

Privacy Policy - CO-industri

The applicable data protection legislation consists of the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) effective from 25 May 2018, together with the Danish Data Protection Act of 17 May 2018.

The EU GDPR and the Danish data protection act naturally also applies to the central organisation of industrial employees in Denmark (CO-industri)

It is therefore important for us to protect the personal information we receive and process. This concerns, among others, registration for CO-industri's events, processing of cases in our law system, applying for a position with us or if you register for our newsletter.

You can read more in our privacy policy below.

The privacy policy explains how CO-industri process your personal information, which categories of personal information it contains, as well as a description of the purpose and the legal basis of processing. There will also be a description of the cases where your personal information, is disclosed to a third party. It will furthermore be evident which rights you, as a data subject, can call on.

1. DATA CONTROLLER

The central organisation of Industrial employees in Denmark (CO- industri) is data controller for the processing of your personal information.

2. CONTACT INFROMATION

Centralorganisationen af industriansatte i Danmark

CVR: 51892119

Molestien 7, 3.

2450 København SV

O INDUSTRI

Denmark

E-mail: co@co-industri.dk

Phone nr..: +45 33 63 80 00

3. PROCESSING

Seminars, meetings and conferences at CO-industri

Purpose: Handling the seminar administration. It is necessary to transfer personal information about you, when you participate on a seminar administrated by FIU, to be able to support and administer the

FIU-system

Categories of personal information: In addition to ordinary personal information such as name, postal

address, employer, workplace, education, job title, and elected positions, sensitive personal information

is also processed, including information about trade union membership.

National identification number is also processed, to ensure precise identification in the system.

Information sources: CO-industri receive personal information directly from you, when you use the

registration page for FIU seminars and mitfiu.dk or from your union.

Legal basis of processing: The information is processed with legal basis under Article 9(2)(b)

Recipients: CO-industri uses external system suppliers and business partners, who supply systems,

support, service and who through this will have access to personal information. CO-industri will enter

into a data processing agreement with them.

Storage: We store the information, as long as necessary for the aforementioned purposes, and they will

be deleted afterwards.

Information concerning accounting records, is deleted after 5 years plus the current year, cf. the Danish

Bookkeeping Act



Case handling in our law system

Purpose: The trade union of which you are a member may request assistance from CO-industri in connection with any labour-related cases in which you may be involved.

Categories of personal information: In connection with labour-related cases ordinary and sensitive information will be processed, this includes, but is not limited to: Name, employer, national identification number, wages, papers of employment, photo and health information.

Information sources: CO-industri receives personal information from among others CO-industri's member union, Dansk Industri, FH and you.

Legal basis of processing: The aforementioned personal information is disclosed by your union, Dansk industri, FH and from yourself with the legal basis under Article 9(2)(b) in the GDPR and in the so-called legal claims provision in Article 9(2)(f), as well as their processing by CO-industri on the basis of this legal ground, and also pursuant to Article 9(2)(d) of the GDPR.

Recipients: The information will be disclosed to the relevant parties in the case, this includes the labour court, parties and judges in the industrial arbitration, the Danish Employment Tribunal for Dismissals, The Danish Equal Pay Board, as well as pension companies

Storage: As it is possible for a case to be reopened, your information will be stored depending on a specific assessment and pursuant to the Limitation Acts chapter III.

Usage.of.Al

We use AI for text analysis and summary regarding our industrial relations work. We have clear guidelines and quality controls regarding the usage of AI. We never let the AI make decisions. We never use your information for further training of the AI-tools.

When we use AI for our administrative procedures this way, we ensure all information is processed internally and thereby on the grounds of Article 9(2)(b) in the GDPR.

TR-web

Purpose: Payment of union representative remuneration and invitations to CO-industri activities.

Categories: In connection with the registration of your enrolment in TR-web, both ordinary and sensitive information will be processed, this includes, but is not limited to: Name, address, phone number, e-mail address, employer, national identification number, as well as trade union membership.



Information sources: CO-industri receives personal information from, among others, CO-industri's member union, Dansk Industri and you.

Legal basis of processing: The aforementioned personal information is disclosed from your trade union and yourself on the grounds of article 9(2)(b) a) in the GDPR and in the so-called legal claims provision in Article 9(2)(f), as well as their processing by CO-industri on the basis of this legal ground.

Recipients: The information will be disclosed to your union and Dansk Industri.

Storage: We store the information, as long as necessary for the aforementioned purposes.

Processing of cases in committees and boards

Purpose: Co-industri are represented in different trade committees and boards as appointed/selected members. This can be The Danish Working Environment Appeals Board, the Employment Committee of the Danish Appeals Board, and the Occupational Diseases Committee.

Categories: In connection with the processing of these cases, both ordinary and sensitive information will be processed, this includes, but is not limited to: Name, employer, national identification number, wages, papers of employment, photo and health information, as well as trade union membership.

Information sources: CO-industri receives personal information from public authorities, member union and you.

Legal basis of processing: Committee members may be appointed by the Minister for Employment after being nominated by CO-industri, and in other cases, appointed/selected participants who derive their authority from, among other legislation, the Danish Working Environment Act.

Recipients: Cases will be discussed at committee and board meetings.

Storage: Information from meetings where individual cases are considered is subsequently stored, as it may become the subject of an appeal. Information will be stored depending on a specific assessment and pursuant to the Limitation Acts chapter III.



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Newsletter

Purpose: Publication of newsletters and press releases.

When you subscribe for our newsletter, it is necessary to process your personal information. This concerns your ordinary information according to the GDPR article 6, and includes your name, e-mail address, any elected or appointed union positions you may hold and IP-address. The purpose with the processing is to be able to send you our newsletter, as well as collecting information about your use of the newsletters for the purpose of their future optimisation.

When we process your personal information, with the intention of sending it to you, it happens based on your consent cf. the GDPR article 6(1)(a), which you gave in connection with subscribing to our newsletter or due to you automatically being subscribed as a person in an elected or appointed union position.

When we collect information about your usage of the newsletters to optimise them, it also happens through your explicit consent cf. the GDPR article 6(1)(a). If you have given your consent, we can collect information about; at which time you opened the newsletter, where you clicked in the newsletter, which device you used to open the newsletter, as well as which part of the country you opened it from.

The information is, however, used only in anonymised form and to generate aggregated statistics.

When you consent to the newsletters cf. above, your information is disclosed to our suppliers, who has responsibility for sending out the newsletters, and who we have entered into a data processing agreement with.

You can at any time withdraw your consent and unsubscribe form the newsletter. You do this by pressing the link "Unsubscribe newsletter" at the bottom of your newsletter, or by contacting us through the



contact information at the top of this page, with a message about your wish to unsubscribe from the newsletter.

Homepages

When you visit our homepage <u>www.co-industri.dk</u> and <u>okfakta.dk</u>, personal information about you is collected. This concerns among others the following information:

- Ip-address
- Network position
- Information about which device you use.
- Search words you use on the homepage
- Information about which browser you are using

We collect personal information about website visitors with the following purpose:

Optimal administration and operation of our website

We collect the information based on your consent, which you give through the Cookie banner cf. the GDPR article 6(1)(a)

Information, collected as part of the administration and operation of the website (which is necessary for the use of the website,) is processed based on our legitimate interests cf. Article 6(1)(f) of the GDPR.

We store the information in the timespan allowed by the legislation, and we delete them when they are no longer necessary. The period depends on the character of the information and the background for the storage. Your consent is voluntary, and you can withdraw it at any time by contacting us. Use the contact information above, if you have any questions.

CO-industri has a closed members area, where employees in CO-industri's member unions as well as union representatives has special access. The area contains no personal information but grants access to exclusive information and tools. CO-industri uses cookies to follow the traffic on the homepage with the purpose of optimising the user experience. The visitor is made aware of the usage of cookies when visiting the homepage and can limit the use of cookies at this point.



Categories of personal information: Access to the closed off part of CO-industri's homepage works with MitlD. When logging in, a national identification number and password are provided. Cookies are used to record visited pages, browser type, time of visit, and IP address.

Information sources: CO-industri receive personal information from their member unions.

Legal basis for processing: CO-industri only sets up and process information about users of the closed off part of CO-industri's homepage with consent from the user, when they log in.

Recipients: CO-industri's homepage is hosted by an external supplier, who CO-industri will enter into a data processing agreement with.

Storage: Your information is stored, until you withdraw your consent. Afterwards your information will be made anonymous and will be used to generate aggregated statistics

Cookies: We use cookies to adjust our content and analyse our traffic on co-industri.dk and okfakta.dk. We share the information of your use of our homepage, with our analysis partners. Our partners can combine this information with other information you have given them, or that they have collected from your use of their services. You consent to our cookies, if you continue using our homepage.

Cookies are small text files, that can be used by websites to improve user experience.

The law determines that we can store cookies on your device, if they are strictly necessary to ensure the delivery of the service, that you have explicitly requested to use. We will collect your consent for all other types of cookies.

This website uses different types of cookies. Some cookies are set by third-party services displayed on our pages.

You can at any time change or withdraw your consent through the cookie declaration on our homepage.

Learn more about who we are, how you can contact us, and how we process personal information in our Privacy Policy.



Ordering of printed materials

Purpose: CO-industri offers the option to order printed material through the homepage co-indistri.dk.

Categories of personal information: When ordering printed materials information such as name, e-mail address, postal address, phone number and trade union membership are processed.

Information sources: CO-industri receives the personal information, from the person who makes the order.

Legal basis of processing: CO-industri process the information based on consent.

Recipients: The information is stored on CO-industri's internal brochure module, that is hosted at an external supplier, who CO-industri will enter into a data processing agreement with. The information is hereafter processed by CO-industri to ship the orders.

Storage: Information is deleted up to a month after the ordered printing material has been shipped.

SMS service

Purpose: In connection with nominations for CO-industri's Collaboration Award, CO-industri provides the option for union representatives to use an SMS service to submit their nominations.

Categories of personal information: When submitting a nomination, information about the submitter's name, phone number, and company name is processed.

Information sources: CO-industri receives personal information by the person who submits the nomination.

Legal basis of processing: By using the service you consent to processing of the submitted information cf. the GDPR article 6(1)(a).

Recipients: The information is processed by Mobitech Telecom, who is a data processor on behalf of CO-industri. The processing takes place through a communication platform that enables messages to be sent to end users. The platform is hosted in Denmark by external suppliers, that CO-industri has entered into a data processing agreement with.



Storage: Transaction data, including SMS/MMS-content, is stored for 3 months and is automatically deleted from Co-industri's data processor(s) after.

Job applications

Purpose: Recruiting employees for CO-industri, including evaluation of job applicants.

Categories of personal information: Name, birthday, gender, postal address, e-mail address, phone number, application, photo, CV, grades, diplomas, and potential references and recommendations.

Information sources: CO-industri only process the information, you give us consent to collect.

Legal basis for processing: CO-industri process the information according to the stated consent, collected when you send in your application, unless something else has been agreed upon with you.

Recipients: Your information will not be disclosed to a third party and is only processed internally.

Storage: If you are not offered a position, your application and any annexes will be deleted, when the recruitment process for the relevant position is finished.

Suppliers and business partners.

Purpose: The processing of personal information is intended to enable us to fulfil our obligations under the agreement and to ensure smooth communication

Categories of personal information: Name, phone number, e-mail, position, and any additional contact information.

Legal basis of processing: CO-industri process this information according to our contract or to be able to fulfil a contract cf. the GDPR article 6(1)(b).

Storage: Information collected in this context will, as a general rule, be deleted once the agreement has been fulfilled, unless there is a specific reason to retain the information for a longer period, such as a warranty period, or if a need arises to file a complaint.

We are required to keep accounting records for 5 years plus the current year pertaining the purchase or sale. This may include personal information that will be deleted simultaneously with the accounting records.



Social media

Purpose: We process your information to keep interested followers or members updated on, among others, relevant posts, new areas and important considerations for the organisation et cetera.

Categories of personal information: Name, likes and potentially comments

Legal basis of processing: CO-industri process your personal information on the basis of our interest in marketing our organisation cf. the GDPR article 6(1)(f)

Facebook

We are joint data controllers with Meta regarding the information, that is collected, about you, when you visit our page on Facebook. This means, that we, along with Meta, are required to allocate and define the responsibility for complying with the legislation when processing your personal information.

You can find our agreement of joint controllership here:

https://www.facebook.com/legal/controller_addendum

Meta use Insights on Facebook to gather statistical information about visitor behaviour on the page, this includes age, gender, relationship status, work, lifestyle, interest areas, information about purchases and geographical information. Meta has placed cookies on your device, when you visit Facebook for this purpose.

All cookies contain an identification code, and they stay active for a period of 2 years, unless they are deleted prior to the end of that period. Meta gathers, saves and processes your personal information with the help of those cookies. We only receive the aggregated statistics based on this information. You can read more about Facebook's use of cookies here:

https://www.facebook.com/privacy/policies/cookies/

We do not disclose information, we receive from Meta about you. Though Meta can disclose information about you to third parties. You can read more on that in their Privacy Policy here: Meta's policy on protection of personal information — How Meta processes and uses Meta userdata

If you wish to delete your cookies, you can find out how to, through our cookie banner or contact Meta



Meta process information about you, even when you do not have an account with them. You can read more about it here: Meta Privacy Policy - How Meta collects and uses user data | Privacy Center | Manage your privacy on Facebook, Instagram and Messenger | Facebook Privacy

Use of pictures

Purpose: We publish harmless pictures on the internet, as long as they do not focus specifically on a private individual, if we determine, the picture has a positive effect on the outside world's perception of us, either as a workplace, a business partner or in other matters.

Categories of personal information: Photo, name and title.

Legal basis for processing: We consider this to be based on our legitimate interests (Article 6(1)(f) of the GDPR). If an employee or data subject is to actively participate in marketing, videos, or other forms of collaboration with us, we will ensure that this takes place on the basis of your consent (Article 6(1)(a) of the GDPR) or through a model contract (Article 6(1)(b) of the GDPR).

Storage: Pictures will be deleted, if we determine, they no longer serve their purpose, if a contract for the usage of a picture ends or if you withdraw your consent. You always have a possibility to object to our use of images in which you appear.

4. DISCLOSURE OF INFORMATION

We utilise external suppliers/business partners for storage and processing of personal information. When we use a data processor, we have entered into a data processing agreement with them. They will therefore only process personal information on our behalf and are not allowed to use them for their own purposes.

We prioritise suppliers from EU, as well as third countries, approved by the EU commission regarding the level of protection of personal information, pursuant to Article 45 of the GDPR.

In certain cases, personal information may be disclosed to independent data recipients, such as banks, debt collection agencies, shipping companies, etc.



Non-secure third countries

We also use certain data processors/providers in non-secure third countries. When the legislation in these third countries does not provide the same level of protection as the EU, we have enhanced obligations to safeguard your information.

Your information can be transferred to data recipients in e.g. the US based on e.g. the EU commissions standard contractual clauses cf. the GDPR article 46(2)(c) or Data privacy framework cf. the GDPR article 45(9). You are welcome to contact us, if you need further information. You can also get the relevant documents handed over for proper guaranties.

5. THE DATA SUBJECTS RIGHTS

The GDPR gives you the following rights:

Right of access: This means, you can request us to grant you access to the information we have on you, as well as get them surrendered.

Right of rectification: This means you have the right to get incorrect information corrected.

Right of erasure: You have the right to get information we process about you deleted. There can be certain exceptions, that includes, us not being able to delete information we are required to keep cf. the legislation or where the information is required to establish or exercise legal claims

Right to restriction of processing: You have the right to request the restriction of the processing of your personal information, if you believe that your information is inaccurate or if the information is being processed unlawfully. Furthermore, you also have the right to restriction if your information needs to be retained to establish or exercise legal claims, or if you have objected to the processing.

Right to object: You have the right to object to the processing of your personal information, if it is used for direct marketing purposes.

Right to data portability: This means that you can receive the personal information you have provided in a structured, commonly used, and machine-readable format in order to transfer it to another entity.



In addition, you may withdraw your consent at any time if the processing is based on your consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the GDPR.

You also have the right to lodge a complaint with the Danish Data Protection Agency.

Please note that certain conditions and exceptions may apply to the exercise of the rights described above. Your request will therefore always be assessed on a case-by-case basis. For more information, see Chapter III of the GDPR.

6. SECURITY

CO-industri has ensured, through an internal security policy, guidelines for the processing of personal information, and ongoing monitoring, that your personal information is processed securely and confidentially. We have also implemented the necessary technical and organisational measures aimed at protecting against unauthorised access and destruction.

7. COMPLAINT

You have the right to lodge a complaint with us if you are not satisfied with our processing of your personal Information. You also have the right to lodge a complaint with the Danish Data Protection Agency at Borgergade 28, 5., 1300 Copenhagen K, Denmark. Website: www.datatilsynet.dk

8. LEGISLATION

General Data Protection Regulation (GDPR)

Danish Data Protection Act