

## Privacy Notice for Deloitte Private Clients

Version: 28 September 2018

### Privacy Notice for private clients of Deloitte Pension Management Brokers P/S

In connection with your contractual relationship with Deloitte, Deloitte will, as a data controller, collect and process personal data of data subjects for the purposes specified below. Deloitte processes personal data in accordance with the principles in EU General Data Protection Regulation (GDPR). We kindly refer to our Privacy Policy.

Please find an overview of this policy below:

#### Topics:

1. Which data do we collect about you and for which purposes?
2. From whom do we collect your personal data?
3. The legal basis for the collection and processing of your personal data
4. Whom do we share your personal data and why?
5. To whom do we transfer your personal data to?
6. How long do we store your data?
7. Your rights
8. Contact
9. Revision of our Privacy Notice

#### 1. Which data do we collect about you and for which purposes?

We may collect and process the following types of personal data for the purposes of delivery services to you and for the purposes of compliance with applicable legal or regulatory requirements and/or internal policies, documentation requirements, handling of inspections and queries by supervisory authorities, external auditors and legal advisors:

- Your name, age, date of birth, civil identification number (CPR number), gender, phone number, home address, country of residence; passport; visa; family circumstances (e.g. civil status and contact details on dependents) and close relatives, photo, email address, title, employee identification number, employment and education details (e.g. previous employment and education details), salary and pension information; leaves of absence; bank account details, tax-related information, and investments.

We may also collect the following types of particular personal data for the purposes specified above:

- Trade union membership
- Health status data

## **2. From whom do we collect your personal data?**

We collect your personal data from you as well as from public authorities, pension companies, insurance provider, banks, legal and other third party advisors, and other Deloitte entities depending on the nature of engagement.

## **3. The legal basis for the collection and processing of your personal data**

We collect and process your data based on the following articles of GDPR:

- Art. 6.1 (a) consent from you
- Art. 6 paragraph 1 (b) performance of obligations towards you according to a contract with you or your employer
- Art. 6 paragraph 1 (c) legal obligation to which Deloitte is subject
- Art. 6 paragraph 1 (f) the legitimate interests of Deloitte.

We process your personal data for performance of a contract with you; or to meet a legal obligation to which Deloitte is subject or pursue our legitimate interest to ensure an effective operation of our business and to be able to deliver a good service to you.

## **4. With whom do we share your personal data and why?**

In connection with one or more purposes outlined above, your personal data may be disclosed to and shared with the following recipients: public authorities, our professional advisors (e.g. auditor and legal advisors), service and IT vendors, and suppliers; other Deloitte entities, or to third parties to which Deloitte under the law is required to deliver your personal data to.

## **5. To whom do we transfer your personal data to?**

### Transfer of personal data to data processors

We may transfer your personal data to insurance and pension companies of you and authorities. We may also transfer your personal data to IT providers (hosting), including cloud service hosting providers, or to external service vendors, who process and/or store the personal data on our behalf.

### Transfer of personal data to recipients in countries outside the EU/EEA

We may transfer your personal data to recipients located in countries outside the EU/EEA for the purposes listed in section 1. In such case, the legal basis for the international transfer is either EU Model Clause Agreement, the U.S. Privacy Shield Certification, or Deloitte's Binding Corporate Rules when applicable.

## **6. How long do we store your data?**

We store the personal data for as long as necessary to fulfil the purposes above, however, for no longer than necessary for the purposes, and to meet legal requirements.

## 7. Your rights

Subject to the conditions set out in the applicable data protection legislation, the data subject enjoys the following rights:

- The right to request access to your personal data
- The right to rectify of your personal data
- The right to erase of your personal data
- The right to restrict of processing of your personal data
- The right to data portability
- The right to objection to the processing of your personal data

Please note that these rights are not absolute, as they should be balanced against legal requirements and Deloitte's legitimate interest.

You also have the right to lodge a complaint with the qualified supervisory authority: the Danish Data Protection Agency:

Address details:

Datatilsynet  
Borgergade 28, 5  
1300 Copenhagen K  
Denmark

Telephone: + 45 33 19 32 00  
dt@datatilsynet.dk

## 8. Contact

Please contact us at [dkdatabeskyttelse@deloitte.dk](mailto:dkdatabeskyttelse@deloitte.dk) if you have any questions in regard to the protection of your personal data or if you wish to exercise your legal rights.

Address details:

Deloitte Pension Management Brokers P/S  
Weidekampsgade 6  
2300 Copenhagen S  
Denmark

## 9. Revision of our privacy notice

We keep our Privacy Notice under regular review, and thus the Notice may be subject to changes. The date of the last revision of the Privacy Notice can be found on the top of the page.