



# RPC Superfos Privacy Policy

Effective: May 25, 2018

As a Data Controller RPC Superfos is committed to protecting the privacy and security of your personal information.

This Privacy Policy describes how we (RPC Superfos as a company) act as a Data Controller to collect, use and manage information from persons external to RPC Superfos, like personal representatives of customers, suppliers, other business partners, job applicants and visitors. The policy also describes how we manage your statutory rights to personal information and how to approach RPC Superfos on matters relating to privacy.

When referring to 'RPC Superfos' or 'we', we mean the business entity that acts as the controller or processor of your information. The data controller is RPC Superfos a/s with home address in Denmark or in some cases the RPC Superfos companies in the countries where they operate.

All personal data is collected and processed in accordance with Danish and EU data protection laws.

## How to contact us

Please feel free to contact us if you have any questions about this Privacy Policy or if you are seeking to exercise any of your statutory rights.

Email: [privacy@rpc-superfos.com](mailto:privacy@rpc-superfos.com)

Phone: +45 5911 1110

Danish Head Office: RPC Superfos a/s, Spotorno Allé 8, 2630 Taastrup, Denmark

## Who does this Privacy Policy apply to?

This Privacy Policy applies to the following groups:

- Individuals who represent our current and past customers, suppliers, consultants and other business partners.
- Individuals who represent prospective business partners. This might be targets of marketing campaigns, attendants of exhibitions, recipients of our regular newsletter and other marketing activities.
- Job applicants who respond to job openings or send unsolicited job applications to us.
- Visitors to our production facilities.

## Why we use your data

If you are a customer, supplier or other business partner we collect, hold, use and process your personal data to be able to perform business with you and your company. As a normal and lawful activity, we need to keep and use personal contact information for individual contact persons.



If you are a prospective business partner we collect, hold, use and process your personal data to be able to communicate with you about business matters. For example, if you are a prospective customer we need to communicate with you about our products and services.

If you are a job applicant and you have provided us with job application information, we collect, hold, use and process your personal data as part of the recruitment process to be able to assess your personal and professional qualifications. If you are hired at RPC Superfos, we will keep the job application information and it will form part of your employment history. If you are not hired, we will delete all your information in a secure way after a defined period of time which will be site specific.

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

We will only process your personal data where we have a legitimate basis to do so. The legitimate basis will depend on the reasons why we have collected it and how we need to hold, use and process your personal data.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimize over time the personal data that we use, and if we can anonymize your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

## **Types of data we collect**

For **Business Partners** and prospective business partners we as a maximum collect the following personal information:

- Name
- Company name and company postal address
- Job title and department
- E-mail address
- Phone numbers, direct and mobile
- The type of industry you work in (food, building materials etc.)

We will not require more personal information than this.

If you want to receive our e-mail newsletter or other marketing material via e-mail, we collect the following personal information:

- Name
- Company name
- Title
- E-mail address
- Your preferred language

For **Job Applicants** we might collect a wide range of information including but not limited to the following depending on the type of job. This information might also be collected and processed by a recruitment agency. We may use other sources of information, including social media, when assessing your application.



- Personal contact details such as name, title, private address, private telephone number, and personal email address
- Date of birth
- Gender
- Marital status
- Social Security Number or National Insurance number
- Recruitment information (right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).

Depending on the job opening the following sensitive personal information might be collected:

- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences

For **Visitors** to our production facilities we will collect:

- Name
- Company
- Host
- Arrival and departure times
- A limited set of health information (if you will be visiting the production halls or warehouse)

As a visitor to one of our sites you will most likely be video-taped by the local video surveillance system (CCTV system). Please familiarize yourself with the local CCTV Policy on site.

## **Data you provide to us by your own action**

If you by your own action provide us with additional personal information (like a personal photo sent in an e-mail) we will not use or process this information, but we will also not take special steps to remove it.

RPC Superfos has a social media presence on Facebook, Twitter, LinkedIn and YouTube. Personal information that you share with us on these platforms we will treat according to the code of conduct for the platforms. We will not save your personal information to our own or other systems. We will not manage the content on the platforms (e.g. delete your information after some time). This is the responsibility of the platform owner (the Data Controller for the platform).

## **Security of your personal data**

We are committed to protecting the privacy and security of your personal information.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.



We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Danish and EU law.

We have put in place procedures to deal with any suspected data security breach and will inform any applicable regulator of a suspected breach where we are legally required to do so.

Job Applicants for obvious reasons provide highly confidential and sensitive personal information. This information can only be accessed by the HR function and the persons directly involved in the recruitment process. The HR functions keeps the data in a highly secure manner and protects the data from being lost, used or accessed in an unauthorized way, altered or disclosed.

Your personal data that we hold is mostly located in Denmark and in our offices in Europe. A limited set of personal data is located in third-party cloud services located in Europe.

## Data processing partners

We may provide your personal information to a subsidiary of RPC Superfos, any affiliated companies or other trusted businesses or persons, acting under a confidentiality agreement, for processing personal information on behalf of RPC Superfos. These parties are required to process such information based on our instructions and in accordance with this Privacy Policy. They do not have any independent right to share this information.

We may transfer your personal data if RPC Superfos is acquired by or merged with another company. We will provide notice before this occurs and will post a new Privacy Policy if necessary.

## Your rights over the personal data we hold

Under certain circumstances you have rights to control the personal data we hold about you. We have listed the most relevant rights below.

- Request **information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- Request **access** to your personal information (commonly known as a "Data Subject Access Request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request **correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request **erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

There are more rights, but some are not relevant for the personal data held by RPC Superfos. You can see the complete list of rights in the [General Data Protection Regulation, chapter 3](#).

If you want to exercise any of these rights, then please send an e-mail to [privacy@rpc-superfos.com](mailto:privacy@rpc-superfos.com) stating your name, the right or rights you want to exercise and the reason or reasons for this. We will then return to you with further information.



With regard to access requests, we will provide the information to you within one month of the request. In the event of information not being available within this time period, we will contact you and provide an explanation as to why there is a delay.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **Your right to object**

You have the right to opt out of our newsletter or other direct marketing at any point, and we will deal with your request right away. You can unsubscribe from our emails automatically by clicking the unsubscribe link in the newsletter or direct marketing email.

## **Data Protection Authority**

You have the right to raise a concern or lodge a complaint with a supervisory authority (national regulator).

## **Use of cookies**

We use cookies and other third-party tracking technologies in our websites that help us collect information about our customers' and users' preferences. You can choose to permit or restrict the use of these technologies through your personal browser settings. Our cookies do not contain any personally identifying information.

If you do not wish to receive cookies, you may choose not to accept cookies and to erase cookies that are stored on your hard drive. As a user, you should be aware that the websites will not necessarily work 100% properly if the cookies are deleted or you block cookies.

## **Changes to this Privacy Policy**

We review our data protection and privacy procedures and policy regularly and post any changes to our Privacy Policy on this page.