

## Privacy policy

Codan Forsikring A/S ("we") is the data controller with respect to any data we process about you.

Processing your personal data in a secure and proper manner is a focus area for us. We ensure this among other things by complying with the provisions of data protection legislation, including in particular the provisions of the EU General Data Protection Regulation ("GDPR") and the Danish Data Protection Act, adhering to the practices outlined by the Danish Data Protection Agency and complying with sector-specific rules, including the Danish Insurance Business Act.

The purpose of this privacy policy is to inform you about how we process, protect and in certain circumstances disclose your personal data, which rights you have and how you may exercise those rights.

This privacy policy applies if you receive offers for insurance and if you are or have been a customer with us. The policy also applies if you have been in contact with us for other reasons, for example if you are a party to a pending claim, if you are co-insured, if you receive our marketing materials or visit our website.

### When do we process your personal data?

#### We process your personal data for these purposes:

1. When we make you an insurance offer
2. When we manage your customer relationship
3. When we process your claim
4. When we carry out profiling and use automated decision-making
5. When we market our products
6. When we use cookies
7. When we develop our business
8. When we record telephone conversations
9. When you visit our locations

### 1. When we make you an insurance offer

When you request an insurance offer, we collect a variety of personal data about you. The purpose of collecting such data is to identify your needs, provide advice and draw up an offer for one or more insurances based on your data. We also process your personal data in order to carry out administrative tasks, such as calculating any discounts and performing risk and quality management.

#### Which categories of personal data do we process?

- contact details, for example address, name, telephone number and e-mail address;
- date of birth and civil registration (CPR) number;
- information about address and/or advertising protection;
- offer, policy and customer numbers;
- payment information, for example how often and how you pay your insurances;
- insurance information about you or the item insured, for example additional insurances, persons in your household, previous insurance claims, occupation, motor vehicle registration number, information about real estate and information about the price of your insurances;
- information about payouts, for example amounts due;
- information about any entries in registers of debtors or the Danish Motor Insurers' Bureau (DFIM);
- information about affiliation with our business partners if an insurance offer is provided through a business partner or other group insurance contracts;

- trade union membership;
- health information.

#### **Special information for corporate customers**

- the controlling shareholders;
- information about the company's beneficial owners;
- company registration (CVR) number.

#### **Our basis for processing your personal data**

- We need to process and possibly disclose personal data in order to draw up, enter into and perform the insurance contract (article 6(1)(b), of the GDPR).
- We need to process and possibly disclose personal data in order to comply with our legal obligations under e.g. financial legislation, including our obligation to identify insurance requirements and needs, and to comply with our obligations under other financial regulation (article 6(1)(c), of the GDPR).
- In certain circumstances, we need to process and possibly disclose personal data about other persons when we draw up an insurance offer, as we have a legitimate interest in processing necessary information about e.g. party representatives (article 6(1)(f), of the GDPR).
- If you have provided your civil registration (CPR) number for purposes of us drawing up an insurance offer for you, our processing will be based on your consent (article 6(1)(a), of the GDPR and section 11(2)(i) of the Data Protection Act, cf. section 69 of the Insurance Business Act).
- We need to process sensitive personal data in the form of trade union membership if you purchase insurances through your trade union in order that we may calculate any discounts (article 9(2)(a) or (f), of the GDPR and article 6(1)(f), of the GDPR).
- We need to process and possibly disclose information about any entries in the Danish Motor Insurers' Bureau when we draw up an insurance offer, as we are not permitted to establish an insurance on a motor vehicle if the owner or user owes the Danish Motor Insurers' Bureau any daily fees (section 8(3), second sentence, of the Data Protection Act, cf. article 10 of the GDPR).
- We need to process your health information when you take out an insurance which covers illness for children based on your explicit consent (article 9(2)(a), of the GDPR, cf. article 6(1)(a), of the GDPR).

#### **From whom do we collect personal data?**

We collect personal data in various ways and from multiple sources, depending on the insurances included in our offer and your consents. When we request information directly from you, it is up to you whether you wish to provide the information requested. If you do not provide the information, we may not be able to draw up an accurate insurance offer.

#### **We may collect personal data from these sources:**

- you (policyholder);
- the Danish Civil Registration System (validation of address);
- the Danish Central Business Register;
- the Danish Building and Housing Register (building data);
- the Danish Register of Motor Vehicles (vehicle data);
- business partners;
- your lawyer, contact person or other party representative authorised by you;
- publicly available sources: the title register of vehicles, the land register, OIS.dk, the Danish Agency for Data Supply and Infrastructure (oblique aerial photos) (*SDFI Skråfoto*);
- auditors;
- other insurance companies.

## **To whom do we disclose personal data?**

We will only disclose such information as is relevant and necessary for us to draw up an offer for your insurances. Any disclosure of such information will take place on the basis of processing described in the section "Our basis for processing your personal data" above.

We may disclose personal data to:

- other insurance companies;
- business partners;
- the Danish Customs and Tax Administration;
- the Danish Register of Motor Vehicles.

## **When and for how long do we store your personal data?**

Unless otherwise agreed in the offer, we will automatically erase your insurance offer and the data we have collected about you if you have not accepted the offer and are not a customer with us 60 days after the end of the month in which the offer should have become effective.

## **2. When we manage your customer relationship**

We process your personal data when we manage your customer relationship. The purpose of our processing is to maintain and manage your insurances, for example by calculating any discounts, adjusting payments, performing risk and quality management and developing our business.

### **Which categories of personal data do we process?**

- contact details, for example address, name, telephone number and e-mail address;
- date of birth and civil registration (CPR) number;
- company registration (CVR) number;
- information about address and/or advertising protection;
- offer, policy and customer numbers;
- payment information, for example how often and how you pay your insurances;
- insurance information about you or the item insured, for example relations, including persons in your household, additional insurances, insurance claims, occupation, motor vehicle registration number, information about real estate and information about the price of your insurances;
- information about payouts, for example amounts due;
- information about any entries in registers of debtors or the Danish Motor Insurers' Bureau;
- information about affiliation with our business partners if an insurance offer is purchased through a business partner or other group insurance contracts;
- trade union membership.

### **Our basis for processing your personal data**

- We need to process personal data in order to perform the insurance contract (article 6(1)(b), of the GDPR).
- We need to process your civil registration (CPR) number in order to uniquely identify you (section 11(2)(i) of the Data Protection Act, cf. section 69 of the Insurance Business Act).
- We need to process your civil registration (CPR) number in order to comply with a legal requirement, for example under financial legislation (article 6(1)(c), of the GDPR and section 11(2)(i) of the Data Protection Act).
- We need to process and possibly disclose personal data in order to comply with our legal obligations, for example under financial legislation, including the Insurance Contracts Act (article 6(1)(c), of the GDPR).
- In certain circumstances, we need to process and possibly disclose personal data about other persons in connection with managing your customer relationship, as we have a legitimate interest in processing necessary information about e.g. party representatives (article 6(1)(f), of the GDPR).

- In certain circumstances, we need to process and disclose personal data to our business partners, as – for existing customers – we have a legitimate interest in regularly settling commission for each individual customer in our business partnerships (article 6(1)(f), of the GDPR).
- We need to process sensitive personal data in the form of trade union membership if you purchase insurances through your trade union in order that we may establish and manage your customer relationship and calculate any discounts (article 9(2)(a) or (f), of the GDPR and article 6(1)(f), of the GDPR).
- We need to process and possibly disclose information about any entries in the Danish Motor Insurers' Bureau when we manage your customer relationship, as we have a legal obligation to disclose, at the request of the Danish Motor Insurers' Bureau, information about uninsured motor vehicles (section 8(3), second sentence, of the Data Protection Act, cf. article 10 of the GDPR).

### **From whom do we collect personal data?**

We collect personal data in various ways and from multiple sources, depending on your insurance covers and the consents you have given. When we obtain information directly from you, it is up to you whether you wish to provide the information requested. If you do not provide the necessary information, we may not be able to regularly manage your customer relationship and your insurances in an adequate manner.

### **We may collect personal data from these sources:**

- you (policyholder);
- your party representative or contact person;
- the Danish Civil Registration System (updating of address and possibly advertising protection via the Robinson list);
- the Danish Central Business Register;
- the Danish Building and Housing Register (updating of building data);
- the Danish Register of Motor Vehicles (updating of vehicle data);
- the Danish Motor Insurers' Bureau;
- insurance brokers;
- business partners;
- publicly available sources: the title register of vehicles, the land register, OIS.dk, the Danish Agency for Data Supply and Infrastructure (oblique aerial photos);
- the Danish Insurance Complaints Board;
- the courts of law.

### **To whom do we disclose personal data?**

We will only disclose such information as is relevant and necessary for us to manage your insurances. Any disclosure of such information will take place on the basis of processing described in the section "Our basis for processing your personal data" above.

We may disclose personal data to:

- the Danish Motor Insurers' Bureau;
- party representatives;
- business partners based on your specific consent, which must be given separately;
- Mastercard Payment Services (registration and verification of direct debit agreement (*Betalingservice*));
- the Danish Insurance Complaints Board;
- the courts of law.

### **When and for how long do we store your personal data?**

We automatically erase information about your previous insurances six, 11 or 30 years after the insurance has terminated.

### 3. When we process your claim

If you report a claim, we will process your personal data. The purpose is to carry out claims processing and calculate and pay out any damages, and to identify and investigate any cases of insurance fraud.

#### Which categories of personal data do we process?

- contact details, for example address, name, telephone number and e-mail address;
- date of birth and civil registration (CPR) number;
- company registration (CVR) number;
- payment information, for example how often and how you pay your insurances;
- insurance information about you or the item insured, for example relations, including persons in your household, additional insurances, insurance claims, occupation, motor vehicle registration number and information about real estate;
- information about payouts, for example amounts due and damages;
- photos and video recordings of the item damaged;
- information about any entries in registers of debtors;
- information about the item damaged;
- information about the process in connection with the claims event, including claims assessor's report and police report;
- health information, for example illness or accident;
- trade union membership;
- information about pay and financial matters;
- criminal offences.

#### Our basis for processing your personal data

- We need to process personal data in order to perform the insurance contract (article 6(1)(b), of the GDPR).
- We need to process your civil registration (CPR) number in order to uniquely identify you (section 11(2)(i) of the Data Protection Act, cf. section 69 of the Insurance Business Act).
- We need to process and possibly disclose personal data in order to comply with our legal obligations, for example under financial legislation, including the Insurance Contracts Act (article 6(1)(c), of the GDPR).
- In most cases, we need to process and possibly disclose personal data about other persons linked to the insurance and the claim, for example the injured party, the person causing the loss, the opposing party and witnesses, as we have a legitimate interest in adequately processing the claim and making a correct decision as to payment of any damages and investigating suspected insurance fraud (article 6(1)(f), of the GDPR).
- In certain circumstances, we need to process and possibly disclose personal data about other persons when we process a claim, as we have a legitimate interest in processing necessary information about e.g. party representatives or witnesses (article 6(1)(f), of the GDPR).
- We need to process and possibly disclose sensitive personal data in the form of health information and trade union membership in connection with workers' compensation claims (article 9(2)(f), of the GDPR and article 6(1)(b), of the GDPR).
- We need to process and possibly disclose sensitive personal data in the form of health information in connection with claims processing (article 9(2)(f), of the GDPR and article 6(1)(b), of the GDPR).
- We need to process and possibly disclose information about criminal offences in connection with our claims processing, as we have a legitimate interest in processing the claim on an adequate and informed basis so that we may make a correct decision (section 8(3), second sentence, of the Data Protection Act, cf. article 10 of the GDPR).

#### From whom do we collect personal data?

We collect personal data in various ways and from multiple sources, depending on the claims you have reported and the consents you have given. When we obtain information directly from you, it is up to you

whether you wish to provide the information requested. If you do not provide the information requested, we may not be able to adequately process and settle your claim.

We may collect personal data from these sources:

- the policyholder and the insured;
- the injured party;
- the person causing the loss;
- witnesses;
- your party representative or contact person;
- the Danish Civil Registration System (updating of address and possibly advertising protection via the Robinson list);
- the Danish Central Business Register;
- publicly available sources such as the title register of vehicles, the land register and social media;
- healthcare professionals, for example doctors, dentists and physiotherapists;
- the Danish Labour Market Insurance;
- the Danish Labour Market Supplementary Pension Fund;
- the National Social Appeals Board;
- the Danish patient compensation scheme;
- business partners, for example craftsmen, claims assessors and workshops;
- the Danish Insurance Complaints Board;
- public authorities, for example municipalities, the Police, the Danish Customs and Tax Administration and the courts of law;
- other insurance companies.

#### **To whom do we disclose personal data?**

We will only disclose such information as is relevant and necessary for us to process your claim and calculate any claim for damages. Any disclosure of such information will take place on the basis of processing described in the section "Our basis for processing your personal data" above.

We may disclose personal data to:

- the Danish Labour Market Insurance;
- the National Social Appeals Board;
- the Danish Insurance Complaints Board;
- business partners, for example craftsmen, claims assessors and workshops;
- public authorities, for example municipalities, the Police, the Danish Customs and Tax Administration, the National Social Appeals Board, the Danish patient compensation scheme and the courts of law;
- business partners, for example roadside assistance provider SOS Dansk Autohjælp, workshops, claims services companies and external advisers;
- other insurance companies.

#### **When and for how long do we store your personal data?**

We automatically erase information about claims six, 11 or 30 years after the claim has been settled.

## **4. When we carry out profiling and use automated decision-making**

### **Profiling**

Profiling is a form of automated processing of personal data, which involves using personal data to assess certain personal matters about a natural person, mainly to analyse and predict matters relating to the person in question.

When we prepare marketing and targeted communication, we process behaviour and cookie data collected from our website and apps if you have given us your consent. You can learn more about our use of cookies in our cookie policy: <https://www.codan.dk/om-codan/cookies-persondatapolitik-og-vilkaar-for-brug>.

## **Our basis for processing your personal data**

We use profiling among other things:

- to offer insurances that are relevant to you and to determine prices (article 6(1)(b), of the GDPR);
- to investigate potential insurance fraud (article 6(1)(f), of the GDPR);
- when we market our services and target our communications (article 6(1)(f), of the GDPR);
- when we prepare statistics and develop models that may help us, among other things, to assess the risk of customers terminating their insurances and when we prepare profitability calculations and recommend products for you (article 6(1)(f), of the GDPR).

## **Automated decision-making**

We use automated decision-making when we make decisions which are based exclusively on automated processing, including profiling, and which have legal effect for you or in a similar manner have a significant impact on you. These types of decisions are made without any human intervention.

We make automated decisions when we:

- calculate the price of your insurance. The price of your insurance is determined on the basis of your risk profile. Factors which may lead to a higher price could be, for example, if you live in an area where the risk of incurring a claim is higher than in other areas.
- process certain types of claims online. A claim for damages is calculated by comparing the information submitted in connection with the reporting of the claim with covers on the insurance as well as the terms and your customer relationship in general. Based on the assessment of the above-mentioned factors, the automated decision may result in full or partial coverage or refusal of the claim. If the claim cannot be processed by automated means, for example because we need additional information, or because the scope and complexity of the case requires human intervention, the claim will be processed by an employee;
- terminate insurances or remove covers due to non-payment. Termination of an insurance due to non-payment will be based on continuous non-payment over the course of a dunning process, resulting in the non-compulsory covers on the insurance being terminated.

The processes where we use automated decision-making are regularly tested and checked to ensure that the decision is made on a fair, objective and efficient basis.

You are entitled to object to our processing of your personal data for profiling and automated decision-making purposes. The right to object is described in more detail in the section "What are your rights?" below.

## **5. When we market our products**

When we market our insurances and our business partners' products to you, we process your personal data. The purpose of the processing is to target our communications and the marketing of our or our business partners' products.

### **Which categories of personal data do we process?**

- contact details, for example name, address, telephone number and e-mail address;
- date of birth;
- date of and information about address and/or advertising protection;
- insurance categories, for example accident insurance.

## **Our basis for processing your personal data**

- In certain circumstances, we need to process and possibly disclose personal data, as we have a legitimate interest in marketing relevant products and services to you (article 6(1)(f), of the GDPR).
- We process your data if you have consented to us sending you e-mails, text messages, letters or contacting you in any other manner (article 6(1)(a), of the GDPR).

## **From whom do we collect personal data?**

We collect personal data in various ways and from multiple sources, depending on the consents you have given.

We may collect personal data from these sources:

- publicly available registers, for example the telephone directory;
- competitions you have chosen to participate in;
- business partners.

## **To whom do we disclose personal data?**

We will only disclose such information as is relevant and necessary for us to market our and our business partners' products to you. Any disclosure of such information will take place on the basis of processing described in the section "Our basis for processing your personal data" above.

We may disclose personal data to:

- business partners;
- social media, e.g. Facebook and LinkedIn, if you use these services and visit Codan's profiles.

## **When and for how long do we store your personal data?**

If you withdraw your consent to marketing, our processing of your personal data for purposes of marketing insurances to you will cease.

If you notify us that you do not wish to be contacted for marketing purposes, we will erase all information about you unless we are required by law to store such information. However, we will store your telephone number for 12 months with a view to ensuring that you are not contacted again for marketing purposes.

If we have not used your marketing consent, the consent will automatically be erased 24 months after it has been obtained if you are a customer and after 12 months if you are a potential customer.

## **6. When we use cookies**

We process your personal data when you visit our website (codan.dk) if you give your consent. The purpose of our processing is to analyse how our website is being used and to collect information to better target our advertisements to you.

### **Which categories of personal data do we process?**

When you visit our website, we collect information about:

- your cookie ID;
- your IT equipment, for example your computer, tablet or smartphone;
- which websites and subpages you click on and when.

When you visit other websites on which we advertise, we may collect information about you from these websites in order to target our marketing to you. We collect information about:

- your cookie ID;
- which advertisements you have looked at and when.

### **Our basis for processing your personal data**

- We process your personal data when you visit our website where we use necessary cookies, as we have a legitimate interest in making the website fit for use (article 6(1)(f), of the GDPR).
- We process your personal data if you have given us your consent (article 6(1)(a), of the GDPR).



You can learn more about how we use your personal data in our cookie policy, available at <https://www.codan.dk/om-codan/cookies-persondatapolitik-og-vilkaar-for-brug>, which describes, among other things, the purpose of each category, the party setting the relevant cookie, for how long the cookies are stored in your equipment, the type of cookie concerned and a link to the third party's privacy policy.

### **You have the right to withdraw your consent**

When we process your personal data based on your consent, you have the right to withdraw the consent. You can learn more about how to withdraw your consent in our cookie policy:

<https://www.codan.dk/om-codan/cookies-persondatapolitik-og-vilkaar-for-brug>. If you withdraw your consent, some functionality on the website may not be available to you.

Please note that necessary cookies cannot be deselected, as we use these to make the website fit for use. Therefore, we do not process necessary cookies based on your consent.

## **7. When we develop our business**

We process your personal data when we develop our business. The purpose of our processing is to perform customer surveys for business and product development purposes, for example to develop our services, products and systems, to test new solutions and to identify customer needs and improve our services.

### **Which categories of personal data do we process?**

- contact details, for example address, name, telephone number and e-mail address;
- date of birth and civil registration (CPR) number;
- insurance information about you or the item insured, for example current and previous insurances, relations, including persons in your household, insurance claims, occupation, motor vehicle registration number and information about real estate;
- information about payouts, for example amounts due and damages;
- information about group insurance contracts.

### **Our basis for processing your personal data**

- We need to process and possibly disclose personal data, as we have a legitimate interest in developing our business and our products (article 6(1)(f), of the GDPR).
- We need to process and possibly disclose your civil registration (CPR) number in order to uniquely identify you (section 11(2)(i) of the Data Protection Act, cf. section 69 of the Insurance Business Act).

### **From whom do we collect personal data?**

We receive information in various ways and from multiple sources, depending on your insurance covers.

We may collect personal data from these sources:

- you (policyholder);
- the Danish Civil Registration System;
- the Danish Building and Housing Register;
- the Danish Register of Motor Vehicles;
- the Danish Customs and Tax Administration.

### **To whom do we disclose personal data?**

We will only disclose such information as is relevant and necessary for us to adequately test integrations with third-party providers and to develop our products. Any disclosure of such information will take place on the basis of processing described in the section "Our basis for processing your personal data" above.

We may disclose personal data to:

- the Danish Register of Motor Vehicles;
- the Danish Customs and Tax Administration;

- the Danish Insurance Association.

#### **When and how long do we store your personal data?**

We automatically erase information about previous insurances and claims six, 11 or 30 years after the insurance has terminated or the claim has been settled.

## **8. When we record telephone conversations**

We record certain telephone conversations for the purposes of regular documentation of our advisory services and the agreements we make.

#### **Which categories of personal data do we process?**

- contact details, for example name and telephone number;
- date of birth and civil registration (CPR) number;
- offer, policy, customer and claims numbers;
- insurance information about you or the item insured;
- health information, for example illness or accident;
- information about any entries in the Danish Motor Insurers' Bureau.

#### **Our basis for processing your personal data**

- We need to process personal data, as we have a legitimate interest in being able to document how we distribute insurances and comply with financial provisions (article 6(1)(f), of the GDPR).
- We need to process personal data as we have a legitimate interest in being able to document our claims processing and calculate insurance payouts as well as to verify the justification of claims or incidents reported by our customers on their insurances (article 6(1)(f), of the GDPR).
- We need to process your civil registration (CPR) number in order to uniquely identify you (section 11(2)(i) of the Data Protection Act, cf. section 69 of the Insurance Business Act).
- We need to process personal data in order that we may establish, exercise and defend legal claims (article 9(2)(f), of the GDPR and article 6(1)(b), of the GDPR).

#### **When and for how long do we store your personal data?**

When we establish or change insurances, we store recordings of telephone conversations for documentation purposes for a period of five years, after which they will automatically be erased.

We will store recordings of telephone conversations for the purposes of documenting claims processing for a period of 18 months, after which they will automatically be erased. Telephone conversations we record with a view to investigating potential insurance fraud will generally be erased three months after the telephone conversation was recorded.

If a recorded conversation forms part of a specific complaint, dispute or other type of case processing, we may store the recording for as long as is required to solve or document the relevant case under the statute of limitations or other legislation.

#### **You are entitled to object to our recording of the telephone conversation**

In connection with the conversation, we will generally always provide information about whether we record the conversation and the specific purpose of the recording. As it is necessary for us to document the contents of certain conversations, participating in the recording is generally not optional, but you are allowed to object at any time. You are also welcome to contact us in writing if you want to avoid having conversations recorded altogether or if you want to request erasure of previously recorded conversations.

If you object, we will reassess whether the processing of your personal data should be affected or whether your situation means that your objection should be allowed.

## Recordings for employee training and business development purposes

Subject to your consent, we record telephone conversations for employee training and business development purposes.

### Which categories of personal data do we process?

- contact details, for example name and telephone number;
- date of birth and civil registration (CPR) number;
- offer, policy, customer and claims numbers;
- insurance information about you or the item insured;
- health information, for example illness or accident;
- information about any entries in the Danish Motor Insurers' Bureau.

### Our basis for processing your personal data

- We process your personal data based on your consent (article 6(1)(a), of the GDPR).
- In some cases, we process health information based your explicit consent (article 9(2)(a), of the GDPR).
- In some cases, we process information about entries in the Danish Motor Insurers' Bureau (section 8(3), second sentence, of the Data Protection Act, cf. article 10 of the GDPR).

### When and for how long do we store your personal data?

If you consent to us using the recording to train our employees or for business development purposes, we may use the specific recorded conversation for the specified purpose for a period of three months after the telephone conversation was recorded. Consenting to such recordings being used for employee training and business development purposes is optional, and refusing consent will have no consequences for you.

You may withdraw your consent at any time by contacting us at [persondata@codan.dk](mailto:persondata@codan.dk). Withdrawing your consent will have the effect that we will no longer use the conversation for training or business development purposes.

## 9. When you visit our locations

We process your personal data when you visit our locations. The purpose of the processing is to ensure the physical security at our offices and in our IT environments.

### Which categories of personal data do we process?

- video footage in connection with CCTV monitoring.

### Our basis for processing your personal data

- We need to process and possibly disclose personal data, as we have a legitimate interest in monitoring selected risk areas in order to prevent and solve crime and to create security for our employees (article 6(1)(f), of the GDPR).

### From whom do we collect personal data?

We generally only collect the information you provide in connection with your visit and which is recorded in our CCTV footage.

### To whom do we disclose personal data?

We will only disclose such information as is relevant and necessary for us to investigate criminal activity, if so requested. Any disclosure of such information will take place on the basis of processing described in the section "Our basis for processing your personal data" above.

We may disclose personal data to:

- the Police.

### When and for how long do we store your personal data?

The CCTV footage will be stored for 30 days, after which we will automatically erase it. If the CCTV footage is disclosed to the Police, it will be stored for three months, after which we will automatically erase it.

## What rights do you have?

**You have the right to access** the personal data we process about you.

**You have the right to rectification.** This means that you may demand that we correct any inaccurate personal data about you or that we supplement your personal data with additional personal data if this will make the data more complete or up to date.

**You have the right to erasure.** This means that in certain circumstances you may have your personal data erased before the time by which we are ordinarily required to generally erase information.

**You have the right to restriction of processing.** This means that in certain circumstances we are no longer entitled to actively use and process your personal data but only to store them. You may exercise this right, for example if you believe that we are processing inaccurate personal data about you, or if you believe that our processing of data is unlawful.

**You have the right to data portability.** In certain circumstances, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to have personal data transmitted to another data controller.

**You have the right to not be subjected to automated decision-making.** This means that you are entitled to require that decision-making or profiling activities which have a significant impact on you are not exclusively based on automated processing. You thus have the right to demand human intervention and the right to speak to us if you want an explanation to a decision or want to contest a decision.

**You are entitled to object to direct marketing.** If we process your personal data for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing. This also applies to any profiling resulting in direct marketing. If you object to direct marketing, we are no longer entitled to use the personal data for direct marketing purposes.

**You are entitled to object to the lawfulness of our processing of your personal data.** You have the right to object when we process your personal data on the basis of our or a third party's legitimate interest (article 6(1)(f), of the GDPR). If you object, we will reassess whether the processing should be affected or whether your situation means that your objection should be allowed. If you want to object to our processing of your personal data, you may contact us. See contact details in the section "How to contact us" below.

**You may withdraw your consent at any time.** When we process your personal data based on your consent, you have the right to withdraw the consent. Withdrawal of consent may imply that you will not be able to obtain certain customer benefits. If you have consented to us processing your personal data or using them for marketing purposes, you may withdraw your consent by contacting us.

If you want to exercise your rights, you may contact us using the contact details set out in the section "How to contact us" below.

## To whom do we transfer your personal data?

### Transfer to data processors

As part of our collaboration with our data processors, we may transfer your personal data to those data processors when they process personal data for us, for example in connection with the provision of our IT systems.

### Transfer to third parties outside the EU and the EEA

If we transfer personal data to third parties outside the EU and the EEA, and if the European Commission has not adopted an adequacy decision for the country in question, we will only transfer personal data if the third parties have adopted the European Commission's standard contractual clauses

etc., which ensure a level of protection of personal data essentially equivalent to the protection provided within the EU and the EEA. You may receive a copy of the standard contractual clauses by contacting us.

## How to contact us

You may contact us at Codan Forsikring, Midtermolen 7, DK-2100 Copenhagen Ø, company reg. (CVR) no. 10526949, tel. +45 3355 5555 or e-mail [codan@codan.dk](mailto:codan@codan.dk).

If you want to exercise your rights or withdraw your consent, you may contact us by e-mail at [persondata@codan.dk](mailto:persondata@codan.dk) or by sending a letter to our address marked "Attn. The GDPR and Customer Ambassador", and we will then process your request as soon as possible.

If you want to complain about our processing of your personal data, or if you have any other questions, you may contact our Data Protection Officer by e-mail at [dpo@codan.dk](mailto:dpo@codan.dk) or by sending a letter to our address marked "Attn. The Data Protection Officer".

You are also entitled to file a complaint with the Danish Data Protection Agency. At the Agency's website ([www.datatilsynet.dk](http://www.datatilsynet.dk)), you may find information about how to file a complaint with the Danish Data Protection Agency.

## Amendments to this privacy policy

We regularly review and update this privacy policy. The privacy policy was most recently updated on 18 April 2024. The current version is available at [www.codan.dk](http://www.codan.dk).