

HR Privacy Policy

13. september 2022

Welcome to Salling Group A/S.

1. To whom does this privacy policy apply?

Salling Group A/S ("Salling Group", "we", "us" or "our") will collect and process personal data about you as part of your employment or internship with Salling Group in accordance with this privacy policy for employees and board members.

2. Where do we collect personal information about you?

Salling Group will collect and process personal data about you that is deemed necessary as part of the administration of your employment with Salling Group. We may collect personal information from the following sources:

- Directly from you
- From your colleagues
- From your previous employer
- From customers and suppliers
- Generated via our internal systems
- From video surveillance
- From RKI (credit banks) if your position requires it
- From educational establishments
- From the police in the form of your criminal record, if your position requires it
- From your doctor if you send a medical certificate
- From public authorities.

3. Purpose, types of personal data, legal basis and deletion

Salling Group has many different types of positions and opportunities to use employee apps. This means that Salling Group's processing of personal data will depend on the type of position you hold and which employee apps you use. You must therefore start by reading the column "Which employees are covered" to clarify whether the purposes in question, types of personal data, legal basis and deletion deadlines are relevant to you:

Which employees are covered?	For what purposes is the personal data used?	What types of personal information?	What is the legal basis for the treatment?	When is the personal data deleted?
All employees	General administration of your employment.	General personal data Employment contract. Personality test. Contact information (including private)	General personal data Article 6 (c) of the General Data Protection Regulation (performance of a contract).	Contact information and staff tests are stored for up to 12 months after resignation.

		<p>birthday, job title, educational background, nationality, professional background (incl. Internal employment history), emails, chats, bank account details, current employment information (time registration, holidays, sick days, pension, insurance, and leave), emergency contact, nationality, duties, maternity leave, staff development interviews or PPM interviews, responsibilities, absence disciplinary measures, warnings as well as information related to dismissal, and termination.</p> <p>If you are a foreign employee, we can also process information about your work and residence permit.</p> <p>Health information Only in special cases in connection with reimbursements and work injuries.</p> <p>Social security number</p>	<p>Data Protection Act Section 12 (1) - (2) (necessary to comply with labor law obligations and collective agreements).</p> <p>Article 6 (c) of the General Data Protection Regulation (legal obligation, including in accordance with the tax legislation, the Sickness Benefit Act and the Accounting Act).</p> <p>Health information The Data Protection Act, section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements).</p> <p>Article 9 (2) (b) of the General Data Protection Regulation cf. the Sickness Benefit Act (employment law obligations).</p> <p>Social security number The Data Protection Act, section 11 (2) (i) (when this is a legal requirement, including in accordance with the tax legislation, the ATP Act and the Holidays Act).</p>	<p>Certain information such as medical certificates and warnings are deleted on an ongoing basis during employment.</p> <p>Other information is stored for up to 72 months from the resignation of the employee.</p>
All employees	Video surveillance for the purpose of preventing crime,	General personal data Your behavior and	General personal data Article 6 (e) of the General Data Protection	Recordings from video surveillance made for crime prevention

	<p>processing occupational injuries and surveillance of production and storage to ensure security and compliance with applicable legal requirements.</p>	<p>workflows via video surveillance.</p> <p>Health information In special cases, information about your health can be inferred (eg if you are involved in a serious accident).</p> <p>Criminal information Violations of the Penal Code via the recordings (eg theft).</p>	<p>Regulation (interest of society), Article 6 (f) (legitimate interest in preventing crime, ensuring security and paying compensation, etc.), Article 6 (c) of the General Data Protection Regulation.</p> <p>Health information Article 9 (2) (f) of the General Data Protection Regulation (legal requirements).</p> <p>Criminal information The Data Protection Act section 8 (3) (legitimate interest).</p>	<p>purposes will be deleted or anonymized within 21 days of the recording, unless it is necessary for Salling Group to store the recordings for the purpose of handling a specific dispute, eg in connection with solving an offense or assessing a compensation case.</p>
All employees	<p>Payment and calculation of salary, pension, reimbursement in relation to sick leave, registration and administration of maternity leave and health schemes, registration of registered and held courses, subsidies for special schemes and payment of holiday pay and registration of holidays.</p>	<p>General personal data Name, contact information (including private), salary, account number, courses held, grants, reimbursement, holidays, maternity information, and medical certificates.</p> <p>Health information Only for reimbursements in accordance with section 56 of the Sickness Benefit Act. Medical certificates do not contain health information.</p> <p>Social security number</p>	<p>General personal data The Data Protection Act section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements).</p> <p>Article 6 (b) of the General Data Protection Regulation (performance of a contract).</p> <p>Article 6 (c) of the General Data Protection Regulation (legal obligation, including in accordance with the tax legislation, the Sickness Benefit Act and the Accounting Act).</p> <p>Health information The Data Protection Act, section 12 (1) – (2)</p>	<p>Up to 72 months from resignation.</p> <p>Accounting material is stored for up to 72 months from the end of the financial year.</p>

			<p>(necessary to comply with labor law obligations and collective agreements).</p> <p>Article 9 (b) of the General Data Protection Regulation cf. the Sickness Benefit Act (employment law obligations).</p> <p>Social security number The Data Protection Act, section 11 (2) (i) (when this is a legal requirement, including in accordance with the tax legislation, the Maternity Act, the ATP Act, the Holidays Act and the Sickness Benefit Act).</p>	
All employees	Marketing via intranet, websites and social media.	General personal data Name, position, videos, and photos.	<p>General personal data Article 6 (a) of the General Data Protection Regulation (consent).</p> <p>Article 6 (f) of the General Data Protection Regulation (legitimate interest in sharing your image on the intranet as well as in situations where you are not prominent in the image).</p>	Salling Group strives to take down all external images and videos where you appear in connection with your termination or when revoking your consent, if this is the relevant legal basis.
All employees	Establish, defend and assert legal claims as a result of your employment relationship, including in relation to work injuries, violations of the law and your employment contract. To use this,	General personal data Only necessary and relevant general information will be processed on the basis of the case in question, including your emails, activity	<p>General personal data Article 6 (e) of the General Data Protection Regulation (performance of a task in the interest of society).</p> <p>Article 6 (f) of the</p>	5 years from resignation or in connection with the end of the case.

	<p>you may need to review your emails and websites used if you are in possession of a computer or telephone. Legal claims may also arise on the basis of reports via the whistleblower scheme.</p> <p><i>Salling Group has developed a separate privacy policy for the whistleblower scheme.</i></p>	<p>logs, IP address, video recordings from video surveillance and websites visited, where applicable.</p> <p>Health information and trade union affiliations Processed only if necessary and relevant to the case in question, including on the basis of video recordings.</p> <p>Criminal information Process only if necessary and relevant to the case in question. It can e.g. be the case in case of theft in shops or other acts in violation of criminal law, including illegal acts captured via video recordings.</p>	<p>General Data Protection Regulation (e-mails may be processed and reviewed on the basis of legitimate interest, which consists of uncovering suspicious matters).</p> <p>Data Protection Act section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements).</p> <p>Health information The Data Protection Act, section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements).</p> <p>Article 9 (2) (f) of the General Data Protection Regulation (legal requirements).</p> <p>Criminal information The Data Protection Act, section 8 (3) (legitimate interest that clearly exceeds your interest in us not processing the information).</p>	
<p>All employees</p>	<p>Training and development of employees, including also on the basis of employee satisfaction surveys and MU / feedback interviews with a view to improving the working</p>	<p>General personal data Contact information, SAP ID, results of training, skills, general performance, background / education, feedback</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation (performance of a contract).</p> <p>Article 6 (f) of the General Data Protection</p>	<p>Up to 72 months from resignation.</p> <p>Information about MUS and performance results is deleted continuously.</p> <p>Accounting records is deleted after 72 months</p>

	environment, preventing stress, illness, developing and optimizing employees, products and services.	and responses to employee satisfaction surveys. Health information Cannot be excluded via MU / PPM interviews.	Regulation (legitimate interest in being able to develop employees and receive feedback on the basis of surveys in order to improve products, services and employees at Salling Group as well as to prevent stress, illness, and improve the working environment). Health information The Data Protection Act, section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements). Article 9 (1) of the General Data Protection Regulation Article 6 (b) and Article 6 (c) of the General Data Protection Regulation (labor law obligations).	from the end of the financial year.
All employees	Analysis and statistics on employees, including employee absence and standard reporting to the Board of Directors with the overall purpose of ensuring the correct employee strength at Salling Group, to see if the goals from the year have been achieved, to see how employees generally perform and whether it should result in employment law consequences.	General personal data Contact information, salary, gender, seniority, sick leave, SAP ID, absence hours, result of training, bonuses, performance, and reason for absence (without indication of eg specific illness).	General personal data Article 6 (b) of the General Data Protection Regulation 1 (performance of a contract). Article 6 (f) of the General Data Protection Regulation (legitimate interest in ensuring the correct staffing, risk management, changing goals, preparing reports, and changing the organization).	5 years from resignation. Accounting records is deleted after 72 months from the end of the financial year.

<p>All employees</p>	<p>Termination by Salling Group and conclusion of severance agreement.</p>	<p>General personal data Contact information, any warnings, salary, and general description of the termination.</p>	<p>General personal data The Data Protection Act, section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements). Article 6 (b) of the General Data Protection Regulation (performance of a contract). Article 6 (c) of the General Data Protection Regulation (legal obligation).</p>	<p>Up 72 months from resignation. Accounting records is deleted after 72 months from the end of the financial year.</p>
<p>All employees</p>	<p>Establish and point out responsibilities in relation to the working environment in order to comply with legal requirements as well as the preparation of workplace assessments (APVs).</p>	<p>General personal data Store, contact information, course certificates, district, content of APV (if personally identifiable) time registration and SAP number. Health information Cannot be ruled out.</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation 1 (b) (performance of a contract). Data Protection Act section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements). Article 6 (c) of the General Data Protection Regulation, subsection (legal obligation). Health information Data Protection Act section 12 (1) – (2) (necessary to comply with labor law obligations and collective agreements).</p>	<p>All information from the APV survey will be deleted upon termination. Information about the occupational health and safety representative is deleted when he or she no longer holds the position.</p>

			Article 9 (2) (b) subsection of the General Data Protection Regulation and the General Data Protection Regulation, article 6 (c) (labor law obligations).	
All employees	Business Intelligence (BI) for the preparation of statistics and analyses.	General personal data Name, contact details, holidays, sick days, pension, insurance, salary, absence and other key figures for employees.	General personal data Article 6 (f) of the General Data Protection Regulation, subsection (legitimate interest in preparing statistics and analyzes with a view to improving products and services, quality assurance, ensuring the correct number of employees and reporting to the management and board of directors).	Data is pseudonymised 5 years after resignation", then it should correctly state that "Data is pseudonymised on an ongoing basis and anonymised 5 years after the employee's resignation. Data is then deleted 72 months after the employee's resignation.
All employees and board members	Issue company cards and give discounts.	General personal data Contact information, discounts, purchase history and financial information.	General personal data Article 6 (b) of the General Data Protection Regulation, subsection (performance of a contract). Article 6 (f) of the General Data Protection Regulation (legitimate interest in processing personal data about you so that you can obtain the discount in question).	Up to 72 months from termination of employment. Accounting records is stored for up to 72 months from the end of the financial year.
Board members	Administration of the board of directors and payment of fees.	General personal data Name, address, phone number, email, payments, bank account, and pension information.	General personal data Article 6 (b) of the General Data Protection Regulation (performance of a contract). Article 6 (c) of the General Data Protection	Up to 72 months from resignation as a board member. Accounting material is stored for up to 72 months from the end of the financial year.

			Regulation (legal obligation, including in accordance with tax legislation, and the Accounting Act).	
Employees with special financial and budgetary responsibilities	Ongoing single lookup in RKI (mortgage credit institution) to see if the employee is registered in it and, if so, the assessment of whether it may have employment law consequences.	<p>General personal data Contact information and information appearing in RKI.</p> <p>Social Security number Only in certain cases that this is necessary.</p>	<p>General personal data CPR-number Article 6 (b) of the General Data Protection Regulation (performance of a contract). However, consent is obtained if the employee's CPR number is used to be able to check the employee in RKI, cf. the Data Protection Act, section 11 (2) (ii)</p>	<p>Information obtained is deleted immediately after assessment of whether the information is compatible with employment.</p> <p>In some cases, the information is stored for a longer period of time if a specific agreement has been entered into on matters that must be rectified within an agreed time limit.</p>
Employees where required under the position	Obtaining a criminal record to ensure that the employee has not been previously punished and thus that there is no risk of abuse of the position. Only relevant matters in the criminal record are assessed according to the position in question.	<p>General personal data Contact information and clean criminal record</p> <p>Criminal offenses Only if the criminal record is tainted.</p>	<p>General personal data Article 6 (a) of the General Data Protection Regulation (consent).</p> <p>Criminal offenses The Data Protection Act, section 8 (1) (i) (consent).</p> <p>***</p> <p><i>Salling Group obtains statements of consent via the Police's safe procedure. The employee agrees to Salling Group's obtaining a criminal record and any processing of information about criminal offenses via the Police's statement of consent, which the employee receives via e-Boks.</i></p>	Criminal records are kept for as long as assessment of these is ongoing.

Employees with company cars	Administration of a company car as a staff benefit.	General personal data Contact details, account number and driving license number.	General personal data Article 6 (b) of the General Data Protection Regulation, subsection (performance of a contract).	Up to 72 months from termination of employment.
Bonus-eligible employees	Payment and evaluation of bonuses.	General personal data Contact information, SAP ID, performance, job grade, current salary, assessment of the employee, performance score for the last 12 months and rating.	General personal data Article 6 (b) of the General Data Protection Regulation, subsection (performance of a contract).	Up to 72 months years from the resignation of employment. Accounting records is stored for up to 72 months from the end of the financial year.
Trainees	Ensure the legal requirements in connection with students in cooperation with the school.	General personal data Contact information, place of study/course, education level/step.	General personal data Article 6 (b) of the General Data Protection Regulation, (performance of a contract).	Deleted immediately after the end of the training period or up to 72 months after the end of employment.
Former employees	In connection with the termination, Salling Group can in certain cases help the former employees to get a new job in another company.	General personal data Contact information, CV and skills.	General personal data Article 6 (f) of the General Data Protection Regulation, (legitimate interest in helping the employee get a new job).	After delivery of material to a new employer, the information is deleted.
Interns and coordinators	Invoicing and bookkeeping of mentor funds.	General personal data Contact information and salary.	General personal data Article 6 (b) of the General Data Protection Regulation, (performance of a contract).	Stored for up to 72 months from the end of the financial year.
Warehouse employees	Register and check employees' working hours (arrival/departure times).	Biometric data In the form of fingerprints. (This is being phased out)	Biometric data Article 9 (2) (a) of the General Data Protection Regulation (consent).	In connection with resignation or employment in a position other than a warehouse position.
Customer service employees	Recording of telephone conversations in customer service for the purpose of training and development of employees.	General personal data Name and conversation with the customer.	General personal data Article 6 (f) of the General Data Protection Regulation, (legitimate interest in improving the business's customer	Deleted after 6 months.

			service and developing employees' skills).	
<p>Logging of employees' arrival/departure times</p>	<p>Register and check employees' working hours (arrival/departure times)</p>	<p>General personal data Name, employee ID and working time.</p>	<p>General personal data Article 6 (f) of the General Data Protection Regulation (legitimate interest in ensuring that remuneration for working time corresponds to registered time) and Article 6 (b) of the General Data Protection Regulation (performance of a contract)..</p>	<p>Stored for up to 72 months after the end of the financial year.</p>
<p>Logging of employees' access to locations</p>	<p>In order to ensure that only the person concerned is allowed to get access to the location. In some cases, the information can be used to check the employees' working hours (arrival/departure times) in connection with disputes.</p>	<p>General personal data Name, employee ID and working time.</p>	<p>General personal data Article 6 (f) of the General Data Protection Regulation (legitimate interest in ensuring that only relevant employees have access to the location).</p>	<p>Stored for up to 6 months.</p>
<p>Employees who use the performance app "Relesys".</p> <p><i>A separate privacy policy has also been drawn up for the App, which you must accept separately.</i></p>	<p>Communication and assessment of performance.</p>	<p>General personal data Contact information, login information, comments, chats, training results, skills, and general performance.</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation, (performance of a contract). Article 6 (f) of the General Data Protection Regulation, (legitimate interest in being able to develop employees and receive feedback based on surveys with a view to improving products, services and employees</p>	<p>Stored for up to 30 days from termination of employment.</p>

			at Salling Group and to prevent stress, illness and improve the working environment).	
Employees who use the "SafeAllDay" App	Recording of safety observations at the warehouse.	General personal data Working hours, name and locations of work.	General personal data Article 6 (f) of the General Data Protection Regulation, (legitimate interest in observing safety at the workplace and then implementing the necessary measures). Article 6 (c) of the General Data Protection Regulation, (legal obligation according to the Working Environment Act).	5 years from resignation from employment.
Next of kin	Contact the next of kin, e.g. in the event of an acute illness or in other emergency situations. Salling Group encourages you to inform the next of kin that you have registered their contact details at Salling Group.	General personal data Contact Information.	General personal data Article 6 (f) of the General Data Protection Regulation, (legitimate interest in being able to contact them, e.g. in the event of acute illness or accident).	In connection with the end of employment.

4. Withdrawal of consent

You can revoke any consents you have given as part of your employment with Salling Group at any time. Withdrawal of a consent will have an effect on the future processing of your personal data. Revocation of your consent thus does not affect the legality of the processing we carried out on the basis of consent, before the revocation. If you wish to revoke a consent, you can contact us as indicated below.

5. To whom do we pass on your personal data?

In certain cases, Salling Group is contractually or legally obliged to pass on personal data about you to third parties who become independent data controllers for your personal data. In the following table, we have indicated the categories of these third parties, which personal data about you may be passed on to the third parties and the legal basis for the passing on:

Categories of recipients	Types of personal data	Legal basis
Immigration authorities	<p>General personal data Contact details, visa and work permit (if you are a foreign employee).</p>	<p>General personal data The Data Protection Act Section 12 (1) (necessary to comply with labor law obligations).</p> <p>Article 6 (c) of the General Data Protection Regulation (legal obligation).</p>
Financial institutions	<p>General personal data Contact information and date of birth.</p> <p>Social Security number</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation (performance of a contract).</p> <p>Article 6 (c) of the General Data Protection Regulation (legal obligation).</p> <p>Social Security number Section 11 (2) (i) of the Data Protection Act (statutory requirement).</p>
Tax authorities	<p>General personal data Contact information, salary, account information, vacation, illness, insurance, maternity information, bonuses, and work permit (if you are a foreign employee).</p> <p>Social Security number</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation, subsection (performance of a contract).</p> <p>The Data Protection Act Section 12 (1) – (2) (necessary to comply with labor law obligations).</p> <p>Article 6 (c) of the General Data Protection Regulation (legal obligation, including according to tax legislation).</p> <p>Social Security number Section 11 (2) (i) of the Data Protection Act (statutory requirement).</p>
Travel agencies, airlines, car rental companies and leasing companies.	<p>General personal data Name, private address, company e-mail, company phone, date of birth and driving license number when renting a car.</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation (performance of a contract).</p> <p>Article 6 (f) of the General Data Protection Regulation (legitimate interest in being able to assist employees in making bookings).</p>
Pension and insurance companies	<p>General personal data Contact information, bank information, pension information, video recordings,</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation (performance of a contract).</p>

	<p>sick days, insurance, maternity information, salary, bonuses, and other benefits received.</p> <p>Health information Only in the case of serious occupational injuries. Can also appear as a result of video recordings.</p> <p>Social Security number</p>	<p>Article 6 (e) of the General Data Protection Regulation (interest of society).</p> <p>Article 6 (f) of the General Data Protection Regulation (legitimate interest with a view to paying out amounts).</p> <p>Health information Article 9 (2) (f) of the General Data Protection Regulation (legal requirements).</p> <p>Social Security number Section 11 (2) (iv) of the Data Protection Act cf. the General Data Protection Regulation, article 9 (2) (f) (legal requirements).</p>
The local authority	<p>General personal data Contact details, bank details, information on employment, salary, bonuses and other benefits received.</p>	<p>General personal data Article 6 (c) of the General Data Protection Regulation (legal obligation).</p>
DA-Maternity	<p>General personal data Contact information, bank information, pension information, sick days, insurance, maternity information, salary, bonuses and other benefits received.</p> <p>Social Security number</p>	<p>General personal data The Data Protection Act Section 12 (1) (necessary to comply with labor law obligations).</p> <p>Article 6 (c) of the General Data Protection Regulation (legal obligation).</p> <p>Article 6 (b) of the General Data Protection Regulation (performance of a contract)..</p> <p>Social Security number Section 11 (4) (iv) of the Data Protection Act cf. the General Data Protection Regulation, article 9 (2) (f) (legal requirements).</p> <p>Section 11 (2) (i), subsection of the Data Protection Act (statutory requirement).</p>
Udbetaling Danmark (Payment Denmark)	<p>General personal data Contact information and salary information.</p> <p>Social Security number</p>	<p>General personal data Article 6 (c) of the General Data Protection Regulation (legal obligation).</p> <p>Social Security number Section 11 (2) (i) of the Data Protection Act (statutory requirement).</p>

<p>Lawyers, authorities, the police and courts</p>	<p>General personal data, health information and Social Security number Relevant information in relation to a specific dispute, including in certain cases video recordings that may contain health information and your CPR number when this is necessary.</p> <p>Social Security number</p>	<p>General personal data Article 6 (e) of the General Data Protection Regulation (interest of society).</p> <p>Health information Article 9 (2) (f) of the General Data Protection Regulation 2 (legal requirements) cf. the General Data Protection Regulation, article 6 (e) (interest of society).</p> <p>Social Security number Section 11 (2) (iv) of the Data Protection Act cf. the General Data Protection Regulation, article 9 (2) (f) (legal requirements).</p>
<p>Unemployment funds and trade unions</p>	<p>General personal data Contact information, salary, account information and other relevant personal information and in special cases health information for use in a specific case.</p> <p>Social Security number</p>	<p>General personal data Article 6 (b) of the General Data Protection Regulation (performance of a contract).</p> <p>The Data Protection Act Section 12 (1) – (2) (necessary to comply with labor law obligations).</p> <p>Article 6 (c) of the General Data Protection Regulation (legal obligation, including according to tax legislation).</p> <p>Social Security number Section 11 (2) (i), subsection of the Data Protection Act (statutory requirement).</p>
<p>Labor market education and training providers</p>	<p>General personal data Labor market education and training providers</p>	<p>General personal data Article 6 (f) of the General Data Protection Regulation (legitimate interest in ensuring the correct education)</p>
<p>Arbejdsmarkedets Erhvervssikring (Occupational insurance for the labor market) in connection with occupational diseases</p>	<p>General personal data Incident description of work routines, salary and employment conditions and contact information.</p> <p>Health information</p> <p>Social Security number</p>	<p>General personal data Article 6 (e) of the General Data Protection Regulation (interest of society)</p> <p>Health information Article 9 (2) (f) of the General Data Protection Regulation (legal requirements).</p> <p>Social Security number Section 11 (2) (iv) of the Data Protection Act cf. the General Data Protection Regulation, article 9 (2) (f) (legal requirements).</p>

Leverandører af produkter og ydelser	General personal data Name, work email and phone number	Article 6 (f) of the General Data Protection Regulation (legitimate interest in ensuring that suppliers have the necessary contact information and ensuring employee access to relevant systems)
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6. Who do we entrust your personal data to?

Suppliers (third parties) can gain access to your personal data on the basis of a contractual relationship with Salling Group when they deliver relevant services to Salling Group, such as the administration of salaries, outlays and other information about compensation, IT hosting, security companies, providers of video surveillance solutions, maintenance, performance of satisfaction surveys and technical suppliers of employee apps. Such suppliers (data processors) will only process personal data on the basis of a data processor agreement and in accordance with our instructions.

7. Do we transfer your personal data to insecure third countries?

If your personal data is transferred to data processors established in countries outside the EU/EEA, cf. point 6 above, who do not have a sufficient level of protection, such a transfer will be based on the EU Commission's standard contracts.

You have the right to write to Salling Group as set out below in order to receive a copy of the standard contracts entered into for the relevant data processor or sub-processor. Salling Group does not pass on personal data to data controllers in countries outside the EU/EEA that do not have a sufficient level of protection, cf. point 5 above.

8. Video surveillance

Salling Group has installed approx. 18,000 surveillance cameras in both shops, warehouses and own locations. The video-monitored areas are clearly marked by signage and are regulated by separate policies.

The purpose of the video surveillance is crime prevention, treatment of occupational injuries and monitoring of production and storage to ensure safety and compliance with applicable legal requirements, cf. the General Data Protection Regulation, article 6 (e) (interest of society), the General Data Protection Regulation article 6 (f) (legitimate interest in preventing crime, ensuring safety and paying compensation, etc.), the General Data Protection Regulation article 6 (c) (legal obligation), the Data Protection Act section 8 (3) (for criminal offences) and the General Data Protection Regulation, article 9 (2) (f) (legal requirements for health information).

Recordings will only be accessed if criminal acts are suspected, in the event of work injuries, violation of internal guidelines or in the event of internal/external audits. The recordings may be passed on to the police for crime-solving purposes, if this is done to serve public or private interests that clearly exceed consideration for the interests that justify secrecy, cf. section 8 (4) of the Data Protection Act, or if the disclosure is subject to legal requirements. If it is necessary to disclose the recordings for purposes other than those mentioned above, we will request your consent to such disclosure if you are included in the recordings.

The recordings are stored on a secure server to which only a limited number of employees have access.

Images and video from the video surveillance are followed in real time by selected trusted employees and guards.

Recordings from video surveillance made for the purpose of crime prevention are deleted or anonymized no later than 21 days after the recording, unless it is necessary for Salling Group to store the recordings for the purpose of handling a specific dispute, e.g. in connection with solving an offence.

Salling Group may need to store recordings from video surveillance in order to be able to document other circumstances, such as an occupational injury or the like. These recordings will be deleted when there is no longer a purpose for the storage.

9. What are your rights?

General rights

When Salling Group processes personal data about you as set out above, you have a number of rights under data protection legislation:

- a. You have the right to obtain an insight into and a copy of the personal data that Salling Group processes about you, subject to certain statutory exceptions.
- b. You have the right to have personal data rectified that has become outdated and/or is incorrect.
- c. You have the right to have the processing of your personal data deleted or restricted, unless Salling Group is entitled or legally obliged to continue the processing, including as a result of the Accounting Act, tax legislation, or ongoing legal proceedings and in the event that it is an employment law or contractual requirement to process personal data.
- d. In certain cases, you have the right to be provided with the personal data that Salling Group has registered about you in a structured, commonly used and machine-readable format and to ask Salling Group to transmit this personal data to another data controller (data portability).

9.1 **Right to object**

You always have the right to object to the collection and to the further processing of your personal data, including the right to object to our processing on the basis of the balancing of interests rule according to Article 6 (f) of the General Data Protection Regulation.

Required information according to your employment contract and the law

Salling Group notes that the processing of a large number of your personal data in the form under point 2 above is legally or contractually necessary as a prerequisite for us to comply with the law and to be able to administer. Refusal to provide this information, objection to our processing of this information or demand for the deletion of this information could therefore mean that you cannot maintain your position as an employee at the Salling Group. You will of course be informed of this in connection with a request, and it will therefore have no consequences for you to exercise your rights vis-à-vis Salling Group.

10. Do you have questions and want to exercise your rights?

The following legal entity is responsible for the processing of your personal data:

Salling Group A/S
CVR-nr. 35954716
Rosbjergvej 33
8220 Brabrand
Danmark

If you would like to exercise any of your rights, if you have any questions about this privacy policy or the processing of your personal data, you can call the HR hotline on 87785200 or write to us at hrhotline@sallinggroup.com. You can find more information here: <https://hrgdpronly.sallinggroup.com/hc/da>

If you wish to complain about our processing of your personal data, please contact us. You can also lodge a complaint with the Danish Data Protection Authority, Carl Jacobsens Vej 35, 2500 Valby, telephone 33 19 32 00, e-mail dt@datatilsynet.dk

11. Changes to the Privacy Policy

This privacy policy does not constitute an agreement between Salling Group and you, but instead forms the basis of our obligation to provide information under data protection legislation. We reserve the right to make changes to this privacy policy from time to time in accordance with applicable data protection legislation. In case of changes, the date at the top of the privacy policy will be changed. The privacy policy applicable at all times will be available on the intranet and will always be available by contacting the HR hotline. In case of significant changes to the privacy policy, you will either receive an e-mail or a message via the intranet with reference to the updated privacy policy.