

## **Privacy Policy**

### **DYKON A/S**

Kongsbjerg 15

6640 Lunderskov

Denmark

CVR no.: 19778983

This is version 2, last updated on 28.10.2024 11:24.

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### **1. Introduction**

**1.1** In this privacy policy (“the Policy”), it is described how DYKON A/S (“us”, “we” or “our”), in the role as data controller, collects and processes your personal data in connection with the purchase of services, membership, products or general use of our website.

**1.2** The Policy is prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (“GDPR”) and the rules therein regarding the duty to provide information.

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## **2. Types of personal data processed**

**2.1** We process personal data about you when this is relevant and in accordance with applicable legislation. Depending on the specific circumstances, the processed personal data may include the following types of personal data:

- a) name
- b) address
- c) telephone number
- d) e-mail
- e) purchase history
- f) billing and accounting documents
- g) account status (balance, customer points, etc.)
- h) customer number
- i) IP address
- j) password
- k) username

**2.2** If we need to collect and process additional personal data beyond what is stated above, we will inform you at the time of collection. Such information may also be provided by updating this Policy.

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## **3. Purpose of processing of personal data**

**3.1** We only process your personal data if we have a legitimate purpose and in accordance with the rules in the GDPR. Depending on the circumstances, personal data may be processed for the following purposes:

- a) To deliver or offer services or products to users, customers or members.
  - b) To store personal data to the extent required under applicable legislation, for example storage of accounting and bookkeeping documentation.
  - c) To provide support and service messages, including responding to questions or complaints and sending updates about our products and services.
  - d) To improve our products, services or website.
  - e) To send direct marketing to users, customers or members (such as e-mails, MMS, direct messages on social media, etc.).
  - f) To administer a customer club or membership with us.
  - g) To respond to enquiries and/or complaints from users, customers or members.
  - h) To send newsletters via e-mail.
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## **4. Legal basis for processing of personal data**

**4.1** We only process your personal data when we have a lawful basis for processing in accordance with the GDPR. Depending on the circumstances, the processing of personal data takes place on the basis of the following legal grounds:

- a) The processing is necessary for the performance of a contract with the data subject, cf. GDPR, Article 6(1)(b), first sentence.
  - b) The processing is necessary for compliance with a legal obligation, cf. GDPR, Article 6(1)(c).
  - c) The processing is necessary for the purposes of legitimate interests pursued, where the interests or fundamental rights and freedoms of the data subject requiring protection of personal data do not override those interests, cf. GDPR, Article 6(1)(f).
  - d) The processing is necessary for the performance of measures taken at the request of the data subject prior to entering into a contract, cf. GDPR, Article 6(1)(b), last sentence.
  - e) The basis for the processing of specific personal data is your consent, cf. GDPR, Article 6(1)(a). You may withdraw your consent at any time by contacting us using the contact details provided at the bottom of this Policy. If you withdraw your consent, the personal data processed on the basis of consent will be deleted, unless it can or must be processed, for example to comply with a legal obligation.
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**4.2** In addition to the above, we carry out analysis of personal preferences, behaviour and attitudes by means of profiling with subsequent direct targeting (e.g. advertisements). Before carrying out such processing, we obtain your consent, unless the analysis is carried out on the basis of specific legal authority in an EU Member State. We carry out such analysis for the following purpose: DYKON will target campaigns and other relevant material to the consumer, with the aim of increasing awareness of DYKON's products.

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**4.3** If we send direct marketing to you, including via e-mail, we will request your prior consent in accordance with the applicable rules in the Danish Marketing Practices Act.

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## **5. Disclosure and transfer of personal data**

**5.1** We only disclose personal data to others when permitted or required by law, including when relevant and upon your and/or the data controller's specific request.

**5.2** We disclose personal data to the following recipients within the EU/EEA:

- a) Data processors
- b) Business partners

**5.3** We generally use various external and professional organisations as suppliers and partners to deliver or assist us in delivering our services and products. These external organisations will not receive or process personal data unless legislation permits such

transfer and processing. If the external organisations or partners act as data processors on our behalf, their processing of personal data will always take place in accordance with a data processing agreement that meets legal requirements. If they act as independent data controllers, their processing will take place in accordance with their own privacy or data protection policies, which they will inform you about, unless otherwise required by law.

**5.4** We do not transfer personal data to countries or international organisations outside the EU/EEA, unless this is necessary at your specific request.

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## **6. Deletion and retention of personal data**

**6.1** We ensure that personal data is deleted when it is no longer relevant for our processing purposes as described above. We always retain personal data for the period required by applicable legislation, including for documentation of compliance with, among other things, the Danish Bookkeeping Act. If you have questions regarding storage and processing, you are welcome to contact us at the e-mail address provided in the final section of this Policy.

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## **7. Your rights**

**7.1** As a data subject, you have a number of rights:

**7.1.1** You have the right to request access to the personal data we process about you, the purpose of processing, and whether we disclose the data to others.

**7.1.2** You have the right to have incorrect personal data about you rectified.

**7.1.3** In certain cases, you have the right to have certain personal data deleted.

**7.1.4** In certain cases, you have the right to restrict the processing of your personal data so that we only store your data for a given period.

**7.1.5** In certain cases, you have the right to object to our processing of your personal data on grounds relating to your particular situation.

**7.1.6** You have the right not to be subject to a decision based solely on automated processing without human intervention, unless the decision is necessary for your employment with us, or is authorised by law or your explicit consent.

**7.1.7** Where we have obtained your consent for part of the processing of your personal data, you have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

**7.1.8** In certain cases, you have the right to data portability of the personal data you have provided to us.

**7.1.9** You may always lodge a complaint with the Danish Data Protection Agency.

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**7.2** There may be conditions or limitations to these rights. Therefore, it is not certain that you have, for example, the right to data portability in a given case – this depends on the specific circumstances of the processing activities.

**7.3** You can find more information about your rights on the website of the Danish Data Protection Agency.

**7.4** Please use the contact details below if you wish to exercise your rights.

**7.5** We strive to accommodate your requests regarding our processing of personal data, but you may always lodge a complaint with the Danish Data Protection Agency.

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## **8. Changes to this policy**

**8.1** We reserve the right to update and amend this Policy. If we change the Policy, we will update the date and version at the top of the document. In the event of material changes, we will notify you by means of a visible notice on our website, by e-mail or by other communication channels.

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## **9. Contact information**

**9.1** You are welcome to contact us at the e-mail address below if you:

- a) disagree with our processing or believe that our processing of your personal data violates the law
- b) have questions or comments regarding this Policy, or
- c) wish to exercise one or more of your rights as a data subject

For questions or comments regarding this Policy, or to exercise your rights, please contact us at:

**gdpr@dykon.dk**