

# Privacy Policy

## ***Employees and applicants at Medicon Valley Alliance (MVA) as well as members of the Board of Directors***

As a company responsible for data, data protection is very important to us. We are guardians of the personal information which we process and we make sure that we comply with data protection legislation.

We give the people whom we process information about ("the registered") information about our data processes and about the rights one has as a registered individual.

In this privacy policy, we describe our processing of information about our employees.

## **Who we are - and how you can contact us**

*The identity and contact information of the company responsible for data*

**Name**                    *Medicon Valley Alliance f.m.b.a.*  
**Address**                *Arne Jacobsens Allé 15, 2.*  
**Address**                *2300 Copenhagen S*  
**CVR no.**                *DK25668294*  
**Tel.:**                    *+45 7020 1503*  
**E-mail:**                *mva@mva.org*  
**Web:**                    [www.mva.org](http://www.mva.org)

## **Our processing of personal information**

### ***Categories of personal information***

The information which we process about you may include:

### ***Information about applicants:***

When you apply for a position at Medicon Valley Alliance and during your employment at Medicon Valley Alliance, we collect and process the following types of personal information about you:

- General personal information, including
  - your identity and contact information including private address, telephone number and e-mail address
  - education, previous employments and other information contained in your CV
  - age, gender, country of employment, department, segment/function, wage bracket, salary
  - information collected from references
  - information in connection with a personality test if such has been conducted. This is, for example, in the hiring of senior staff and in various teams where there is a need for development with skills.

- information that is included in our correspondence with you
- CPR number
  - When you are an applicant, we can process information about your CPR number, if you have given us consent for this and we have a relevant and objective purpose, e.g. in connection with the recruitment process.
- Information on criminal circumstances
  - If you are applying for a position where it is necessary that we see your criminal record, we will ask you to obtain your criminal record and give it to us. We will also ask for your specific consent so that we may see and possibly retain the criminal record.

### *Information on employees and previous employees:*

If you are employed at Medicon Valley Alliance, in addition to the above, we collect and process the following types of personal information about you:

- General personal information, including
  - salary, bank account and tax information and pension considerations
  - information on personal performance
  - information on holiday, illness and other absences
  - information about IT equipment and telephones which Medicon Valley Alliance provides for use in your work
  - information on registration number for your private vehicle and travel route in connection with work-related travel and meetings
  - your signature
  - information about your family members
  - information about your use of e-mail and the internet
  - information about your use of company phone/mobile phone
  - any information received as part of the Medicon Valley Alliance group's whistleblower scheme
  - information on termination of employment, including any redundancy or summary dismissal
  - portrait image for use for access card and use on our website under contact information
- CPR number
  - When you are employed in Medicon Valley Alliance, we process information about your CPR number to be able to identify you unequivocally when we are to report information about your salary, etc. in accordance with the rules in tax legislation on reporting obligation.
- Sensitive personal information
  - Membership of a trade union in connection with any disputes
  - Health conditions (work-related injuries, absenteeism including fit for work certificates and medical certificates, information on maternity/paternity leave in connection with refund of unemployment benefits, reduced-hours jobs or recruitment on special conditions, e.g. in the case of disabilities).
- Information on criminal circumstances
  - Any information on criminal circumstances received as part of the Medicon Valley Alliance group's whistleblower scheme

## *Information on members of the Board of Directors:*

If you have been elected or appointed to the board for Medicon Valley Alliance, we collect and process the following types of personal information about you:

- General personal information, including
  - your identity and contact information including private address, telephone number and e-mail address
  - place of employment and position description
  - your official CV, your biography and portrait image for use on our website
  - information that is included in our correspondence with you
  - your signature on the accounts, etc.
  - salary, bank account and tax information if you are paid directors' fees
  - information on registration number for your private vehicle and travel route in connection with board-related travel and meetings if such expenses are to be reimbursed.
  
- CPR number or passport
  - When you are a member of the Board of Directors for Medicon Valley Alliance, we process information about your CPR number to be able to identify you unequivocally to the Danish Business Authority when we are to report information about your identity in accordance with the rules of companies legislation. If you do *not* have a Danish CPR number, we will instead forward a scanned image of the first page in your passport to the Danish Business Authority.

## ***Purpose and legal basis***

Our data processing has the following purposes:

- Administration of staff, including administrative processing in connection with recruitment. Administration takes place on the basis of applicable legislation and other centrally established rules as well as negotiations and agreements concluded between parties of the labour market as well as locally and individually concluded contracts concerning salary and employment terms.
- The purpose for members of the Board of Directors and members of the executive board is to be able to carry out the statutory reporting to the Danish Business Authority.
- Statistical purposes.

### ***The legal basis for our processing of personal information is:***

- The legal basis for processing of your CPR number is – until you become employed – your consent, cf. section 11(2)(2) of the Data Protection Act. You may at any time withdraw your consent, after which we, in the future as a starting point, may no longer store your CPR number. However, if we have another legal basis for processing the information, we will still be able to process the information. A withdrawal of the consent will also not affect the legality of the processing, which we have done prior to the withdrawal.
- When you are employed, the basis for the processing of your CPR number the rules in tax legislation on reporting obligation and section 11(2)(1) in the Data Protection Act.
- Health information will be processed in accordance with legislation. For example, the legal basis for the processing of health information as part of employment on special conditions is the special act that governs the special form of employment.
- Any criminal offences in criminal records will be processed with your express consent, cf. section 8(3) of the Data Protection Act. You may at any time withdraw your consent, after which we, in the future as a starting point, may no longer process the information. However, if we have another legal basis for processing the information, we will still be able to process the information. A withdrawal of the consent will also not affect the legality of the processing, which we have made prior to the withdrawal.
- The legal basis for the processing of personal information that is included in personality tests and the results of the test is your consent, cf. section 6(1) of the Data Protection Act, cf. paragraph 6(1)(a) of the Data Protection Regulation. You may at any time withdraw your consent, after which we in the future as a starting point may no longer process the information. However, if we

have another legal basis for processing the information, we will still be able to process the information. A withdrawal of the consent will also not affect the legality of the processing, which we have made prior to the withdrawal.

- When we register information that is required in accordance with the Accounting Act or as a part of the reporting obligation to the tax authorities, the legal basis is section 6(1) of the Data Protection Act, cf. paragraph 6(1)(c) of the Data Protection Regulation relating to processing which is necessary in order to comply with a legal obligation which is the responsibility of the data controller.
- The legal basis for our collection and registration of information on the use of e-mail and the internet is section 6(1) of the Data Protection Act, cf. paragraph 6(1)(f) of the Data Protection Regulation on processing which is necessary for a legitimate interest that is not exceeded with regard to the registered parties. The legitimate interests that may justify the investigation of an employee's internet use or e-mail account may, for example, be with regard to operations, security, restoration and documentation, as well with regard to checking the employee's use of the internet or e-mail.
- The legal basis for our processing of information on an employee's use of telephony, including mobile phones is section 6(1) of the Data Protection Act, cf. paragraph 6(1)(c) of the Data Protection Regulation on processing which is necessary in order to comply with a legal obligation which is the responsibility of the data controller, including obligations to make certain checks that free mobile phones are not used for payment of private purposes.
- The legal basis for our collection and registration of the other personal information is section 6(1) of the Data Protection Act, cf. paragraph 6(1)(f) of the Data Protection Regulation on processing which is necessary for entering into an employment contract and for the performance of the employment contract.
- The disclosure of information about you may take place in compliance with the processing rules in the data protection legislation and other Danish legislation. In each case, we will assess whether the disclosure requires your explicit consent or whether the disclosure may take place on another legal basis.
- **Statistical purposes**  
Information on salary and absence, etc. is also used to configure various statistics, including statistics on absence due to illness, in which we cross-reference information about different employees to form a necessary overview. The legal basis is section 6(1) of the Data Protection Act, cf. paragraph 6(1)(e) of the Data Protection Regulation on processing which is necessary for the purpose of performing a task in the interests of society. Only information that is necessary for the survey is used, and the information will not be used for other purposes than pure statistics.

### **Categories of recipients**

We disclose or hand over personal information about our employees to the following categories of recipients:

- Tax authorities and other authorities in connection with statutory reports
- Bankers in connection with the payment of salary
- Pension companies in connection with pension
- Competence foundations and trade unions in connection with further training and salary reimbursement
- External advisors, our attorneys, etc.
- Customers and cooperating partners of *Medicon Valley Alliance*, whom you assist in servicing, receive information such as your name and your position in connection with administrative processing, etc.
- Our data processors on the basis of data processing agreements.

### **Deletion**

We delete information about you when it is no longer necessary.

As an applicant, if you are not offered a job at *Medicon Valley Alliance*, we will save your application and the other personal data for as long as necessary for the purposes that we have outlined above. Data on the application will be deleted no later than 6 months after the date of the application deadline.

*Medicon Valley Alliance* generally follows the retention period that applies in accordance with the Accounting Act. In order to be able to document our administrative processing and to be able to live up to our obligations, we have assessed that it is necessary to save all information for up to five years plus the current year after resignation. However, if you have worked on a project, it is the provisions for this project that are guidelines for the retention period. This can be for up to 15 years in some cases.

### **Your rights**

In accordance with legislation, you have a number of rights in relation to our processing of information about you.

You can exercise your personal data rights by contacting us. You will find our contact details at the top of this policy.

When you have requested access to information about yourself, to get it corrected or deleted or if you have objected to our data processing, we will investigate to see if it is possible to accommodate your wish. We will respond to your inquiry as quickly as possible and no later than one month after we have received your inquiry.

## Your rights

- **Right to see information (right of access)**  
You have the right to have access to the information that we process about you as well as a variety of additional information.
- **Right of rectification (correction)**  
If you believe that the personal data which we process about you is inaccurate, you have the right to have it corrected. You must contact us and tell us where the inaccuracies are and how they can be corrected. We must in all instances decide whether or not we believe your request is justified. When you contact us with a request to have your personal data corrected or deleted, we will investigate whether the conditions have been met, and if so, we will implement changes or the deletion as quickly as possible.
- **Right to deletion**  
We generally delete personal data when it is no longer necessary. In special cases, you have the right to have specific information about you deleted up until the time when our normal, general deletion takes place. This applies, for example, if you retract your consent and we do not have another basis to process the information. If you believe that your data is no longer necessary in relation to the purpose for which we collected it, you can ask for it to be deleted. You can also contact us if you believe that your personal data is processed in violation of the law or other legal obligations.
- **Right to limitation of processing**  
If you contest information that we have registered or in any other way process, you may request that we limit the processing of the information until we have been able to determine if the information is correct. You may also request limitation instead of deletion if you believe our processing of the information is illegal or if you believe we no longer need the information or if you believe your legitimate interests precede the legitimate interests of the data controller. If it is found in your favour that our processing is to be limited, we may in the future only process the information with your consent or in order for legal requirements to be established, enforced or defended or to protect a person or important social interests.
- **Right to transmit information (data portability)**  
You have the right to receive personal data which you have made available to us and which we have obtained about you from other players on the basis of your consent. If we process data about you as part of a contract in which you are a party, you may also have the data sent to you. You also have the right to transfer this personal data to another service provider. You may also ask us to have the information sent directly from the data controller to another authority or company. If you want to exercise your right to data portability, you will receive your personal data from us in a commonly used and machine-readable format.
- **Right to object**  
You have the right to raise objections to our processing of information about you. You may also object to our disclosure of your data for marketing purposes. You can use the contact information at the top to send an objection. If your objection is justified, we will ensure to cease the processing of information.
- **Right to receive information about new purposes**  
If we wish to use information about you for a purpose other than the purposes which we have previously disclosed to you, for example in this privacy policy, you have the right to receive information about this before we process the information further for the other purpose.
- **Right to withdraw your consent**  
If our processing of your information takes place on the basis of your consent, you may withdraw the consent at any time. If you withdraw the consent, we may be no longer process the information. Withdrawal of consent does not affect the legality of the processing that is based on consent prior to the withdrawal. If we have another legal basis for processing than consent with an independent purpose – for example retention of information for compliance with the rules concerning accounting – this processing will still continue to take place.

If you are not satisfied with our response, you have the possibility to appeal to the Danish Data Protection Agency. In general, if you are dissatisfied with the way in which your personal information has been processed, you may appeal to the Danish Data Protection Agency, which will then investigate the matter and make a decision.

You can find the Danish Data Protection Agency's contact information at [www.datatilsynet.dk](http://www.datatilsynet.dk).

NOTE! You can write to the Danish Data Protection Agency via Digital Post on [Borger.dk](http://Borger.dk), where the transmission of your inquiry will be secure (encrypted). We recommend that you use Digital Post, if your inquiry contains confidential or sensitive personal information.