



# PERSONAL DATA POLICY

for employees

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DANISH TECHNOLOGICAL  
INSTITUTE

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# 1 Introductory remarks

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## 1.1 Purpose

1.1.1 At the Danish Technological Institute, we will continuously electronically/automatically process various personal data about you. We are therefore obliged to inform you about what data about you we obtain, record, share or otherwise process.

1.1.2 In general, the purpose of processing your data is the management of your working conditions in connection with the course of employment and the termination of the employment relationship, including in relation to benefits, etc. you are entitled to as well as the obligations to which you are subject.

## 1.2 Data responsibility

1.2.1 The Danish Technological Institute is the data controller for the data processed by us in connection with your employment, and the Danish Technological Institute is thus responsible under data protection legislation for the legal processing of your personal data.

1.2.2 At the Danish Technological Institute, we have a special contact person who has day-to-day responsibility for our processing of personal data. Our contact person has the following contact information:

### **Andras Splidt**

Email: [asp@dti.dk](mailto:asp@dti.dk)

Telephone: +45 72 20 20 06

You must contact the contact person if you have any questions about our processing of your personal data or if you wish to exercise your rights under the data protection legislation.

1.2.3 If you have any questions regarding staff administration, you can contact:

### **Annette Holst Vinther**

Email: [ahv@dti.dk](mailto:ahv@dti.dk)



## 2 Processing of personal data in HR

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### 2.1 Staff Folder

- 2.1.1 Upon commencement of employment, we create a staff folder in our IT system. Here we register – together with you – a variety of personal data that will generally originate from yourself.
- 2.1.2 We record identification data, including your name, civil registration number, private address, private and work phone numbers, private and work email addresses, date of birth, gender, initials and employee number.
- 2.1.3 Relevant data about your background and work is also recorded, including education, job description, date and type of employment, internal and external work history, seniority, continuing education, competencies, duties and times, which centre and division you are employed in, who is your boss, whether you have been redeployed internally at the Danish Technological Institute and whether you have had leave or other absence. There may also be registered rosters as well as overviews of which employees have access to specific customers, projects, facilities, training, etc. In case of foreign employees or

employees posted or participating in projects abroad, copies of passports and work and/or residence permits may also be registered.

- 2.1.4 In addition, data on salary, sick leave, periods of illness, pension conditions, tax disclosures and account number is recorded.
- 2.1.5 Data on other official matters, including any indictments and warnings, as well as minutes of staff performance reviews, sick leave conversations, as well as other conversations and meetings are recorded.

The basis for the processing of the data we process under paragraphs 2.1.2 - 2.1.5 is that the processing of the data is necessary in order to fulfil the employment contract you have entered into with us as well as the balancing of interests rule. The legal basis is Paragraph 6 (1) of the Danish Data Protection Act (Act No 502), cf. Art. 6 (1) (b) and (f) of the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016). The basis for processing of data described in paragraph 2.1.3, last sentence, is that the processing is necessary for us to comply with an obligation laid down in other legislation, etc., or pursue a legitimate interest arising from other legislation, etc. in accordance with Section 12 (1) and (2) of the Danish Data Protection Act.

- 2.1.6 Medical certificates, declarations of work capacity as well as other documentation of illness may also be recorded. To the extent that health data is processed, this is done because it is necessary to observe the obligations, etc. which either follow or arise from legislation and/or our employment-law obligations.



In such cases, the basis for processing is that processing is necessary for us to comply with an obligation laid down by other legislation, etc. or pursue a legitimate interest arising from other legislation, etc., in accordance with Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is, among other things, the provisions of the Danish Sick Leave Act or the Danish Health Information Act.

- 2.1.7 In addition, information on union representatives and other protected staff shall be recorded to the extent necessary to comply with the obligations, etc. arising from the collective agreement basis.

The processing basis for the processing of data on union representatives and other protected staff is that the processing is necessary in order for us to comply with an obligation set out in or arising out of other legislation or collective agreement. The legal basis is Section 12 (1) and (2) of the Danish Data Protection Act.

- 2.1.8 We will also record the data about next of kin you have given us in order to let them know if you fall ill or have an accident.

The processing basis for the registration of data about your next of kin is the balancing of interests rule, as we consider that the processing is necessary for us to pursue the legitimate interest of being able to contact your relatives should this be necessary, e.g. if you become ill, etc. while you are at work. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

- 2.1.9 We may integrate the data in the system with data about other employees, for example, to make different types of statistics and statements. This could be sick leave statistics, statistics on age distribution in units and areas, redeployment frequency, etc.

- 2.1.10 Some of the data is recorded in several places. This applies, among other things, to data on absence due to illness, leave, holidays, birthdays, etc.

- 2.1.11 Some of the data will be incorporated into your employment contract by us. The signed contract is kept in your staff folder, and you will have it sent via e-boks. We also store the data electronically in our IT system and to some extent also on the intranet. Take a closer look at the next page.

2.1.12 Our electronic staff management is separate from all other cases, and only employees with special rights can view the staff cases. Generally, it will be staff from Human Resource and Development as well as your current boss and division director, cf. the organisational chart in effect at any given time of the Danish Technological Institute.

2.1.13 All the mentioned personal data must be processed in accordance with the guidelines and frameworks established by data protection legislation.

## **2.2 Absence/Holiday**

2.2.1 We will record your absence due to illness, child sick days, maternity and other forms of leave and absence, including so that we may be able to get reimbursement for the hours you are away. We also use the records to make a sick leave statistic. If the legislation allows us to obtain a refund, we will send the relevant data about you, including your civil registration number, to the authorities that perform this task, including Udbetaling Danmark and your municipality. The same applies in relation to relevant insurance schemes.

The basis for processing is that the processing of your absence information is necessary in order to fulfil the employment contract you entered into with us or that the processing is necessary for us to comply with an obligation as established in other legislation, etc. or pursue a legitimate interest arising from other legislation, etc. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (b) of the GDPR and Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is,

among other things, the provisions of Chap. 10 of the Danish Act on Entitlement to Leave and Benefits During Maternity Leave and Chapter 19 of the Danish Sickness Benefit Act.

2.2.2 We also record your use of statutory days of holiday, holidays in advance and self-paid days of holiday. Holidays are managed by our external payroll manager, and information about your holiday is therefore passed on to our external payroll administrator.

In such cases, the basis for processing is that sharing is necessary for us to comply with an obligation as established in other legislation, etc. or pursue a legitimate interest arising from other legislation, etc., in accordance with Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is, among other things, the provisions of the Danish Holiday Act.

2.2.3 If you are an hourly employee or if in connection with dismissal/resignation you are entitled to receive holiday pay, FerieKonto will be informed of your holiday and holiday pay.

In such cases, the basis for processing is that sharing is necessary for us to comply with an obligation as established in other legislation, etc. or pursue a legitimate interest arising from other legislation, etc., in accordance with Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is, among other things, the provisions of the Danish Holiday Act.

## 2.3 Pregnancy, maternity/paternity leave, etc.

2.3.1 In accordance with the rules on absence in connection with pregnancy and leave, we register data on expected time of birth, the birth itself, periods of leave, etc. In this regard, we process — as evidence of the expected date of birth/term — a copy of the maternity record or a certificate from the doctor indicating the date of the expected birth.

2.3.2 We also disclose data about birth, wages, working hours, leave, etc. to Udbetaling Danmark for the receipt of maternity benefits, etc. This applies in relation to the types of leave covered in 2.3.1.

In such cases, the basis for processing is that the registration and sharing of the data is necessary for us to comply with an obligation laid down in other legislation, etc., or pursue a legitimate interest arising from other legislation, etc., cf. Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is, among other things, the provisions of Chap. 10 of the Danish Act on Entitlement to Leave and Benefits During Maternity Leave.

## 2.4 Positions with wage subsidies, including flexible jobs

2.4.1 If you are employed in a position with wage subsidies, including flexible jobs, this will be registered with us. In order to obtain a refund, we will contact your municipality or other public authorities, which in connection with this, can access relevant data about your employment.

In such cases, the basis for processing is that processing is necessary for us to comply with an obligation laid down by other legislation, etc. or pursue a legitimate interest arising from other legislation,

etc., in accordance with Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is, among other things, the provisions of the Danish Active Employment Act.

## 2.5 Time recording

2.5.1 Our time registration system records your working hours and attendance when you take days off and the type of days off you take and when and for how long you are sick.

2.5.2 You will need to use the system to register when you start and finish your work. Once you have requested and been approved holidays, full flexible days and other days off, these must be recorded through the time registration system. Days off must be recorded as used in the system once you have used them.

You must also register absence due to illness in the system. However, in case of long-term illness or leave, we will register it for you, and similarly, we record when your sick leave or leave ends.



The basis for processing is that the processing of the data is necessary in order to fulfil the employment contract you have concluded with us. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (b) of the GDPR.

## **2.6 Salary, tax and Danish Labour Market Supplementary Pension**

2.6.1 The Danish Technological Institute uses a remuneration system administered by our external payroll administrator.

2.6.2 Our payroll is done so that your data is entered into the payroll system and the payroll process itself is carried out by our external payroll administrator. When we indicate your salary, we use your civil registration number. Our total wage bill is transferred via the payroll system to our banking connection, which will ensure that your wages are sent to the account at your bank. An electronic copy of your payslips will be transferred to mit.dk. You will thus have access to the payslips via mit.dk. We also have access to the payslips, which we can access electronically via our access to the payroll system.

2.6.3 If we have to pay you an amount independent of your monthly wage payout, the procedure is the same.

The basis for processing is that the processing of the data is necessary in order to fulfil the employment contract you have concluded with us. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (b) of the GDPR.

2.6.4 We will receive your tax information directly from SKAT. If there are changes to your tax deduction card, we will be notified automatically. Every month, tax deducted from income at source and labour market contributions are transferred to SKAT through the payroll system. At the same time SKAT receives certain data about you Name, address, civil registration number, place of employment, your gross salary as well as data on staff benefits. SKAT will also be informed of what you collectively earned over the course of the year.

2.6.5 The payment of monthly contributions to the Danish Labour Market Supplementary Pension is also made through the wage system. SKAT will be informed every year how much you paid to the Danish Labour Market Supplementary Pension.

The basis for processing is that the processing is necessary for us to comply with an obligation laid down in other legislation, etc., or pursue a legitimate interest arising from other legislation, etc., cf. Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is, among other things, the provisions of the Act on Labour Market Contribution and the Danish Withholding of Tax Act, Chapter V.

2.6.6 Information about your pension payments and pension company is provided to SKAT and our external payroll administrator. Your name, social security number and the amount are shown in the transfer. Read more about pension below. For purposes of taxation, it is also disclosed to SKAT if you have health insurance.

## **2.7 Pension/Health Insurance**

2.7.1 Permanent employees of the Danish Technological Institute are subject to a compulsory pension





scheme. The pension scheme depends on your employment contract. Pension payments from the employee and the Danish Technological Institute to the pension scheme are made as a monthly contribution performed through the payroll system. Read more information about pensions in the Employee Handbook – Pension.

The basis for processing pension information is the balancing of interests rule or that processing is necessary for us to comply with an obligation set out in or arising out of other legislation or collective agreement. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) GDPR or Section 12 (1) and (2).

- 2.7.2 The employees of the Danish Technological Institute are covered by a health insurance policy that covers treatment for various types of illness, injuries and other ailments. In connection with the employment, the employee's civil

registration number, name and work email address are shared with the insurance company. The insurer, on this basis, makes contact with the employee for the purpose of registering the employee. The Danish Technological Institute receives data on which employees are covered by the insurance so that premiums can be paid for them. The Danish Technological Institute does not receive person-specific data on the use of health insurance, just statistical information.

The processing basis for the processing of personal data in connection with health insurance is that the processing of the data is necessary in order to fulfil the employment contract you have concluded with us. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (b) of the GDPR.

## **2.8 Bonus**

- 2.8.1 If you are covered by a bonus scheme, the Danish Technological Institute will also process information about you to assess whether you have met the bonus criteria. This may, for example, be information about your performance. Please refer to the bonus scheme applicable at any time. If bonus payouts are to be paid, this payout will be handled by our external payroll administrator in accordance with the above principles.

The basis for processing is that the processing of the data is necessary in order to fulfil the employment contract you have concluded with us. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (b) of the GDPR.

## 2.9 Pictures

2.9.1 In connection with your employment, we store portrait and situational images of you - either in the form of photographs or video material. The picture material is used on the intranet as well as internally in Outlook, Teams, and the contact list on the mobile phone. The picture material can also be used on our website, as well as in external information materials, including both in print and digital media. Please refer to the details under the relevant sections below.

The processing basis for storing portrait and situational image of you is the balancing of interests rule or your consent given to the retention of portrait and situational images of you. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) and Art. 6 (1) (a) of the GDPR.

## 2.10 Information on the intranet

2.10.1 On the intranet we record information about your name, job description, area affiliation, location in the organisational hierarchy, physical location, phone number, email address and possibly LinkedIn address.

We also put a picture of you on the intranet. This takes place so that your colleagues can easily find you if they need to contact you.

2.10.2 The intranet also provides information about the various administrative and other tasks for which you are responsible/contact person. This could also be information about what competencies you have, for which subject matter you are a professionally responsible or similar.

The processing basis for the disclosure of your data on the intranet is the balancing of interest rule, as we consider that the processing is necessary for us to pursue the legitimate interest that your colleagues and others can easily access information about you if they need to contact you. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.



# 3 Processing of personal data in other contexts

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## 3.1 Using the Internet

3.1.1 We record your visits to internet sites centrally. The pages will also be automatically registered on your PC in the Temporary internet files folder and in the Overview folder.

3.1.2 Reference is made to IT security for users which is available on the Intranet and where, among other things, further details on the control, monitoring, etc. of Internet visits are described.

The processing basis for recording your visits to Internet sites is the balancing of interest rule, as we consider that the processing is necessary for us to pursue the legitimate interests or recording technical and security considerations as well as verifying whether you have used internet in breach of our respective guidelines. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

## 3.2 Emails/Teams

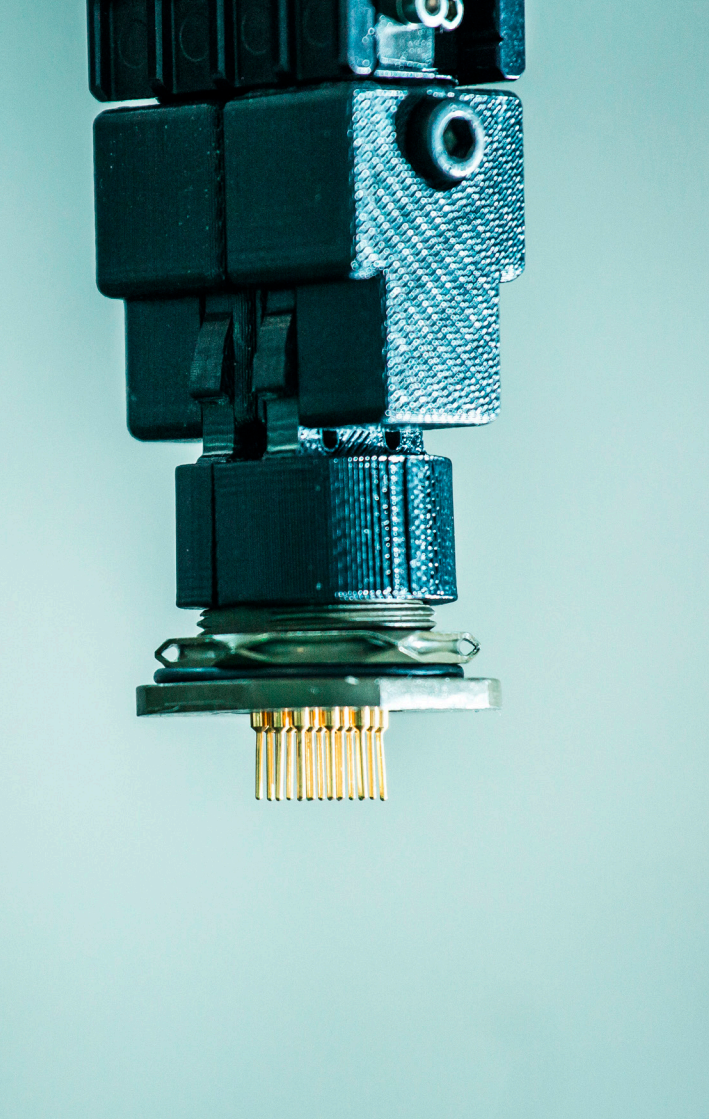
3.2.1 We centrally log the emails that are sent to and from your email address at the Danish Technological Institute. That is, we record who the email is from and to, that it has been sent to or from you, when the email has been sent and received, the content of the subject field and the content of emails that you receive and send. Similarly, we record the use of Teams, i.e. when and to whom communication takes place and the content thereof.

3.2.2 Please refer to our IT security for users which is available on the Intranet and where, among other things, further details about checking and monitoring, etc. of emails and Teams are described.

The processing basis for the logging of your emails is the balancing of interest rule, as we consider that processing is necessary for us to pursue the legitimate interest of being able to ensure operation, security, re-establishment and documentation as well as to check if you have sent emails in accordance thereto. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

## 3.3 Calendar System/Outlook

3.3.1 In your electronic calendar in Outlook, you will register appointments for meetings, absence, etc. Other employees may send you invitations to meetings, etc. which will be temporarily registered in your calendar until you have accepted or declined them. The employees who have accessed your calendar can also create appointments, etc.

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- 3.3.2 The content of your calendar is generally visible to all employees at the Danish Technological Institute, Dancert A/S and Danfysik A/S. However, there is an opportunity to mark appointments as private, so that you are the only one who can see the content. Others will only be able to see that you are busy. The registrations in the calendar are stored in Outlook, but can be changed or deleted by yourself or those to whom you have given access to the calendar.

The processing basis for recording your data in the electronic calendar is the balancing of interests rule, as we consider that processing necessary for us to pursue the legitimate interest of being able to take organisational and planning actions based on the data you have recorded. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

### **3.4 IT Systems**

- 3.4.1 In principle, when you use our IT systems all uses are logged. That means we can see what you have done in the system at a given time - for example, created a project or document, or changed a project title or document description.

The processing basis for logging your use of our IT systems is the balancing of interests rule, as we consider that the processing is necessary for us to pursue the legitimate interests that is, to ensure compliance with the requirements for adequate security measures under data protection legislation and, for technical and security reasons, to record and verify whether you have used the IT systems in violation of our guidelines. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

### **3.5 Phones and tablets**

- 3.5.1 We do not record your phone calls (either outgoing or inbound), but your mobile phone locally records which numbers you call and get called by and when. You can delete the call lists in your phone at any time.
- 3.5.2 Your mobile phone and tablet will detect and store data in emails, text messages, MMSs, apps, and pictures, etc. that you write, post or take. You can also delete this data as well as images at any time.

3.5.3 When you hand over your mobile phone and tablet, etc. - for example, because you are no longer employed by us or because it needs to be switched to a new one - these are reset so that previous calls, emails, text messages, MMSs, information in apps and pictures, etc. are deleted.

3.5.4 Refer to IT Security - Securing your iPhone, which is available on the Intranet.

### **3.6 Employee Card**

3.6.1 At the Danish Technological Institute, employees have an employee card (key card), which activates our electronic door locks. The locks are connected to an alarm system. Your door card has a number that will be recorded in an electronic log when you open a door with an electronic lock. The log shows where and when your card has been used. We only use it in very special cases, e.g. in case of burglary. The electronic log is periodically overwritten and thus is not permanent. If you stop a triggered alarm using your door card, it will also be detected.

3.6.2 The processing basis for recording your use of key cards is the balancing of interests rule, as we consider that processing is necessary for us to pursue legitimate interests with respect to crime, so as to ensure security for our employees and to secure evidence and thus data for use for police investigations in case of crime. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

### **3.7 TV Surveillance**

3.7.1 We have TV surveillance cameras, which are primarily located in the outdoor areas of the Danish Technological Institute. It is marked with signage the places where the cameras are located.

3.7.2 The purpose of television surveillance is to prevent and solve crime and to provide security for employees. Please refer to our Employee Handbook under the "Video Surveillance" section, which is available on the Intranet.

3.7.3 The processing basis for television surveillance at work is the balancing of interests rule, since we deem that processing is necessary for us to pursue the legitimate interests of crime prevention, ensure security for our staff and secure evidence and thus information for police investigations in cases of crime. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

### **3.8 Company car**

3.8.1 In connection with the use of company cars, it can be recorded who is using the car during which time, the project name, the purpose of driving and the geographical location of the car.

3.8.2 Please refer to the memo on Travel, Driving and Out-of-Pocket Expenses - Driving in the Institute's Cars, available on the Intranet under Finances.

3.8.3 The processing basis for registering your use of company cars is the balancing of interests rule, as we consider that the processing is necessary for us to pursue the legitimate interests of being able to control the location of our company cars and who uses them at what time in order to check whether the company cars are used in accordance with our guidelines. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

### **3.9 Lunch scheme**

3.9.1 We register if you participate in the Danish Technological Institute's lunch schemes in Skejby. This is done in order to ensure that the Danish Technological Institute can pay its part of the lunch scheme at this location.

The basis for processing for registering data about your use of these lunch schemes is that processing the data is necessary in order to fulfil the agreement you have entered into on using the lunch scheme. The legal basis is Section 6 (1) of the Data Protection Act, cf. Art. 6 (1) (b) of the GDPR.

### **3.10 Staff association/art association/fitness centre**

3.10.1 We register if you join our staff association, arts association and/or fitness centre. This is done in order for you to be deducted in pay for this.

The basis of processing for recording data about your use of our staff association, arts association and/or fitness centre is that the processing of the data is necessary in order to fulfil the agreement you have entered into to use the scheme. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (b) of the GDPR.



# 4 Storage, transfer, sharing, etc.

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## 4.1 Storage of personal data

- 4.1.1 The data about you is kept and processed at the company's address and/or on the company's own servers.
- 4.1.2 Certain data is also stored and processed by our data processors in connection with our external payroll management, external onboarding system, external dispatch of employment contracts, external handling of our personality tests, employee satisfaction surveys, workplace assessments as well as for the operational and IT security tasks (such as backup, hosting website, etc.) that we also have performed externally. Storing data with external partners (our data processors) is also subject to the rules of data protection legislation, and data processing agreements have been signed with the data processors to ensure that your data is not disclosed to unauthorised third parties.

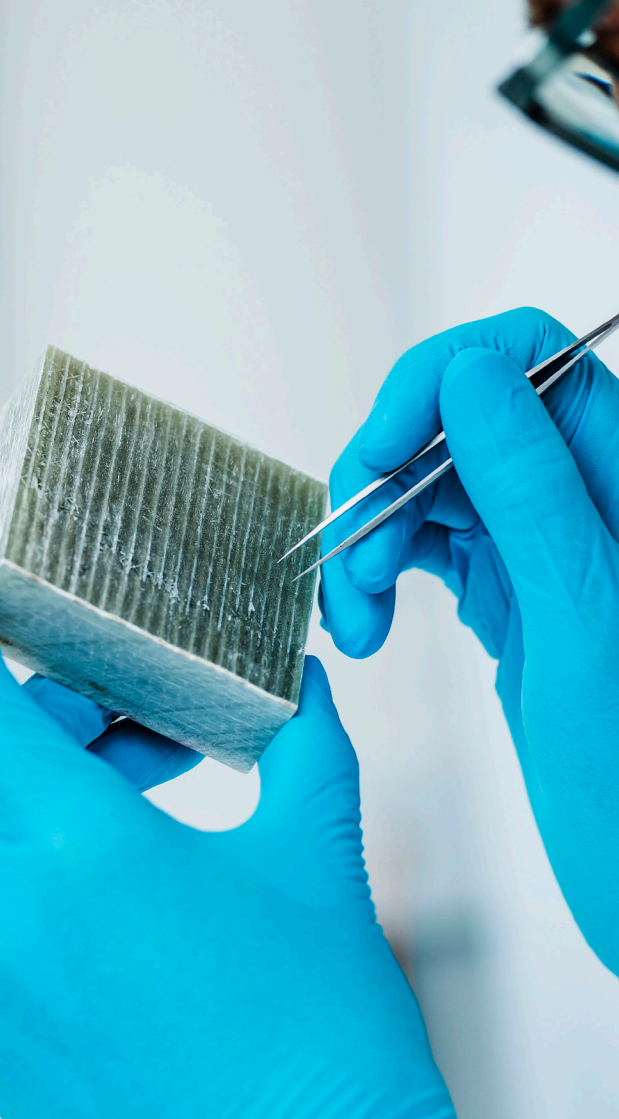
## 4.2 Transfer to third countries

- 4.2.1 Some of your data will be transferred to countries located outside the EU/EEA. This is because some of our data processors are located outside the EU/EEA.
- 4.2.2 Transfer of your personal data to processors outside the EU/EEA will take place either on the basis of EU standard contracts for the transfer of personal data to third countries or on the basis of the requirements of the Privacy Shield scheme or similar security regulations, thereby guaranteeing a sufficient level of protection.

## 4.3 Sharing

- 4.3.1 In the context of, among other things, wage management, wage reimbursement, occupational injury cases, etc. necessary data will be transmitted to relevant public authorities - e.g., to SKAT, municipalities, Udbetaling Danmark and Arbejdsmarkedets Erhvervssikring, as described above. In addition, we may share data about you to our occupational injury insurance company or other insurance companies if this is relevant and necessary for their processing of reported claims, etc.

The processing basis for the sharing of your data is either that it is necessary for us to comply with a legal obligation to those authorities or that it is necessary in order to comply with our obligations as laid down in other legislation or collective agreements. The legal basis is, respectively, Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (c) of the GDPR and Section 12 (1) of the Danish Data Protection Act, cf. inter alia, the Danish Withholding of Tax Act, Danish Act on Entitlement to Leave and



Benefits During Maternity Leave, the Sickness Benefit Act and the Act on Workplace Injury Insurance.

- 4.3.2 In addition, we also share data about you with your pension company. This happens in order for you to have your salary calculated and paid and for tax and funds to be paid to your pension company. Take a closer look in the section on pension, etc.

The basis of processing for sharing data to your pension company is that the processing of the data is necessary in order to fulfil the agreement you have entered into with the pension company. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (b) of the GDPR.

- 4.3.3 Your personal data may also be shared with our external lawyers for the purpose of performing a specific task. It may be, for example, if the Danish Technological Institute needs legal assistance in a case where you are involved and where the relevant personal data should therefore be used by our lawyer.

The basis of processing for the sharing of data with our lawyer will in that case be the balancing of interests rule, as we consider that the processing is necessary for us to pursue the legitimate interests to obtain legal assistance for a case in which you are involved as well as that it is necessary for a legal claim to be determined, exercised or defended. The legal basis is, respectively, Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR and Section 7 (1) of the Danish Data Protection Act, cf. Art. 9 (2) (f) of the GDPR.

#### **4.4 Disclosure**

- 4.4.1 On the Internet we record data about your name, job description, work phone number and email address. We will also post a picture of you on the internet if you consent to this. This happens so that our customers, etc. can easily find you if they need to contact you.

The processing basis for the publication of your data on the Internet is the balancing of interests rule, as we consider that the processing is necessary for us to pursue the legitimate interests of being able to disclose the data so that our customers can get in touch with you. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (f) of the GDPR.

- 4.4.2 If you have consented to this, images or video materials may be used in external information materials, including both in print and digital media. The legal basis is Section 6 (1) of the Danish Data Protection Act, cf. Art. 6 (1) (a) of the GDPR.



# 5 Dismissal/Resignation

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## 5.1 Information about your resignation/dismissal

5.1.1 In connection with your resignation/dismissal, data regarding termination of employment, including any date of resignation, termination, dismissal or expulsion, and relevant matters relating thereto will be recorded - e.g. the reason why you are no longer employed with us plus any charges, warnings, and recommendations. The registration is based, among other things, on the basis of our legal obligations, including so that we can inform you of the reason for dismissal.

The basis for the processing of data on termination of employment in connection with your resignation/dismissal is that the data may become necessary for a legal claim to be established, exercised or defended or that the processing is necessary for us to comply with an obligation as established by other legislation, etc. or to pursue a legitimate interest arising from other legislation, etc. The legal basis is Section 7 (1) of the Danish Data Protection Act, cf. Art. 9 (2) (f) of the GDPR and Section 12 (1) and (2) of the Danish Data Protection Act. Such legislation is, among other things, the provisions of the Danish Salaried Employees Act.

## 5.2 Information about email accounts

5.2.1 When you resign - or if you are laid off - network access to all systems, including your personal email account, Teams account, calendar, employee card, as well as task system and Dynamics will be terminated. Please refer to our IT Security policy for users, available on the Intranet, where this is further described.

## 5.3 Information about mobile phones, tablets, etc.

5.3.1 When you resign, delete private emails, text messages, MMSs, pictures and other private material from your delivered mobile phone and/or tablet, including logging out of your Apple ID. Please refer to our IT security for users where this is further described.





## 6 Storage restriction

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### 6.1 Erasure

- 6.1.1 We will keep your personal data throughout your employment and, generally, for up to five years after any termination with consideration for the fulfilment of public obligations and for use in any legal disputes. Your personal data will only be kept after the end of this 5-year period if a specific legal purpose requires this.
- 6.1.2 However, in some cases we will have an obligation to delete your personal data earlier. This applies, for example, if you withdraw your consent to a specific consent-based processing or if you believe that your data is no longer necessary for the purpose for which we obtained it.
- 6.1.3 When you contact us with a request to have your personal data rectified or erased, we will examine whether the conditions are met and, if this is the case, make amendments or deletions as soon as possible.
- 6.1.4 Please refer to our erasure and processing policy on recruitment and staff administration.

# 7 Your rights

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## 7.1 Disclosure obligation

7.1.1 The data protection legislation gives you different rights when we process personal data about you electronically. And the legislation imposes certain duties on us - such as telling you that we have collected or will collect personal data about you.

7.1.2 If, in particular cases, we process other personal data about you or carry out another form of processing than what we describe here, we will inform you separately. Special cases may be if we impose a staff sanction (e.g. a warning or dismissal) against you.

## 7.2 Insight, rectification, etc.

7.2.1 You also have the right to know what data about you we have gathered in connection with your employment, and you have the right to view the data. You have the right to request that we correct or erase data or restrict the processing of your data, for example, if you think it is incorrect or gives an incorrect impression. You also have the right to object to the processing we undertake with the balancing of interests rule as a basis for processing. We have a duty to make a decision on your request.

7.2.2 In certain circumstances, you have the right to data portability, which means that you have the right to receive personal data that you have provided to us in a structured, commonly used and machine-readable format.

7.2.3 If you have given your consent to the processing of your personal data, you always have the option to revoke this. However, we may continue to process the personal data that is not based on your consent.

## 7.3 Additional information

7.3.1 If you have questions about the above or your rights under data protection legislation, you can always contact the Danish Technological Institute at the following email: [asp@dti.dk](mailto:asp@dti.dk) or call: +45 72 20 20 06.

You can read more about the data protection legislation and your rights at the website of the Danish Data Protection Agency, [www.datatilsynet.dk](http://www.datatilsynet.dk). The Danish Data Protection Agency is the authority that can ultimately assess whether your personal data is being processed lawfully. You therefore have the opportunity to complain to the Danish Data Protection Agency if you disagree with our processing of your personal data.

The contact info of the Danish Data Protection Agency is:

**The Danish Data Protection Agency**

Borgergade 28, 5.

1300 Copenhagen K

Telephone +45 33 19 32 00

Email [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

If you have any questions regarding staff administration, you can contact:

**Annette Holst Vinther**

Email: [ahv@dti.dk](mailto:ahv@dti.dk)

- 7.3.2 Also, please refer to our policies, which also describe specific cases of processing of personal data, including the employee handbook, recruitment policy, user IT security as well as the erasure and processing policy concerning recruitment and staff management.



THIS PERSONAL DATA POLICY WAS LAST UPDATED ON 1 JUNE 2022.



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