

## **Potential, current and previous customers of YX Smøreolie A/S**

As a data controller company, we are strongly focused on data protection. We protect the personal data that we handle, and ensure that we comply with applicable data protection legislation.

We give persons whose data we process (the “data subjects”) information about our data processing and their rights as data subjects.

In this privacy policy we describe how we process our customers’ data.

## **Who we are and how you can contact us**

### **Data controller company**

### **YX Smøreolie A/S Buddingevej 195, DK-2860 Søborg CVR no.: 32068057**

YX Smøreolie A/S delivers (sells) lubricating oil and related products to commercial customers and only registers the personal data of the employees of our commercial customers. We only register the information necessary to operate our business and give our customers the best service.

If you have questions about our processing of your data, you are always welcome to contact us by email at: sales@yxlube.dk or telephone at: +45 70 11 56 78.

## **Our processing of personal data**

### **Categories of personal data**

The data concerning you that we process may include:

The following types of data are collected and saved for administrative, service-related and/or legal purposes:

- Personal data such as names and email addresses concerning the company
- Details of traffic patterns and IP addresses
- Account number to use for automatic payment via Leverandørservice (Supplier service)
- Authorisations and certificate of registration in connection with exemptions from taxes
- Data is saved and treated as confidential in accordance with the legislation on the processing and protection of personal data. This is described further under “Disclosure of personal data”.
- Invoice information for use by our carriers

### **Ordinary personal data, including**

- Identification details, including name, address (including delivery addresses), telephone number and email address
- Purchase history
- Payment history and payment details
- Information included in our correspondence with you
- IP addresses
- Signatures on documents such as loan agreements, etc.

### **Updating of address details and subscription for credit information**

- YX Smøreolie A/S is affiliated to Bisnode and Atradius credit insurance and receives daily updates with information from these sources, such as when customers change address and rating.

### **Purpose and legal basis**

We process data for the following purposes:

- Administration of customer relationships, maintenance and cultivation of customer relationships and ongoing commercial interaction
- Marketing to current and potential customers
- Customer satisfaction measurement among existing customers
- Ensuring compliance with applicable legislation

The legal basis for our processing of personal data is:

- On processing personal data in conjunction with fulfilment of your orders and purchases, including delivery, credit extension and payment, the legal basis for our registration of the data is Section 6(1) of the Danish Data Protection Act, cf. Article 6, paragraph 1 (b) of the General Data Protection Regulation, concerning processing that is necessary in order to enter into a contract and for the performance of the contract.
- When we register information that is required in accordance with the Danish Bookkeeping Act, or as an element of the reporting obligation to the tax authorities, the legal basis is Section 6(1) of the Data Protection Act, cf. Article 6, paragraph 1 (c) of the General Data Protection Regulation, concerning the processing that is necessary for compliance with a legal obligation to which the data controller is subject.
- The legal basis for our collection and registration of the other personal data is Section 6(1) of the Data Protection Act, cf. Article 6, paragraph 1 (f) of the General Data Protection Regulation, concerning the processing that is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests of the data subject. The legitimate interest which is the basis for processing is the consideration of promoting YX Smørelie A/S' business and offering customers the best service and good offers.
- Information about you may be disclosed with due observation of the processing rules in data protection legislation and other Danish legislation. In each individual case, we will assess whether the disclosure requires your explicit consent, or whether disclosure can take place on another legal basis.
- Statistics. The legal basis for data processing solely for statistical and scientific purposes is Section 6(1) of the Data Protection Act, cf. Article 6, paragraph 1 (e) of the General Data Protection Regulation, concerning the processing that is necessary for the performance of a task carried out in the public interest. Only information that is necessary for the investigation is used, and the information may not be used for other than solely statistical purposes.

## Categories of recipients

We transfer or disclose personal data to one or several of the following categories of recipients:

- Banks in connection with the administration of payments for benefits and services
- Transport companies for the delivery of orders and follow-up on this
- Attorneys, collection and credit information agencies on the breach of agreements and data retrieval from credit information agencies
- Credit insurance companies for customers
- Betalingservice (Payment service) and Leverandørservice (Supplier service) in conjunction with automatic payments
- Tax authorities and other authorities in conjunction with statutory reports
- Our data processors on the basis of data processing agreements
- The probate court and administrators in connection with legal claims

## Erasure

We erase information about you when it is no longer necessary.

YX Smørelie A/S generally adheres to the retention period under the Bookkeeping Act. To ensure correct handling of recurring customer relationships, potential complaints and guarantee obligations, and in order to fulfil our obligations, we have assessed that it is necessary to retain the information for up to five years, plus the current financial year, from the end of the business relationship.

## Your rights

In accordance with legislation, you have a number of rights with regard to our processing of information concerning you.

You can contact us in order to exercise your personal data rights. You can find our contact details at the start of this policy.

When you have requested access to information concerning you, and to have this information rectified or erased, or if you have exercised your right to object to our data processing, we will investigate whether it is possible to fulfil your request. We respond to your enquiry as quickly as possible and no later than one month after receipt of your enquiry.

## Your rights

### **Right to view information (right of access)**

- You have a right of access to the data we process about you, as well as various additional information.

### **Right to rectification (rectification of data)**

- If you believe that the personal data we process concerning you is inaccurate, you have a right to rectification. You must contact us and inform us of the nature of the inaccuracies, and how they can be rectified. In all cases we must consider whether we deem your request to be justified. When you contact us with a request for rectification or erasure of your personal data, we investigate whether the conditions are fulfilled and, in the affirmative, make the changes or erase the data as quickly as possible.

### **Right to erasure**

- As a general rule, we erase personal data that is no longer necessary. In special cases, you have the right to erasure of specific information about you, before the date of our ordinary general erasure of data. This applies, for example, if you withdraw your consent and we have no other basis for processing the information. If you believe that your data is no longer necessary with regard to the purpose for which the data was obtained, you can request erasure of the data. You can also contact us if you believe that your personal data is being processed in conflict with legislation or other legal obligations.

### **Right to restriction of processing**

- If you contest information that we have registered or otherwise process, you can request us to restrict the processing of the data until we have been able to determine whether the data is correct. You can also request restriction rather than erasure if you believe that our processing of the data is unlawful, or if you believe that we no longer need the data, or if you believe that your legitimate interests take precedence before the legitimate interests of the data controller. If it is upheld that our processing must be restricted, going forward we may only process the data with your consent, or so that legal claims can be determined, invoked or defended, or to protect a person or important interests in society.

### **Right to transmit data (data portability)**

- You have the right to receive personal data that you have made available to use, and the data we have obtained about you from other operators, with your consent. If we process data about you as an element of a contract to which you are a party, your data may also be sent to you. You also have the right to transfer this personal data to another service provider. You can also request us to have the data sent directly from the data controller to another authority or company. If you wish to exercise your right to data portability, you will receive your personal data from us in a normally used and machine-readable format.

### **Right to object**

- You have the right to object to our processing of your data. You can also object to our disclosure of your data for marketing purposes. You can submit an objection using the contact details above. If your objection is justified, we will discontinue the processing of the data.

### **Right to receive information about a new purpose**

- If we wish to use data about you for another purpose than the purposes we have previously disclosed to you, e.g. in this privacy policy, you have the right to information about this, before we further process the data for the other purpose.

### **Right to withdraw your consent**

- If our processing of your data is based on your consent, you may withdraw this consent at any time. If you withdraw your consent, we may in future no longer process the data. Revocation of consent will not affect the legality of the processing that is based on the consent, before any such revocation. If we have another legal basis for processing than consent for a separate purpose – such as the retention of information in order to comply with the bookkeeping regulations – this processing may still take place.

If you are not satisfied with our response, you can make a complaint to the Danish Data Protection Agency. As a general rule, if you are not satisfied with how your personal data has been processed, you can make a complaint to the Data Protection Agency, which will then investigate and take a decision in the matter.

You can find the Data Protection Agency's contact details at [www.datatilsynet.dk](http://www.datatilsynet.dk)

NB! You can write to the Data Protection Agency via Digital Post at [lifeindenmark.dk](mailto:lifeindenmark.dk), where your enquiry is submitted on a confidential basis (encrypted). We recommend that you use Digital Post if your enquiry contains confidential information or sensitive personal data.