

PRIVACY POLICY

DRAGSBÆK A/S

including the following brands: Dragsbæk, Pastella, Bakkedal and AMA

This Privacy Policy describes how Dragsbæk A/S ("Dragsbæk", "we", "our", or "us") processes your personal information according to your relationship with Dragsbæk. You are encouraged to read this privacy policy carefully.

1. DATA CONTROLLER

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

Dragsbæk A/S

CVR (Company Registration) No. 89 31 87 18

Simons Bakke 46

7700 Thisted

Denmark

Email: gdpr@dragsbaek.dk

Phone number: +45 33 18 75 10

2. DESCRIPTION OF THE PROCESSING

Purpose	Categories of personal data	Sources of the personal data	Legal bases for the processing	Recipients	Data retention
WHEN YOU VISIT DRAGSBÆK's WEBSITE					
<p><u>Business development and optimization of user experience and website:</u></p> <p>When you visit our website, your personal data are collected, e.g. through the use of cookies. We make use of such information in order to optimize the user experience on our websites; to optimize the services offered by us; and to compile statistics relating to the use of our website. For more details see our Cookie Policy.</p> <p>Third-party cookies are also used, i.a. to remember your settings; for traffic measurement; to show you targeted advertisements; to track your use of the website; and for statistical purposes. For these types of processing, Dragsbæk will in some cases be a joint controller with the provider of the third-party cookie(s). You can read more about this, and also find links to the relevant third parties' own privacy policies in the cookie overview in Dragsbæk's Cookie Policy under "Cookies" at the bottom of the website.</p> <p>You may at any time withdraw or change your consent by opting-out cookies in the cookie overview, just as you can block cookies in your browser.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>IP address and information about your IT equipment (such as browser, operating system and MAC address) as well as information about your behaviour, including your use of our website</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> • Directly from you through your use of our website. 	<p>We process your personal data as described on the following legal basis:</p> <ul style="list-style-type: none"> • Article 6.1.f (necessary for the pursuit of our legitimate interest in operating and optimizing our website, as well as business and product development). 	<p>We share your personal data with:</p> <ul style="list-style-type: none"> • Business partners, including IT suppliers and support, with whom we work to assist our business • Group entities 	<p>Information about your use of our website, etc. is retained for up to two years. The exact retention period depends on the individual cookie.</p> <p>See also our Cookie Policy.</p>

WHEN YOU PURCHASE OUR POSTERS					
<p><u>Sale of posters</u></p> <p>We process your personal data in connection with the sale of our posters to you.</p> <p>We use such data to execute your order and dispatch it to you.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, private address, email address, telephone number, and payment information.</p> <p>Additionally, in cases where the delivery address is different from the billing address, the same personal data are collected about the recipient of the package.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> • Directly from you • From the person placing the order on your behalf 	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> • Article 6.1.b (necessary for the performance of a contract with our customers). • Article 6.1.c (necessary to comply with our legal obligations, including the Danish Bookkeeping Act). • Article 6.1.f (necessary for the pursuit of our legitimate interest in entering into agreements for the sale of goods from our webshop, despatching them to the recipient, as well as customer service in this regard). 	<p>We share your personal data with:</p> <ul style="list-style-type: none"> • Business partners, including IT suppliers and support, with whom we work to assist our business • Carriers 	<p>As a main rule, the information will be retained for five years as from the end of the year in which the purchase/payment has taken place, cf. the Danish Bookkeeping Act in this regard.</p> <p>However, we may retain the personal data for an extended period if deemed necessary in a specific case, especially if required for establishing or defending legal claims or exercising such claims, e.g. in connection with a complaint.</p>
WHEN YOU MENTION OR INTERACT WITH DRAGSBÆK ON THE INTERNET, INCLUDING SOCIAL MEDIA					
<p><u>Use of the internet, especially social media:</u></p> <p>Your personal data are collected when you visit our pages on social media, when you tag, recommend or mention us, our brands and products on the internet, including on social media, and when you communicate with us in this context.</p> <p>We have profiles on Facebook, Google My Business, LinkedIn, and YouTube.</p> <p>We also make use of providers of media monitoring to monitor any comments regarding our company, products and brands on the internet,</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, profile picture, username, contents of posts related to Dragsbæk, the information that can be deduced from your social-media profile and your behaviour, as well as any information you choose to give us in connection with our interaction.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> • Directly from you • Social media • Media monitoring providers 	<p>We process your personal data as described on the following legal basis:</p> <ul style="list-style-type: none"> • Article 6.1.f (necessary for the pursuit of our legitimate interest in marketing, keeping track of publicity regarding us and our products, and communicating with our customers and followers on social media). 	<p>We share your personal data with:</p> <ul style="list-style-type: none"> • Business partners, including IT suppliers and support, with whom we work to assist our business • Group entities • Social media 	<p>Deletion of personal data that we receive in connection with your communication with us on social media depends on the contents of the communication, see the other retention periods specified in this Privacy Policy.</p> <p>As a main rule, inquiries received through social media are deleted when the processing is completed.</p> <p>However, comments and similar public reactions on our profiles and social media posts are generally</p>

<p>including on social media - and we regularly receive reports on such comments.</p> <p>We especially use Facebook for marketing on social media, and together with Facebook we are joint data controller for the collection of personal data about you when you visit our Facebook page. You can read more in the agreement on joint data controllership here.</p> <p>Your personal data are also processed as described in Facebook's cookie and privacy policy.</p>	<p>We generally process personal data about you when you visit our profiles on social media and communicate with us through these, e.g. questions in connection with a direct inquiry from you to us on Facebook.</p> <p>Regarding the purpose in this respect, please also see the section regarding your contact with Dragsbæk in your capacity of end customer, including customer service.</p>				<p>not deleted - unless you choose to delete them yourself.</p> <p>Reports regarding the mention of Dragsbæk, our brands and products are deleted within a year after the report was generated.</p> <p>Additionally, the personal data on social media, such as Facebook and Instagram, will be retained by the social media services as described in their own privacy policies.</p>
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WHEN YOU HAVE A RELATION TO DRAGSBÆK AS AN END CUSTOMER (CONSUMER)

<p><u>Customer service, customer inquiries, claims and complaints:</u></p> <p>We process your personal data in connection with ongoing customer service and responding to customer inquiries, including processing claims and complaints about our products, both food products and posters.</p> <p>In addition, we process your personal data for the purpose of ordinary business operations, e.g. product development, quality assurance of our production, products and food safety, as well as for general communication purposes.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, possibly username, email address, private address, telephone number and information that you may choose to submit to us in connection with your inquiry.</p> <p>In connection with claims and complaints, additional information is processed about your bank account details for the purpose of reimbursement, as well as information regarding your experience/reason for the complaint.</p> <p>We also process any pictures that you may send to us in connection with questions,</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> • Directly from you • From the store/customer to whom you may have sent a complaint or a claim, which has subsequently been forwarded to us • Group entities 	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> • Article 6.1.b (necessary for the performance of a contract). • Article 6.1.c (necessary to comply with our legal obligations in connection with the handling of claims and complaints, quality assurance of our food production, and the retention of accounting records, etc.). • Article 6.1.f (necessary for the pursuit of our legitimate interest in customer service, responding to customer inquiries, business and product development, 	<p>We share your personal data with:</p> <ul style="list-style-type: none"> • Business partners, including IT suppliers and support, with whom we work to assist our business • Suppliers in connection with handling an inquiry, claim or complaint • Group entities • Social media if we communicate through such media 	<p>As a main rule, we will retain ordinary inquiries from you for one year as from the date of our response to your inquiry.</p> <p>If the inquiry leads to an inspection or quality control of our products, the inquiry is kept until the inspection or quality control has been concluded.</p> <p>However, if we reimburse an amount due to a claim or complaint, personal data from the accounting records will be retained for up to five years from the end of the year in which the reimbursement occurred, in accordance with the rules of the Danish Bookkeeping Act.</p> <p>Personal data may be retained for a longer period if there are specific reasons for doing so, especially if it is necessary for establishing or defending a legal</p>
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	<p>claims and complaints, and the like.</p> <p><u>Sensitive personal data:</u></p> <p>In special cases, we may process personal data concerning your health if you choose to submit such information to us in connection with a customer inquiry. However, such information is deleted as soon as possible, and you are encouraged to consult your own physician instead.</p> <p>Additionally, we may process personal data concerning your health in connection with claims and complaints about our products, to the extent that you choose to provide such information.</p>		<p>quality assurance of our production, products and food safety, establishing and maintaining contact and communication with our end customers, as well as handling claims and complaints).</p> <ul style="list-style-type: none"> • Article 9.2.f (necessary for the establishment, exercise or defence of legal claims - if you send us personal data concerning your health in connection with a claim or complaint). 		<p>claim or exercising such claim, for instance in connection with a complaint.</p>
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WHEN YOU ARE EMPLOYED WITH OR HAVE A RELATION TO DRAGSBÆK'S CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

<p><u>Business operations:</u></p> <p>We process your personal data as part of our ordinary business operations, including purchases, production, quality assurance, sale and distribution of Dragsbæk's products, invoicing, as well as other contacts with suppliers, business partners and customers.</p> <p>We will in this connection process your personal data in case you are employed with or have a relation to one of Dragsbæk's customers, suppliers or business partners.</p> <p>We collect such personal data when you act on behalf of your employer and as your employer's contact person, e.g. when entering</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, email address, telephone number, workplace, job title and signature.</p> <p>In connection with claims and complaints about Dragsbæk's products, information about your experience related to the complaint may also be processed.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> • Directly from you • The company you work for or have a relation to; Dragsbæk's customer, supplier or business partner. • Group entities 	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> • Article 6.1.c (necessary to comply with our legal obligations, including the Danish Bookkeeping Act in connection to issuing invoices). • Article 6.1.f (necessary for the pursuit of Dragsbæk's legitimate interest in business operations, including purchases, pro- 	<p>We share your personal data with:</p> <ul style="list-style-type: none"> • Business partners, including IT suppliers and support, with whom We work to assist our business • Group entities 	<p>We will retain your personal data for up to five years as from the end of the year in which the last purchase or delivery was made, or as from the end of the relationship/collaboration with Dragsbæk's customer, supplier or business partner.</p> <p>However, we may retain the personal data for an extended period if deemed necessary in a specific case, e.g. for establishing legal claims.</p>
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<p>into contracts, providing services, product development, quality assurance of our production, products and food safety, handling of payments, and general communication.</p>			<p>duction, sale and distribution of goods, auditing and quality assurance of our products, as well as ongoing communications in this respect).</p>		
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WHEN YOU VISIT US, COLLECT GOODS OR DELIVER GOODS TO DRAGSBÆK'S FACTORIES, OFFICES AND BUILDINGS

<p><u>Video surveillance and access control:</u></p> <p>If you visit Dragsbæk's buildings or offices, we may use your personal information to issue an access card to be used within our premises.</p> <p>For security and crime prevention purposes, there may also be video surveillance in Dragsbæk's factories, buildings or offices.</p> <p><u>Guest registration in production:</u></p> <p>We may also process your personal data when you visit our production unit. In this connection, you will be asked to fill in a form where you provide certain information that we need for reasons of food safety, our food certifications, and in the event that we should be inspected by the food authorities.</p>	<p><u>Ordinary personal data:</u></p> <p>When you access Dragsbæk's premises, Dragsbæk may process information about your behaviour and movement around our premises - e.g. in the form of video surveillance recordings and logging registrations of your use of the access card to enter our premises.</p> <p>For the purpose of documentary proof of our compliance with food safety standards, we also process information about your name and position as well as your latest travel activities</p> <p><u>Sensitive personal data:</u></p> <p>For food safety reasons, health data for the purpose of registration of guests in the production unit.</p> <p><u>Information about criminal offences:</u></p> <p>We process information about criminal offences committed by you in a location where our</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> • Directly from you, including from your movements within Dragsbæk's premises. 	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> • Article 6.1.c (necessary to comply with Dragsbæk's legal obligation to secure food safety). • Article 6.1.f (necessary for the pursuit of Dragsbæk's legitimate interest in access control, crime prevention and prosecution. Furthermore, Dragsbæk has a legitimate interest in securing food safety and observing the requirements of various food certifications). • Article 9(2)(f) (necessary for the establishment, exercise and defence of legal claims). • Section 8 (3) of the Danish Data Protection Act (Dragsbæk has a legitimate interest in crime prevention and prosecution for property damage). 	<p>We share your personal data with:</p> <ul style="list-style-type: none"> • Business partners, including IT suppliers and support, with whom we work to assist our business • Your employer in the event that you - in your capacity as carrier - run into or otherwise damage Dragsbæk's property. • Group entities • Public authorities, including the Police • BRC (British Retail Consortium) if they act as supervisor of our factories, including the control of guest lists being filled in. 	<p>Video recordings from the video surveillance as well as logs from the access control are deleted after no later than after 30 days - unless the recordings are required for a longer period for the purpose of a specific case, such as a criminal case or a claim for damages.</p> <p>Personal data provided by you in connection with visits to our production unit will be erased within two years.</p>
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	video surveillance is filming you.				
WHEN YOU RECEIVE MARKETING COMMUNICATIONS, NEWSLETTERS AND PRESS RELEASES FROM DRAGSBÆK AND PARTICIPATE IN DRAGSBÆK'S COMPETITIONS OR MARKETING ACTIVITIES					
<p><u>Marketing communications, newsletters, press releases, and competitions:</u></p> <p>Your personal data are used for marketing-related purposes, including:</p> <p><u>to</u> target our communication with you based on your areas of interest and focus;</p> <p><u>to</u> hold competitions and similar marketing activities;</p> <p><u>to</u> send you relevant marketing information in the form of, amongst others, newsletters about our assortment, competitions, recipes, application proposals, news, etc. as well as</p> <p><u>to</u> send you press releases if you have subscribed to Dragsbæk's press list to receive press releases.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, private address, telephone number, email address, IP-address, the time you signed up for the newsletter, your areas of interest, as well as any information you may choose to submit to us in connection with a competition or other marketing activities.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> • Directly from you 	<p>We process your personal data as described on the following legal basis:</p> <ul style="list-style-type: none"> • Article 6.1.f (necessary for the pursuit of our legitimate interest in marketing activities, forwarding press releases, holding competitions, as well as the operation and development of our business). 	<p>We share your personal data with:</p> <ul style="list-style-type: none"> • Business partners, including IT suppliers and support, with whom We work to assist our business • Group entities • Social media 	<p>Marketing material and information collected in connection with marketing activities are usually retained for up to two years for documentary purposes. If we give out prizes in connection with a competition, we may, however, store any accounting records for a period of five years.</p> <p>Information in relation to marketing and press releases is kept for as long as we are legally allowed to send newsletters and press releases to you. If you also are a customer, the information may be stored for as long as you are an active customer and for one year thereafter. An active customer is a customer with whom we have been in contact within the last two years in other contexts than sending out marketing communications. Therefore, such personal data are deleted within three years following the last contact.</p> <p>Information may be retained for a longer period if there are special reasons for doing so, including the need to establish, defend, or exercise a legal claim.</p>

3. AUTOMATED DECISION-MAKING

No automated individual decision-making will be made pursuant to Article 22 of the GDPR.

4. TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

Your personal data may be transferred to countries outside the EU/EEA when we use Microsoft services, as Microsoft uses sub-processors in such countries.

In some cases, the country has been deemed by the Commission of the European Union to have an adequate level of protection of personal data, and if not, we will ensure that there are appropriate safeguards for the transfer through the use of "Model Contracts for the Transfer of Personal Data to Third Countries", as published by the Commission of the European Union, or any other contractual agreement or certification approved by the competent authorities. You may obtain a copy of the contract/agreement by contacting us at gdpr@dragsbaek.dk.

5. MANDATORY INFORMATION

We only collect the information needed for the described purposes. If you do not provide the information, there is a risk that we will not be able to provide services to you, maintain cooperation with you and/or the company in which you are employed, or fulfil Dragsbæk's obligations.

6. YOUR RIGHTS

You have the following rights:

- You have the right to request access to, rectification or erasure of your personal data.
- You also have the right to have the processing of your personal data restricted.
- If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent and exercise your rights as set forth below.
- You have the right to receive personal information, provided by yourself, in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

Furthermore, you have the right to object to Dragsbæk's processing of your personal data as follows:

- **If our processing of your personal data is based on Article 6(1)(e) (public interest or exercise of public authority) or Article 6(1)(f) (balance of interests), see above regarding legal bases, you have the right at any time to object to the processing of your personal data, on grounds relating to your particular situation.**
- **Also, you have an unconditional right to object to our processing of your personal data when your personal data are processed for direct marketing purposes.**

You can exercise your rights by contacting us at gdpr@dragsbaek.dk.

There may be conditions or limitations to these rights. It is therefore not certain that you have the right of e.g. data portability in a specific case - this depends on the specific circumstances of the processing activities.

Last updated: 17.06.2020