events	Name, e-mail address and telephone number	Planning of events, sending out invitations to events, including, organisation and evaluation hereof	The processing is based on legitimate interests in offering, organising and evaluating events, cf. Article 6(1)(f) of the GDPR
Gefion's contact persons at: Suppliers Business partners	Name, address, title, e-mail address, telephone number, position	Contact to and entering into agreements with suppliers and business partners	The processing is based on the necessity of processing in order to enter into an agreement and on legitimate interests in the contact with suppliers, cf. Article 6(1)(b) and (f) of the GDPR



Gefion

GROUP

Categories of data subjects	Personal data	Purpose (in addition to the general purposes below)	Legal basis
Relatives of our employees	Name, telephone number, address, e-mail address, relation to the employee and time and content of contact	Contact to relatives in case contact is required	The processing is based on Gefion's legitimate interests in being able to communicate with relatives, cf. Article 6(1)(f) of the GDPR
Consultants	Name, telephone number, civil registration (CPR) no., address, e-mail address, position, work tasks, working hours and other employment matters	Calculation, reporting and payment of salary, out-of-pocket expenses, etc. as well as entering into an agreement with the consultant	The processing is necessary in order to fulfil the agreement with the consultant, cf. Article 6(1)(b) of the GDPR. Any reporting to the The Danish Tax Agency may be based on section 7 of the Danish Tax Control Act, cf. section 3(4) of the Danish Income Registry Act, cf. section 11(2)(i) of the Danish Data Protection Act, section 10(1) of the Danish Accounting Act, cf. Article 6(1)(c) of the GDPR

General purposes of the processing applying to all categories of data subjects:

Compliance with the Danish Data Protection Act and personal data legislation and other legitimate interests, e.g. communication with data subjects, documentation requirements, compliance with basic principles for processing of personal data and the legal basis for processing, implementation and maintenance of technical and



Gefion

GROUP

organisational security measures, investigation of suspected or known security breaches and reporting to individuals and authorities, handling of enquiries and complaints from data subjects and others, processing is necessary for the establishment, exercise or defence of legal claims, handling of inspections and enquiries from supervisory authorities, handling of disputes with data subjects and third parties, statistical surveys, mergers, acquisitions, disposals, sale of the company or parts thereof, including preparation of information memorandum, preparation and completion of due diligence, assessment of investments and other activities of such processes.

Consent

If the processing is based on your consent, you have the right to withdraw the consent. If you withdraw the consent, the withdrawal will however not affect the processing and disclosure prior to the withdrawal of the consent.

Sources

The personal data are collected from you, your equipment and/or from external parties, e.g. business partners, etc.

Data provided on a voluntary basis

When we collect personal data directly from you, you provide us with the personal data on a voluntary basis. If you do not provide us with the above personal data, we cannot make digital media available nor be in contact with you.

Transfer to data processors

We use a number of data processors, including hosting providers for IT systems, back-up and support, marketing agencies as well as web developers.

Disclosure of personal data

The above personal data will be disclosed to the following recipients:

- Suppliers of marketing services and digital services
- Intra-groups companies
- In connections with cookies on the websites
 - www.gefiongroup.com: Google LLC
 - www.gefionboliger.dk: Google LLC, Facebook Inc., Adform A/S and Cloudflare Inc.
 - www.gefionboliger.dk: Google LLC, Facebook, Inc. and Adform A/S

Transfer to recipients in countries outside the EU/EEA

We transfer personal data to the following recipients in countries outside the EU/EEA:

- Google LLC, Facebook Inc. and Cloudflare Inc. in the US based on the EU-U.S. Privacy Shield



Gefion GROUP

- Dropbox Inc. in the US based on EU's standard contractual clauses of 2010 for the transfer to data processors in third countries. The standard contractual clauses are available here: <https://eur-lex.europa.eu/legal-content/DA/TXT/PDF/?uri=CELEX:32010D0087&from=en>. You are welcome to contact Gefion for a copy hereof.

Storage period

We store personal data for as long as it is necessary to be able to fulfil the above-mentioned purposes, including storage for certain minimum periods pursuant to applicable tax legislation and the Danish Accounting Act (consultants), etc. or for as long as it is necessary in order to handle civil and criminal law claims, including in relation to rules of limitation.

We refer to our cookie declaration with regards to deletion of persistent cookies.

Your rights

You have – subject to the limitations in the Data Protection Act – the following rights:

- The right to access your personal data
- The right to rectification of inaccurate personal data
- The right to erasure personal data
- The right to restriction of processing of the personal data
- The right to data portability (where the processing is based on consent or on an agreement), i.e. the right to receive the personal data which the relevant person has provided to Gefion in a structured, commonly used and machine-readable format and the right to transmit those data to another data controller

You also have the right to file a complaint with the Danish Data Protection Agency.

Right to object

You have the right to object – on grounds relating to your particular situation – to the processing of personal data, where the legal basis is legitimate interests as specified above. Subsequently, Gefion may no longer process the personal data unless Gefion demonstrates compelling legitimate grounds for the processing which override your interests, fundamental rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

If personal data are processed for direct marketing purposes, you have the right to object, at any time, to the processing of your personal data for such marketing, which includes objecting to profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, the personal data will no longer be processed for such purposes.



Gefion
GROUP

Contact

If you have any questions about the processing of your personal data or your privacy rights, please contact Gefion.

Contact details:

Gefion Group A/S

Østergade 1, 1st floor

DK-1100 Copenhagen K

Denmark

Company reg. (CVR) no.: 37 04 25 60

E-mail address: privacy@gefiongroup.com

Tel.: +45 70 23 20 20