

## Privacy policy – LOWENCO A/S

Here at 'LOWENCO A/S' ('LOWENCO', 'we', 'us' or 'our'), confidentiality and data security are top priority. This privacy policy applies to our processing of personal data, establishes guidelines for LOWENCO's handling of your own personal data and gives you the information which you are entitled to receive pursuant to current data protection legislation. You must read this privacy policy before you provide LOWENCO with your personal data.

### 1. Data controller and contact details

The data controller for your personal information is:

Company: LOWENCO A/S  
Address: Bavnevej 10, 6580 Vamdrup, Denmark  
CVR no: 34582424  
Email: info@lowenco.com  
Telephone number: +45 3840 0300

### 2. Website: [www.lowenco.com](http://www.lowenco.com)

#### 2.1 Cookies

##### Types of personal data

LOWENCO uses cookies on its website, [www.lowenco.dk](http://www.lowenco.dk), and processes your personal data in that regard. LOWENCO may collect the following personal information about you when you visit our website:

- IP address
- MAC address
- Browser history
- Information about your use of our website, including click behaviour.

We use cookies to collect the aforementioned personal data. You can read more about the use of cookies in our cookie policy, available at the following link: <http://lowenco.com/wp-content/uploads/2022/06/cookie-policy.pdf> or by clicking on our cookies solution.

##### Processing purposes

Your personal data may be processed for the following purposes:

- General marketing
- Product and service development
- Statistics and analysis

### Basis for processing

Your personal data is processed by LOWENCO on the following basis:

- *Legitimate interests:* We base the processing of your personal data on our legitimate interests in, for example, producing statistics, conducting analyses, providing support, as well as improving and developing our products and services (General Data Protection Regulation (GDPR 6,1,f)).

Whenever you visit our website, we ask for your informed consent to store non-functionality cookies in accordance with cookie regulations. You have the right to withdraw your consent at any time. You can read more about how to change your cookie settings in our cookies policy here: <http://lowenco.com/wp-content/uploads/2022/06/cookie-policy.pdf>.

### Retention period

Cookies are deleted in accordance with our cookies policy, available here: <http://lowenco.com/wp-content/uploads/2022/06/cookie-policy.pdf>.

The information may be retained for a longer time in an anonymised form, however.

## **2.2 If you use the contact form on the website, contact customer service or communicate with us in some other way**

### Types of personal data

LOWENCO collects and processes your personal data whenever you use the contact form on the website, [www.lowenco.com](http://www.lowenco.com), contact customer service or communicate with us in some other way. LOWENCO collects, processes and stores the following types of personal data for you:

- Name, email address, telephone number
- What your enquiry is about
- Date of your enquiry
- Other information you provide in connection with your enquiry. We encourage you to avoid giving us sensitive personal data, unless this is strictly necessary for the processing of your enquiry. In this regard, information should always be sent in a heavily encrypted form, should you ever send it by e-mail.

### Processing purposes

Your personal data is processed for the following purposes:

- Handling of your enquiry
- General communication
- Statistics and analysis

### Basis for processing

Your personal data is processed by LOWENCO on the following basis: The basis will depend on the nature of your enquiry.

- *Legitimate interests:* We may process your personal data on the basis of our legitimate interests in handling your enquiry, communicating with you and developing our products and services (General Data Protection Regulation (GDPR 6,1,f)).

- *Contractual obligations:* If your enquiry is regarding the entering into of a (potential) agreement, we will process your data so that we can make arrangements prior to entering into the agreement (GDPR 6,1,b).

#### Forwarding

We may forward your personal data to external suppliers who are enlisted to provide the service that you book based on their agreement with us. This forwarding will be based on our legitimate interests in being able to provide the service you are requesting (GDPR 6,1,f).

#### Retention period

Your personal data will be retained until we have processed your enquiry. This information may be retained for longer in an anonymised form, however.

If you are a customer or an employee of one of our customers, suppliers or other partners, please refer to the section below.

### 3. [If you apply for a job at LOWENCO](#)

If you apply for a job at LOWENCO, we will process your personal data as part of the recruitment process. We advise against including your CPR number or sensitive personal data, e.g. your racial or ethnic background, religion, trade union affiliations, sexual orientation or medical details, in your application.

#### Types of personal data

LOWENCO may collect, process and store the following types of personal data about you:

- Contact details such as name, email address and telephone number
- Information that is apparent from your application, CV and any attachments
- Relevant information that is publicly available on the internet and social media, including specific information about previous employment, activities, skills, performance and general conduct
- Results of personality tests, if you have done any
- Your criminal record, if this is required in relation to the position you have applied for
- References from previous and/or current employers you have named in your application, or for whom you have given your consent to us contacting
- Credit rating checks if the position you have applied for involves financial responsibility (e.g. book-keeping or auditing)
- Medical information, if the position you have applied for requires you to meet certain health criteria
- Other information you give us in connection with the recruitment process

#### Processing purpose

Your personal data will be used to assess whether we wish to offer you a position at LOWENCO.

#### Basis for processing

Your personal data is processed by LOWENCO on one or more of the following bases:

- *Legitimate interests:* We may process your personal data according to our legitimate interests in assessing whether we wish to offer you employment, including on the basis of the information you provide in your CV, application and any attachments, on the basis of relevant information that is publicly available on the internet and social media, the results of personality tests, references from persons named in your application and any

other information you give us in connection with the recruitment process. If the position applied for involves financial responsibility (e.g. book-keeping or auditing), we may – according to a specific evaluation – collect information about your credit rating. This processing may also be necessary for our legitimate interests in defending or asserting legal claims (GDPR 6,1,f).

- *Consent:* If we need to collect references from previous and/or current employers that you have not named as references in your application, we will only do so if you have given your consent to this (GDPR 6,1,a). If we need to check your criminal record as part of our evaluation, we will ask for your consent before doing this (GDPR 8,3). If the position you have applied for, in exceptional cases, requires you to meet certain health-related requirements, we will – following a specific evaluation – ask for your express consent before processing this kind of personal data (GDPR 9,2,a and 6,1,a).

#### Retention period

If you are offered a position at LOWENCO, your application, and any additional personal data of relevance that is collected during the recruitment procedure, will be stored in a staff file we keep for you.

If you are not offered a position, we will store your application, and any additional personal data that is collected during the recruitment procedure, for a period of six months after the rejection, unless you have given your consent to this kind of personal data being retained for longer.

You may at any time withdraw any consent you have given as part of our recruitment procedure. Withdrawing your consent will have an effect on future processing of your personal data; it will not, however, affect the legality of the processing that was done based on the consent given prior to withdrawal. If you wish to withdraw your consent, you may contact us as specified below.

Any copy of your criminal record will be deleted immediately after we have reviewed it.

#### 4. [If you are a supplier, partner, etc.](#)

This section outlines the policy for LOWENCO's processing of personal data for owners of sole proprietorships or contacts of suppliers or other partners who collaborate with LOWENCO.

#### Collection of personal data

LOWENCO may collect, process and store your personal data in the following cases:

- When your company, or the company you work for, enters into an agreement with LOWENCO
- When you have shown interest in LOWENCO's products and services, e.g. by giving LOWENCO your business card
- When you collaborate and communicate with LOWENCO

#### Types of personal data

LOWENCO may collect, process and store the following types of personal data about you:

- Name, email address, telephone number and corresponding contact details
- Individual information, e.g. preferred language
- Organisational information such as the company's name and address, job title, field of employment, main place of work and country
- Contract-related information, such as orders, invoices, contracts and other agreements between your

- company (or your employer) and LOWENCO, which might include your contact details (for instance)
- Financial information, such as terms of payment, bank details and credit rating checks (for sole proprietorships)

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This kind of information is either received from you directly (primarily through emails and other correspondence with you) or from a third party, e.g. your employer.

#### Processing purposes

Your personal data may be processed for the following purposes:

- General planning, execution and administration of collaborations, including contracts
- Administration such as processing of payments, evaluation of credit rating checks, accounting, auditing, as well as to provide support.
- Marketing
- Processing queries you have sent
- General communication
- Product and service development
- Statistics and analysis
- Compliance with current legislation and regulations e.g. fulfilment of our obligations to prevent unlawful activities
- Conflict management

#### Basis for processing

Your personal data is primarily processed by LOWENCO on one or more of the following bases:

- *Contractual obligations:* In certain cases, the processing of your personal data will be necessary to make the performance of a contract possible (GDPR 6,1,b).
- *Legitimate interests:* We may process your personal data against the background of our legitimate interests in, for example, administration of day-to-day operations using lawful and fair business practice, including planning, execution and administration of the collaboration, or our legitimate interests in, for example, conducting assessments of credit checks, producing statistics, conducting analysis, carrying out marketing activities (where consent is not essential), providing support and improving and developing our products and services. This processing may also be necessary for our legitimate interests in preventing fraud or establishing, defending or asserting legal claims (GDPR 6,1,f).
- *Legal obligation:* The processing of your personal data will, in some cases, be necessary in order to meet certain legal obligations, e.g. our obligation to prevent unlawful activities (GDPR 6,1,c).

#### Retention period

Your personal data will be stored for ten years after delivery of the product/service. This information may be retained for longer in an anonymised form, however.

## 5. If you visit our sites in person

### 5.1 When you supply goods to us

#### Types of personal data

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When you deliver goods to our sites in person, LOWENCO will process your personal data through access control and CCTV surveillance. LOWENCO may collect, process and store the following types of personal data about you:

- Your name
- Your employer
- Your telephone number
- Your number plate
- Digital footprints, including information about when you arrived and departed
- Photo and video material in connection with TV surveillance

#### Processing purposes

Your personal data is processed for the following purposes:

- To give you access to our physical sites
- To provide security at our physical sites
- To prevent and solve crime at our physical sites

#### Basis for processing

Your personal data is processed by LOWENCO on the following basis:

- *Legitimate interests:* We base the processing of your personal data on our legitimate interests in being able to give you physical access to our physical sites and protecting our physical sites (GDPR 6,1,f). Information about criminal offences gathered via CCTV surveillance will also be processed pursuant to LOWENCO's legitimate interests in solving crime (GDPR 8,3).

#### Retention period

Your personal data will be stored for six months from the point of recording onwards. This information may be retained for longer in an anonymised form, however.

## **5.2 When you visit our office facilities and other buildings**

#### Types of personal data

When you visit our office facilities and other buildings, LOWENCO will process your personal data through access control, CCTV surveillance and registration of guests. LOWENCO may collect, process and store the following types of personal data about you:

- Your name
- Your employer
- Your email address
- Your telephone number
- Your number plate
- Date and time of your visit
- Digital footprints, including information about where and when you used your access card
- Photo and video material in connection with TV surveillance

#### Processing purposes

Your personal data is processed for the following purposes:

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- For physical access to our office facilities and other buildings
- For administration of your visit to our premises
- To ensure security at our office facilities and other buildings
- To prevent and solve crime at our office facilities and other buildings

#### Basis for processing

Your personal data is processed by LOWENCO on the following basis:

- *Legitimate interests:* We base the processing of your personal data on our legitimate interests in being able to give you physical access to our office facilities and other buildings and in protecting our sites (GDPR 6,1,f). Information about criminal offences gathered via CCTV surveillance will also be processed pursuant to LOWENCO's legitimate interests in solving crime (GDPR 8,3).

#### Retention period

Your personal data will be stored for a maximum of six months from the point of recording onwards. This information may be retained for longer in an anonymised form, however.

Recordings from CCTV surveillance set up for crime prevention purposes will be retained for a maximum of 30 days.

## 6. [If you visit our profiles on social media](#)

Our website contains links to other websites. We are not responsible for the content of other companies' websites or their practice in relation to collection and processing of personal data. When you visit other websites, you are encouraged to read the website owner's policy regarding personal data protection, as well as other relevant policies.

#### Types of personal data

When you visit or interact with our profile on LinkedIn, LOWENCO may, in collaboration with LinkedIn, collect, process and store the following types of personal data for you:

- Information that is available on your profile, including your name and your town/city
- If you 'like' our profile or react in other ways to our profile
- Comments you leave on our posts
- That you have visited our profile

LinkedIn also uses statistical tools on our profile to collect statistical information about visitors' to the page and their behaviour, including age, sex, relationship status, work, lifestyle, areas of interest, information about purchases and geographical information. To this end, LinkedIn will have stored cookies on your device whenever you have visited LinkedIn. Each cookie contains a unique ID code, which remains active for a period of two years, unless the cookie is deleted before then. LinkedIn receives, saves and processes your personal data via these cookies. For more about LinkedIn's use of cookies on LinkedIn, please click the following link to go to LinkedIn's cookie policy:

<https://dk.linkedin.com/legal/cookie-policy>.

#### Processing purposes

Your personal data is processed by LOWENCO for the following purposes:

- Improvement of our products and services
- Improvement of our profile on LinkedIn
- Statistics and analysis

LinkedIn processes your personal data, etc., for the following purposes:

- Improvement of LinkedIn's advertisement system
- To provide LOWENCO with statistics, which LinkedIn produces in part based on your visit to our profile
- Advertising and customising the activities on the site.

#### Basis for processing

Your personal data is processed by LOWENCO on the following basis:

- *Legitimate interests:* We base the processing of your personal data on our legitimate interests in being able to communicate with and market ourselves to you on our LinkedIn profile, as well as our legitimate interest in improving our products and services (GDPR 6,1,f).

Your personal data is processed by LinkedIn on the following basis:

- *Legitimate interests:* LinkedIn bases the processing of your personal data on LinkedIn's legitimate interests, including LinkedIn's interest in delivering an innovative, individually customised, reliable and profitable service (GDPR 6,1,f).
- *Consent:* LinkedIn requires your consent to process certain personal data; this consent can be withdrawn at any time via LinkedIn's settings (GDPR 6,1,a).

For more information about LinkedIn's legal basis for processing personal data, please refer to LinkedIn's general privacy policy. Click the following link to go to LinkedIn's privacy policy: <https://dk.linkedin.com/legal/privacy-policy>

Please contact LinkedIn directly in the first instance if you wish to exercise your rights. Usually, only LinkedIn will be able to take the necessary steps to accommodate the majority of your requests. If you believe LOWENCO is capable of handling the matter and therefore the correct recipient of a request to exercise your rights, you are welcome to contact us.

If you have a LinkedIn profile, you can update your settings here: <https://www.linkedin.com/psettings/data-privacy/>, and exercise your rights here: [https://www.linkedin.com/help/linkedin/answer/50191?trk=microsites-frontend\\_legal\\_privacy-policy&lang=en](https://www.linkedin.com/help/linkedin/answer/50191?trk=microsites-frontend_legal_privacy-policy&lang=en).

#### Retention period

Comments, likes and posts will not be deleted unless you yourself delete the information or if we discover that it is in breach of our policies or LinkedIn's policies. Other personal data, such as user and click behaviour, will be deleted no more than two years later.

The information may be retained for a longer time in an anonymised form, however.

Please refer also to LinkedIn's general privacy policy for more information about how they store and delete your personal data.



## 7. If you are a shareholder or investor

This section outlines LOWENCO's processing of personal data about shareholders and investors in LOWENCO.

### Collection of personal data

LOWENCO may collect, process and store your personal data in the following cases:

- When you become a shareholder or investor in LOWENCO
- When you exercise your rights as a shareholder or investor, including when you participate at meetings, etc.
- When you communicate with LOWENCO

### Types of personal data

LOWENCO may collect, process and store the following types of personal data about you:

- Name, email address, telephone number and corresponding contact details
- Contractual information such as contracts and other agreements between you and LOWENCO
- Information about your shareholder or investor relationship with LOWENCO, including financial information such as bank details, investment amount or shareholding, voting rights and other powers in connection with your relationship with LOWENCO.
- Communication with you

### Processing purposes

Your personal data may be processed for the following purposes:

- Administration, including of your shareholding or the agreement with you as an investor
- Communication with you
- Compliance with current legislation, e.g., fulfilment of our obligations to prevent unlawful activities

### Basis for processing

Your personal data is primarily processed by LOWENCO on one or more of the following bases:

- *Contractual obligations:* In certain cases, the processing of your personal data will be necessary to make fulfilment of a contract with you possible (GDPR 6,1,b).
- *Legitimate interests:* We may process your personal data against the background of our legitimate interests in, for example, being able to communicate with you. This processing may also be necessary for our legitimate interests in preventing fraud or establishing, defending or asserting legal claims (GDPR 6,1,f).
- *Legal obligation:* The processing of your personal data will, in some cases, be necessary in order to meet certain legal obligations, e.g. our obligation to prevent unlawful activities or report significant holdings for public owner registers (GDPR 6,1,c).

### Retention period

Information pertaining to accounting records is stored for five years from the end of the financial year to which the information relates. Your other personal data will be retained for five years. This information may be retained for longer in an anonymised form, however.

## 8. Forwarding to other data controllers and handover to data processors

To achieve the purpose outlined above, we may grant third parties who are providing relevant services pursuant to a contractual relationship with LOWENCO access to your personal data. Examples of such third parties include IT providers, email providers and suppliers of IT solutions. Processing of personal data by these kinds of service providers will always be in accordance with our instructions set out in existing data processor agreements.

As LOWENCO evolves, the company structure may change, e.g., through sale of part or all of the company. In the event of a partial transfer of assets containing personal data, the basis for processing and starting point for the forwarding of personal data associated with this is GDPR 6,1,f. This is because LOWENCO has a legitimate interest in handing over parts of assets and making commercial changes.

Beyond what is outlined above, your personal data will generally not be forwarded to a third party unless you have given your consent to this. In certain circumstances and pursuant to certain legislation, however, it may be necessary to forward your personal data to the following:

- The police
- Lawyers
- Accountants
- Courts
- Public authorities
- Prospective buyers

If your personal data is ever transferred to data processors or data controllers established in countries outside of the EU/EEA who do not have a sufficient level of protection, the EU Commission's standard contracts will be used as the basis for the transfer.

## 9. Your rights

- You are entitled to know which personal data we process for you
- You are entitled to object to our collection and further processing of your personal data
- You are entitled to have your personal data corrected and deleted, with certain statutory exceptions, e.g., the Danish Book-keeping Act
- You are entitled to request that we restrict the processing of your personal data
- Under certain circumstances, you may also request a copy of your personal data and transmission of the personal data you have submitted to us to a different data controller (data portability)
- You may at any time withdraw any consent you have given. After this point, we will delete your personal data, unless there is another basis on which we can continue the processing. You can unsubscribe from our newsletter by clicking the link at the bottom of the newsletter.

## 10. Questions and complaints

If you have any questions about this privacy policy or you wish to complain about the way in which we are processing your personal data, you are welcome to contact us:

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LOWENCO A/S

Address: Bavnevej 10, 6580

Vamdrup, Denmark Email:

info@lowenco.com Telephone

number: +45 3840 0300

If we cannot resolve your complaint, and you wish to pursue the matter further, you may lodge a complaint with the Danish Data Protection Authority:

Danish Data Protection Authority (Datatilsynet)

Carl Jacobsens Vej

35, 2500 Valby,

Denmark

Telephone: +45 3319 3200

Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

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Version	Approved	Changes
1.0	17/09/21-Søren Maarssø	Implemented on website and archived in ISO drive