



Information on processing of personal data

1 Introduction

In this document, we provide the information, Kemp & Lauritzen A/S ("Kemp & Lauritzen", "we", "us", "our") is obliged to provide when processing personal data about you, as set out in regulation (EU) 2016/679 ("GDPR"), articles 13 and 14.

2 Data Controller

Unless otherwise stated for each of the specific processing activities, the data controller for the processing activities described in section 3 below, is:

KEMP & LAURITZEN A/S

CVR-no.: 57471719

Roskildevej 12

2620 Albertslund

E-mail: persondata@kemp-lauritzen.dk

3 Processing activities

Kemp & Lauritzen collects and processes personal data in many different situations, and the purposes of the collection, which data is processed and when it is erased will differ in each situation. The specific activities where Kemp & Lauritzen (as the data controller) may collect personal data about you are therefore individually described below.

3.1 Sale and delivery of goods and services

In connection with sale and delivery of goods and services, we process personal data about (contact persons at) our customers for the purpose of ensuring that goods and services can be delivered in the right place, and for the purpose of managing the customer relationship.

3.1.1 Categories of personal data

- Name
- (Working) address
- (Working) email address
- (Working) telephone number
- Name of the company you represent
- Information on goods and services ordered, including agreements on delivery of these
- Invoices
- Other correspondence



We obtain this information either directly from you or from the company you represent.

3.1.2 Legal basis

If you have purchased goods or services as a private individual or for a company personally owned by you, the legal basis is Article 6(1), para. (b), of the GDPR, as the processing is necessary for the performance of a contract.

Otherwise, the legal basis is Article 6(1), para. (f), of the GDPR, as the processing is necessary for us to pursue our legitimate interests in delivering goods and services as agreed and to manage the customer relationship effectively.

3.1.3 Recipients of personal data

Data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.1.4 Retention and erasure

Information is retained until five years from the end of the year of the latest financial transaction related to sale and delivery to you / the company you represent.

3.2 Marketing, including newsletters

If you have signed up for our newsletter, we process personal data about you for the purpose of sending newsletters and other marketing material and information about our company to you.

3.2.1 Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Information about areas/topics you wish to receive information about, including which newsletters you would like to receive
- Information about which newsletters, publications and other material we have set to you
- Information about your consent to receive newsletters and other types of marketing materials, including time for granting the consent, wording of the consent and information about withdrawal of the consent, where relevant.

3.2.2 Legal basis

The legal basis for our processing is Article 6(1), para. (f), of the GDPR, as the processing is necessary for us to pursue our legitimate interests in sending information about our business to persons who have requested this.

3.2.3 Recipients of personal data

Data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.



3.2.4 Retention and erasure

If you withdraw your consent to receive marketing material from us, including if you unsubscribe from newsletters or you in any other way inform us that you do no longer wish to receive marketing material from us, we will immediately stop sending marketing material to you.

This applies similarly if we have not used your consent to send marketing material to you for 12 consecutive months.

The information processed for the purpose of sending marketing material will be retained for two years from the end of the year, in which we stopped sending marketing material to you, as described above. We do so in order to be able to document the processing, including documenting the fact that a valid consent existed at the time when we were sending marketing material to you.

3.3 Website and social media

When you visit our website, we process personal data about you through the use of cookies and similar technologies in order to

- ensure a properly functioning website (e.g., to be able to adjust the layout to fit the type of device and browser, you are using to access the website)
- ensure that the website is relevant and user friendly (e.g., by remembering the preferences you have indicated when visiting the website, and by understanding which content is particularly interesting for visitors, so that such content may be made easily accessible).
- ensure that the website is secure – both for you as a visitor and for us.

The specific purpose of each individual cookie is described in our [cookie policy](#).

When you visit our pages on LinkedIn and Facebook, the provider of the platform collects information about you. This information is subsequently made available to us in an anonymized form in statistics for our pages. In these situations, we are joint controllers with the providers of the respective platforms. For further information, please visit [LinkedIn Pages Joint Controller Addendum](#) and [Facebook](#).

3.3.1 Categories of personal data

- Electronic identification data (IP address, cookies, etc.)
- Information on the equipment used to access the website, including the type of device (computer, tablet, smartphone, etc.), model, operating system and browser
- Information on your visits to the website over time, including information on how you use the website (e.g., which links you activate)

3.3.2 Legal basis

The legal basis for our processing is Article 6(1), para. (f), of the GDPR, as the processing is necessary for us to pursue our legitimate interests in ensuring an effective, relevant, well-functioning and secure website, and to understand the users' interests in relation to our site and postings on social media.

3.3.3 Recipients of personal data

As mentioned above, we are joint controllers with LinkedIn and Facebook.



Furthermore, data is disclosed to other companies placing third-party cookies on our website and made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

In connection with the processing, the personal data may be transferred to countries outside the EU/EEA (third countries). These countries include USA and other countries where LinkedIn and Meta (Facebook) or their sub-processors are established. We ensure that your rights are protected, and that the level of protection is maintained in connection with these data transfers, for example through standard contracts approved by the European Commission cf. Article 46(2), para (c), of the GDPR. For a copy of these standard contracts, please contact us (see Section 2 above).

3.3.4 Retention and erasure

Please refer to our [cookie policy](#) for further information on the retention periods for the individual cookies.

3.4 Suppliers and business partners

If you are (a contact person at) a supplier or business partner of Kemp & Lauritzen, we may process personal data about you in order to manage our relationships with suppliers and business partners efficiently.

3.4.1 Categories of personal data

- Name
- (Working) address
- (Working) email address
- (Working) telephone number
- Name of the company you represent
- Correspondence and trading history

We obtain this information either directly from you or from the company you represent.

3.4.2 Legal basis

If you are cooperating with us as a private individual or through a company personally owned by you, the legal basis is Article 6(1), para. (b), of the GDPR, as the processing is necessary for the performance of a contract.

Otherwise, the legal basis is Article 6(1), para. (f), of the GDPR, as the processing is necessary for us to pursue our legitimate interests in managing the relationship with our suppliers and business partners effectively.

3.4.3 Recipients of personal data

Data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.4.4 Retention and erasure



We store the information for 5 years from the end of the year, in which we had the latest financial transaction with you / the company you represent.

3.5 Disputes and litigation

If you are a party or a witness in a dispute or litigation, where Kemp & Lauritzen is also a party or otherwise involved, we may process personal data about you for the purpose of looking after our interests in the dispute or litigation.

3.5.1 Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Information on where you work
- Information related to the relevant dispute or litigation, including information on criminal offences
- Information about your role (party, witness, etc.)

3.5.2 Legal basis

The legal basis for our processing of information about criminal offences is section 8(5) of the Danish Data Protection Act, cf. section 7(1) of the Danish Data Protection Act, cf. Article 9(2), para. (f) of the GDPR.

Furthermore, the legal basis for our processing of information about criminal offences as well as for other personal data is Article 6(1), para. (f), of the GDPR, as the processing is necessary for us to pursue our legitimate interests in establishing, exercising or defending a legal claim.

3.5.3 Recipients of personal data

Personal data may be disclosed to law enforcement, courts, arbitration institutions, lawyers and other advisors supporting us.

Furthermore, data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.5.4 Retention and erasure

Information is retained for 10 years from the end of the year, where the actual dispute or litigation is finalized.

3.6 Camera surveillance

At some of our locations, we utilize camera surveillance (CCTV) for the purpose of preventing or - where relevant - investigating crime and other irregularities.

3.6.1 Categories of personal data



- Video recordings (camera surveillance)
- Details, if any, on criminal offences

3.6.2 Legal basis

The legal basis for our processing of information on criminal offences is section 8(3) of the Danish Data Protection Act, as the processing is necessary for us to pursue our legitimate interests in investigating criminal offences and other irregularities at the locations in scope, and our legitimate interests in the preventive effect of camera surveillance.

The legal basis for our processing of other information is Article 6(1), para. (f) of the GDPR, as the processing is necessary for us to pursue our legitimate interests in preventing criminal offences on our locations as well as our legitimate interests in investigating criminal offences and other irregularities that may occur.

3.6.3 Recipients of personal data

Data may be disclosed to law enforcement.

Furthermore, data is made available to IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.6.4 Retention and erasure

Recordings are as a general rule retained for 30 days. However, if necessary to investigate or document a specific incident, or to establish, exercise or defend a legal claim, the recordings may be retained for as long as necessary to pursue this purpose.

3.7 Job applicants

If you apply for a job with Kemp & Lauritzen, we process personal data about you in order to process your application and to identify the candidate who, from an overall assessment, would be the best fit for the position in question.

3.7.1 Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Information on educational background, including certificates and diplomas
- Information on specific competencies, including certificates (where relevant)
- Information on prior and current jobs
- Information accessible on the open part of your profile on social media or otherwise publicly available
- Information on criminal offences and convictions (a copy of your criminal record – only applicable to candidates where this is relevant for the position in question)



- Results of tests (skills and personal profile)
- References to the extent you give your consent to us collecting these

Criminal record is obtained from the police. Furthermore, information is collected from references you have allowed us to contact. Other information is as a general rule collected either directly from you or from publicly available sources, such as the open part of your profile on social media, or from advisors (head-hunters) supporting us in the recruitment process.

3.7.2 Legal basis

The legal basis for our processing of information on criminal offences and convictions (criminal record) is section 8(3) of the Danish Data Protection Act, as the processing is necessary for us to pursue our legitimate interests in ensuring that candidates for jobs with Kemp & Lauritzen have not been convicted for offences that may be considered incompatible with the position to possibly be held.

The legal basis for our processing of other information is partly Article 6(1), para. (b) of the GDPR, as the processing is necessary in order to take steps at your request prior to entering into a contract, and partly Article 6(1), para. (f) of the GDPR, as the processing is necessary for us to pursue our legitimate interests in assessing candidates for positions with Kemp & Lauritzen to select the candidate who from an overall perspective is the best suited candidate for the specific position.

Information collected from references is processed on the basis of Article 6(1), para. (a), of the GDPR, though.

3.7.3 Recipients of personal data

Information may be disclosed to head-hunters, lawyers and other advisors assisting Kemp & Lauritzen in connection with the recruitment.

Furthermore, data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.7.4 Retention and erasure

Information about candidates, who are subsequently employed by Kemp & Lauritzen, is transferred to our HR system and stored in accordance with the retention periods for information about current and prior employees, as described in our privacy notice for employees, which you will have access to as part of your employment with us.

For other candidates, information is retained for up to 6 months from the end of the month in which the candidate receives a final notice of rejection for the position in question.

3.8 Handling of queries and other administrative purposes

If we receive personal data about you in the context of other purposes than the purposes described in sections 3.1 - 3.7 above, including if you interact with us on social media, we process this information for the purpose of handling your query (or the situation leading to us receiving personal data about you).

3.8.1 Data to be processed and its origin

- Name
- Email address



- Telephone number
- Address
- Other information you may provide to us or that is otherwise relevant for a correct and effective handling of the matter.

3.8.2 Legal basis

The legal basis for our processing is Article 6(1), para. (f), of the GDPR, as the processing is necessary for us to pursue our legitimate interests in handling queries and other interactions with Kemp & Lauritzen in a correct, effective, and appropriate manner.

3.8.3 Recipients of personal data

Data is made available to IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.8.4 Retention and erasure

If your query leads to financial transactions, we will retain the information for 5 years from the end of the year, the latest transaction relates to. For other queries (not involving financial transactions), we will retain the information for two years from the end of the year of latest activity related to the specific matter.

4 Retention and erasure under special circumstances

We may retain personal data for longer than the retention periods stated for each of the processing activities described in section 3 above, where this is necessary for complying with a legal obligation to which we are subject, or to establish, exercise or defend a legal claim.

5 Your rights

As a data subject, you have the following rights related to our processing of personal data about you:

- **Right to withdraw consent:** In situations where our processing of personal data is based on your consent, cf. Article 6(1), para. (a) or Article 9(2), para. (a) of GDPR, you have the right to withdraw your consent at any time. Please note that withdrawal of consent will not affect the lawfulness of processing having taken place before the time of your withdrawal of the consent.
- **Access:** You have the right to be informed if we are processing personal data about you, and where this is the case, you have the right to obtain receive certain information about the processing as well as access to a copy of the data we process about you.
- **Rectification:** If the personal data we process about you is incorrect or incomplete, you have the right to have such personal data rectified or completed.
- **Erasure:** In certain situations, you have the right to have personal data about you erased.
- **Restriction of processing:** In certain cases, you have the right to restriction of processing of your personal data. If the right applies, we may then only process the data – except for retention – with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another person or for reasons of important public interest.



- **Data portability:** In certain cases, you have the right to receive a copy of the personal data you have provided in a structured commonly used and machine-readable format.
- **Right to object:** To the extent our processing of personal data about you is based on Article 6(1), para. (f) of GDPR, you have the right to object to the processing on grounds relating to your particular situation. ***If the purpose of the processing is direct marketing, you have an unconditional right to object to the processing at any time.***

If you wish to exercise your rights, please contact us at persondata@kemp-lauritzen.dk. Your request will be processed in accordance with the legislation in force at the given time. To the extent necessary, we will contact you and ask for additional information required to handle your request correctly.

Please be aware that certain conditions and limitations apply for each of the rights. Therefore, we might not be obliged to meet your request, or only obliged to meet your request partly.

For further information about your rights, please visit <https://www.datatilsynet.dk/english>.

6 Right to file a complaint with a supervisory authority

You have a right to file a complaint about our processing of personal data about you with a supervisory authority at any time. In Denmark, this would be the Danish Data Protection Agency (Datatilsynet), Carl Jacobsens Vej 35, DK-2500 Valby. A complaint may be filed by email to dt@datatilsynet.dk or through the website of the Danish Data Protection Agency www.datatilsynet.dk.

We do, however, recommend that you contact us before you file a complaint with a supervisory authority – please find our contact information in Section 2 above..

7 Updating our privacy policy

Kemp & Lauritzen may update this privacy policy on an ongoing basis when this is necessary to provide a fair description of our processing of personal data.

In the event of material changes to our processing of your personal data already in our possession, you will be notified directly of the update (e.g. by email).

This privacy policy was last updated in February 2024.