

## DATA PROTECTION POLICY FOR DANISH PEOPLE'S AID.

### 1. GENERAL

1.1 This Data Protection policy (the "Policy") applies to all information that you disclose to us, and/or that we collect regarding you, either as an element of a member/volunteer/customer/ partner or donator relationship, as a user of our services or including by using our website. Here, you can read about the data we collect, how we process it and for how long we retain your data. You should read this Policy and contact us if there is any information in this Policy about which you have questions or cannot accept. The current version of the Policy will always be available on [www.folkehjaelp.dk](http://www.folkehjaelp.dk).

### 2. DATA CONTROLLER

2.1 The Data Controller organization for the processing of your Personal Data is:

Danish People's Aid  
Brovejen 4  
DK-4700 Nykøbing Falster  
Tel. no.: +45 70 220 230  
[post@folkehjaelp.dk](mailto:post@folkehjaelp.dk)  
CVR no.: 20553413

(Hereinafter referred to as the "Organization")

2.2 The overall legal framework for our processing of Personal Data is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC with related regulation. In addition, a new Danish Data Protection Act has been adopted - Act No. 502 of 23 May 2018 supplementary provisions to the Regulation on the Protection of Individuals with regard to the Processing of Personal Data and on the Free Exchange of Such Information (Data Protection Act).

2.3 Any questions concerning this Policy, the processing of your data and any suspected breach should be addressed to Secretary General Klaus Nørlem, Danish People's Aid ([kn@folkehjaelp.dk](mailto:kn@folkehjaelp.dk)).

### 3. DEFINITIONS

3.1 Below are definitions of some of the most important legal terms concerning Personal Data:

#### **Personal Data**

Any form of information concerning an identified or identifiable natural person. This means all information that directly or indirectly, alone or in combination, may identify a specific natural person.

#### **Data Controller**

The natural or legal person, public authority, institution or other body that alone, or together with others, determines the purpose and by which means Personal Data may be processed.

#### **Data Processor**

The natural or legal person, public authority, institution or other body that processes Personal Data on behalf of the Data Controller.

## **Processing**

Any activity or series of activities involving the use of Personal Data, such as fundraising, registration, systematization, changes, searches, compilation, transfer or disclosure to persons, authorities, companies, etc. outside the organization.

## **Special Categories of Personal Data**

Information concerning racial or ethnic origin, political opinions, religion or beliefs, trade union membership, genetic data or health status, or information concerning a natural person's sex life or sexual orientation, and information in the form of biometric data, if the biometric data is processed for the purpose of unique identification of a natural person (sensitive Personal Data).

## **General Data Protection Regulation**

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC with related regulation.

## **Danish Data Protection Act**

Act No. 502 of 23 May 2018 with supplementary provisions to the Regulation on the Protection of Individuals with regard to the Processing of Personal Data and on the Free Exchange of Such Information (Data Protection Act).

## **4. PURPOSE OF PROCESSING YOUR PERSONAL DATA**

4.1 Regardless of whether you are a member, customer, volunteer for our activities, a donor, user of our services/aid etc. or just a user of our websites, we process your Personal Data to ensure you the best possible services, and fulfil our obligations as Danish People's Aid. This applies to handling any donations that you may make - unless you choose to donate anonymously - and any purchases you make of services or items from us, using our services/aid, when we administrate any subscriptions you may hold, and/or your memberships, or as a partner. This may also be as a volunteer or in communication with our reception or other parts of the administration, and/or in conjunction with marketing initiatives directed towards you. The policy also takes effect when you apply for a job in Danish People's Aid via our recruitment system, or when you are in a current employment relationship. In every case in which we collect Personal Data about you, we will inform you of the purpose of processing your Personal Data.

## **5. YOUR PERSONAL DATA THAT WE PROCESS**

5.1 We collect this data from you directly:

5.1.1 When you are a member, volunteer, customer or donator, partner or user of our services/aid, we may collect the following ordinary Personal Data from you: Name, address, zip code, town/city, mobile number, e-mail address, and bank registration and account number depending on your relationship with us.

We too collect CPR- number (personal identification number) depending on the relationship with us.

5.1.2 When you visit our website, and contribute to our work, we also use Cookies.

5.1.3 In principle, we do not collect any Special Categories of Personal Data (sensitive data) about you, but in cases where we require this, e.g. in conjunction with employment, we can request details of health status.

5.1.4 We collect the following ordinary Personal Data in order to gain new members for Danish People's Aid: name, address, zip code, town/city and telephone number and CPR-number.

5.2 Personal Data may be collected about you from other parties. This may include:

5.2.1 Personal Data from former employers in conjunction with references.

5.2.2 Criminal Record and/or Child Protection Certificate

## 6. COOKIES

On our website, "cookies" are used, e.g. for web-statistical purposes, to see how many people visit our website, and how they use the website. We also use this to measure ads on other sites based on visits to our site (Google Remarketing). A cookie is a small text file that is sent from our server to your browser, and is stored on your computer's hard disk or your mobile device. Cookies enable you to use the website more effectively and easily. We do not process information concerning user behavior that is collected via cookies in any way that may link user behavior with specific persons. You can set your browser to inform you when you receive a cookie, so that you can always decide whether you wish to accept it. You can also turn off the function completely in your browser. If you do this, the website will not function optimally, however. Cookies do not contain Personal Data such as details of your e-mail address or other Personal Data than as specified in this Policy.

## 7. HOW WE PROCESS YOUR PERSONAL DATA

7.1 In concrete terms, we use your Personal Data for several different purposes, depending on whether you are a member, volunteer, partner, job applicant, donor or a user of Danish People's Aid's services/aid and website.

7.1.1 If you are a member, volunteer or partner we use your Personal Data to be able to:

- administrate your relationship with us
- send you the necessary information about your membership etc.
- send you marketing material, provided that this is also in accordance with the Danish or local Marketing Act in force at any time and newsletters.

7.1.2 If you are a customer, we use your Personal Data to be able to:

- make functionalities on our website, available to you
- send you order confirmations
- respond to any questions and fulfil your requests
- handle administration of our relationship with you
- send you marketing material, provided that this is in accordance with the Danish Marketing Act in force at any time and newsletters.

7.1.3 If you are a donator, we use your Personal Data to be able to:

- administrate your payment(s)
- send you the necessary information about your donation(s)
- report your donation to SKAT (the Danish tax authorities), so that your donation will be shown on your tax return (only applies if you pay tax in Denmark)
- send you marketing material, provided that this is also in accordance with the Danish Marketing Act in force at any time and newsletters.

7.1.4 If you are an applicant for a job with us, we use your Personal Data to be able to:

- make a qualified assessment of your application
- contact you
- request references, if necessary.

7.1.5 If you attend one of our events or using our services/aid, we use your Personal Data to be able to:

- administrate your relation to an event/aid/services
- send a receipt for your registration for an event/aid/services
- be able to send you material concerning the event and newsletters

7.1.6 If you are solely a user of our website, we use your Personal Data to be able to:

- make functionalities on our website available for you to use
- prepare statistics concerning your browsing of our website
- optimise our website's design

## **8. WHY ARE WE PERMITTED TO PROCESS DATA CONCERNING YOU (BASIS FOR PROCESSING)?**

8.1 When you use our services/aid, become a member/volunteer, make a donation or enter into any other type of agreement with us, we will process your ordinary Personal Data for this specific purpose. We may also process your ordinary Personal Data in situations where you e.g. have made an enquiry or similar prior to your decision to enter into an agreement with us. The legal basis for processing your Personal Data is Article 6(1) (b) of the General Data Protection Regulation, since the processing of your data is necessary for the performance of our agreement with you, or for us to handle enquiries and similar prior to any agreement which you make with us.

8.2 We can also process your ordinary Personal Data because we have a legitimate interest in processing the data concerning you, cf. Article 6(1) (f) of the General Data Protection Regulation, unless our legitimate interest in processing your data is overridden by your right to protection of your own ordinary Personal Data.

8.3 We have a legitimate interest in processing your Personal Data (your name and e-mail address) for marketing purposes. Our legitimate interest thus concerns knowing your preferences, so that we can better match our offers to you, and ultimately offer products and services that better fulfil your needs and requirements. We naturally also observe the rules laid down in the relevant Marketing Act. It is also with reference to this provision that we prepare various statistics for the number of members, donations, use of our website, etc.

8.4 In certain cases, we are also legally obliged to process Personal Data concerning you. This might be to use for the documentation of transaction tracking and similar, as laid down in the rules in the Danish Bookkeeping Act. Among other things, we must save accounting documents for five years from the end of the financial year which the material concerns, or saving for ten years according to EU-regulation. This may also be in conjunction with declarations to SKAT (the Danish tax authorities) (6.1 c.) so that your donations to us can be deducted on your tax return. Declarations to SKAT must be made stating your CPR number, cf. the Danish Tax Control Act, which is therefore the basis for our processing of data concerning your CPR number.

8.5 As a charitable organization, cf. Section 8 A of the Danish Tax Assessment Act, we are permitted to contact persons in order to enter into agreements concerning membership of our organization cf. Part 1, Section 1(2), Section 8 and Section 11(3) of the Danish Collection Act.

8.6 We too process Personal Data based on consent, cf. article 6 (1) (a) and article 9 (2) (a) of the General Data Protection Regulation, when you apply our services/aid, being a member, acting as volunteer and applying some jobs. Consent means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

8.7 If you are not a customer, member, volunteer, partner or donator etc., but e.g. solely a user of our website, we have a - limited - need to be able to administrate the information you provide, in order to e.g. manage cookies. In some cases, we can register which IP addresses have accessed our website. An IP address may be Personal Data, and if we process your IP address, this will take place on the same basis as described above under clause 8.2.

## **9. SHARING YOUR PERSONAL DATA**

9.1 We may share your Personal Data with the suppliers and partners that assist us with the execution of your order, or who assist us with our IT operations, hosting, etc. This means that we may share your data with e.g. our service providers, technical support, recruitment partners etc.

9.2 We may also share your data with our local branches to the extent that this is legal. This takes place within the framework of Danish People's Aid collaboration.

9.3 In addition to the aforementioned, we share your data to the extent that we are obliged to do so, e.g. as a consequence of requirements to report to public authorities such as SKAT.

## 10. STORAGE AND ERASURE OF YOUR PERSONAL DATA

10.1 We store your Personal Data according to the following rules:

10.2 If you are a member/volunteer or donator, partner, customer etc. we will store your Personal Data while you are associated with our organization, and for up to five years after the current year, as from your most recent donation, in accordance with the Danish Bookkeeping Act or for up to five years after the relationship ended. Personal Data concerning bank, reg. no. and account number is at least stored in 13 months after your payment service agreement with NETS has been cancelled, cf. the Danish Payment Service Act of 2009, which requires the Danish People's Aid to be able to document for up to 13 months after the expiry of the agreement that an agreement has been entered into.

10.3 If you are a job applicant, we will retain your Personal Data for up to six months from your latest application date.

10.4 If you are applicant to our social aid services we store your Personal Data for up to three years.

## 11. YOUR RIGHTS

11.1.1 You have a right of access to the Personal Data concerning you, which we process. You can write to us at [post@folkehjaelp.dk](mailto:post@folkehjaelp.dk) to request access to the Personal Data that we have registered concerning you, including the purposes for which the data has been collected. We will accommodate your request for access as soon as possible.

### 11.2 Rectification and deletion

11.2.1 You are entitled to request correction, supplementary processing, deletion or blocking of the Personal Data that we process concerning you. We will accommodate your request as soon as possible, to the necessary extent. If we are unable to meet your request - for any reason - we will contact you.

### 11.3 Limitation of processing

11.3.1 In special circumstances, you have the right to limit the processing of your Personal Data. Please contact us at [post@folkehjaelp.dk](mailto:post@folkehjaelp.dk) if you wish to limit the processing of your Personal Data.

### 11.4 Data portability

11.4.1 You have the right to receive your Personal Data (only data concerning yourself, which you have given us yourself) in a structured, generally used and machine-readable format (data portability). Please contact us at [post@folkehjaelp.dk](mailto:post@folkehjaelp.dk) if you wish to use the opportunity for data portability.

### 11.5 Right to object

11.5.1 You are entitled to ask us not to process your Personal Data in cases where the processing is based on Article 6(1) (e) (a task carried out in the public interest or in the exercise of official authority vested in the controller) or Article 6(1) (f) (legitimate interests). This Policy states the extent to which we process your data for such purposes. You may contact us at [post@folkehjaelp.dk](mailto:post@folkehjaelp.dk) at any time to exercise your right to object.

### 11.6 Revocation of consent

11.6.1 If the processing of your Personal Data is based on your consent, you are entitled to revoke this consent at any time. Your revocation will not affect the legality of the processing performed before your consent was revoked. Please contact us at [post@folkehjaelp.dk](mailto:post@folkehjaelp.dk) if you wish to revoke your consent.

11.6.2 If you wish to revoke your consent to receive sales promotion information and offers in general, including by ordinary mail, e-mail, via text message, by telephone or by other electronic means, you can do this at any time by writing to [post@folkehjaelp.dk](mailto:post@folkehjaelp.dk). If we are in any doubt concerning your identity, we can request you to provide proof of identity. This is free of charge, apart from the ordinary communication costs.

11.7 There may be conditions or limitations concerning the exercising of the aforementioned rights. It is therefore not certain that you are e.g. entitled to data portability in the concrete situation, as this will depend on the particular circumstances for the processing activity in question.

## **12. POSSIBLE CONSEQUENCES OF NOT PROVIDING PERSONAL DATA**

12.1 If you are obliged to provide us with your Personal Data, this will be stated when we collect such data. In some cases, this will be a statutory or contractual requirement, cf. Article 13(2) (e) of the General Data Protection Regulation.

If you do not wish to provide the Personal Data that we request, this may have the consequence that we will be unable to deliver the required services to you, or to complete your orders, create you as a donor, report your donations to SKAT, etc.

## **13. SECURITY**

13.1 In our organization, our processing of Personal Data is subject to our IT and Security Policy. We have implemented internal rules and procedures to maintain adequate security as from the time when we collect Personal Data up to its erasure, just as we solely assign our processing of Personal Data to Data Processors that maintain an equivalent adequate security level.

## **14. COMPLAINTS TO THE SUPERVISORY AUTHORITY**

14.1 If you wish to complain about our processing of Personal Data, you may direct this to the Danish Data Protection Agency.

Data Protection Agency, Borgergade 28, 5th floor, DK-1300 Copenhagen K., Phone: +45 33 19 32 00  
E-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

## **15. UPDATING OF THIS POLICY**

15.1 Danish People's Aid is committed to complying with the fundamental principles for the protection of Personal Data and data protection. We therefore regularly review this Policy in order to keep it updated and in accordance with current principles and legislation. This Policy may be amended without notice. Significant amendments to the Policy will be published on our website, together with an updated edition of the Policy.

15.2 Any future amendments made to this Policy will be published on this page and may be notified to you by e-mail.

This Policy was most recently updated on 2. April 2019.