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| <p>Praca mandskabsløsninger – Faglærte vikarer til din virksomhed –</p> <p>DATA PROTECTION POLICY FOR</p> <p>Praca</p> | Approved d.07 Christmas 2018 |
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GeneralT

Background

This policy is based on regulation (EU) 2016/679 of the European Parliament and of the Council of 27 april 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such information ("GDPR") and Applicable national legislation and guidelines.

Praca is the data controller and strives to maintain and continue to build a strong privacy and privacy culture in order to protect all the personal data collected and processed in the company.

The processing of personal data is, as a starting point, related to the company's own employees, but also concerns the processing of personal data related to the company's business activities. This policy thus describes the rules and guidelines which the company has determined to be used for the processing of personal data by its own employees and other relevant data subjects.

In order to protect the personal data, the company continuously assesses the level of risk associated with the processing. The company is particularly aware of the risks of discrimination, ID theft, financial loss, reputational loss and data confidentiality.

Purpose

The purpose of this policy is to set and describe the company's rules on the protection of individuals (data subjects) in relation to the processing of personal data in the company.

Responsibility and Application

This policy replaces previous data protection policies and applies to all data subjects in the company, including employees. Policy Be used for processing of personal data carried out wholly or in part by automated processing, and Other non-automatic processing of personal data.

Definitions and explanations

"processing" shall mean any activity or series of activities — with or without the use of automated processing — to which personal data or a collection of personal data is subject, such as the collection, The registration, organisation, systematisation, storage, adaptation or alteration, retrieval, retrieval, use, disclosure by Transmission, dissemination or any other form of transfer, composition or Combination, restriction, erasure or destruction ;

"Biometric data" means personal data which, as a result of specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person,

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enables or confirms the unambiguous identification of For example, the Facial image or fingerprint data

"Personal data breach" shall be construed as a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed ;

"controller" shall mean a natural or legal person, a public authority, an institution or any other body which alone or jointly with others determines the purposes and means of the operations; Processing of personal ^{data}

"Data Processor" shall mean a natural or legal person, public authority, institution or other body which processes personal data on behalf of the Controller ;

"GDPR" shall be understood as ^{regulation} (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such information ;

"Genetic data" shall be understood as personal data relating to the inherited or acquired genetic characteristics of a natural person, providing unambiguous information on the physiology or health of the natural person and In particular, after an analysis of a biological sample from the natural person concerned;

"Health information" means personal data relating to the physical or mental health of a natural person, including the provision of health services, and providing information on his or her health status;

"Personal^{data}" means any information relating to an identified or identifiable natural person (' data subject '); Identifiable natural person means a natural person who can be identified, directly or indirectly, in particular by an identifier such as a A name, an identification number, location data, an online identifier or one or more elements specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person ;

"Consent of the data subject" shall be understood as any voluntary, specific, informed and unambiguous expression of the data subject, whereby the data subject, by declaration or clear confirmation, agrees that Personal data relating to him or her shall be subject to processing by the

"the company" shall be construed as

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Data protection policy

Data protection and Privacy principles

The protection of personal data is of great importance to the company. This applies both to own employees, to customers and suppliers, and to other data subjects where the company processes personal data.

This policy has been adopted to:

- comply with applicable laws and practices;
- Protect the employee's personal data
- Protect the personal data of other registered
- Protect your company's data
- Processing personal data necessary to fulfil the company's obligations as a controller;
- Minimise the use of consent to only those situations where there is no other legal method/basis for processing personal data;

Data protection is the responsibility of all employees. It is very easy to inadvertently disclose information about a colleague to a customer or a friend or about a customer to a spouse or relative. To avoid this, all employees should avoid discussing matters that could potentially lead to non-compliance with this policy.

The company basically wants to protect the privacy and confidentiality of natural persons. The company acknowledges that not only its own employees, but also customers, suppliers and other data subjects with whom the company comes into contact during a working day, are entitled to know that their respective personal data will not be used for Purpose other than the original one.

In order to comply with applicable laws and practices, personal data will be collected and processed according to the purpose, as well as stored securely and not disclosed to other persons/third parties without the consent of the data subject.

Principles for the processing of personal data

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Personal Data in the company shall:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject (' legality, fairness and transparency ');
- Collected for specified, explicit and legitimate purposes and shall not be further processed in a manner that is incompatible with those purposes (' purpose limitation ');
- Be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (' Data minimisation ');
- Be accurate and, if necessary, updated; Every reasonable step must be taken to ensure that personal data which are inaccurate in relation to the purposes for which they are processed are immediately erased or rectified (' accuracy ');
- Be stored in such a way that it is not possible to identify the data subjects for a longer period than is necessary for the purposes for which the personal data are processed (' storage limitation ');
- Processed in a manner that ensures adequate security of the personal data concerned, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical Organisational measures (' integrity and confidentiality ');

Processing of sensitive personal data

The GDPR defines an exhaustive list of sensitive personal data that the company does not process, unless there is a clear legal basis, a labour law obligation or unambiguous consent:

- Racial or ethnic origin
- Political, religious or philosophical beliefs
- Trade union membership
- Genetic data, biometric data
- Health information
- Sexual relations or sexual orientation

If the company processes one or more sensitive personal data, this information will be erased after use/at the end of 5 years from the date of termination of contract;

Sensitive personal data will not be transferred to countries outside the EU/EEA area unless there is a clear legal basis and an adequate level of protection of the data subject's sensitive personal data in the country concerned.

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Treatment ActiviteR

The company processes personal data about its employees, especially in relation to the employment relationship, but also about the company's suppliers, partners and other third parties (other data subjects).

The processing of personal data in the company is as a starting point (i) necessary under contract, where the data subject is party, (ii) necessary to comply with a legal obligation, or (iii) based on a written consent of the The data subject, who consents to the establishment, for example, of the Processing personal data before, during and after the employment relationship.

Purpose of processing personal data

The company collects, processes and stores the personal data of data subjects in relation to certain lawful, including business, purposes. This happens, for example, when the company needs to:

Use Employee information:

- Name
- Contact details, including residential address
- CPR No.
- Images
- Employment
- Pay
- Training conditions
- Experience
- Bank & Pension Information
- Sick leave
- Personality test, IQ test, business test
- Relatives data
- ETC.

It may be necessary for the company to process the following sensitive personal data both during employment and at the termination of employment:

- Information on criminal offences
- Major social problems
- Health information
- Information about the reason for dismissal or dismissing
- Etc.

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Use Customer information:

- To provide customers with the services they have requested
- For billing and accounting purposes
- To enable the company to respond to customer inquiries
- For verification of customer identity (security purposes)
- To promote the services and products of the company to its customers;
- Etc.

Use business-related information:

- To maintain company accounts and business documents
- To enable the company to respond to inquiries
- To verify Identities
- Etc.

Use domain names and email addresses:

- In such a way that cannot be referred to a particular individual. This is done with a view
On quality control and improvement of the company's website
- To send news about the services that site visitors have enrolled
- To inform customers about other company services
- Etc.

Use financial information including credit card information:

This information is used for the purpose of getting payment for Var's and services. The Company does not store this information, Lthan is necessary to carry out a treatment.

If the company wishes to use the personal data of data subjects for a purpose other than the original, the data subject shall be informed of the new purpose and shall request the consent of the data subject before commencing the processing. If there is another lawful basis for the new processing, it shall inform the data subject.

We would like to ensure that only personal data which are necessary for the specific purposes are processed. The Company's IT Systems is therefore, designed so as to collect only the the required amount of data and retention of the personal data happens not yet longer than necessary.

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Controlmeasures

We continuously check and update the personal data collected so as to ensure that the personal data processed by them are not inaccurate or misleading.

Since the company's administration relies on the employee's personal data to be accurate and up-to-date, the company requests the employees to disclose relevant changes to the personal data. In doing so, the employee must apply to the full Highlands

Rights of the data subject

The entity shall, as the controller, take appropriate measures to provide any information on processing to the data subject in a concise, transparent, intelligible and easily accessible form and in clear and plain language. The information is provided upon request of the data subject in an writing or electronic form.

If personal data relating to a data subject are **collected from the** person concerned, the entity shall, as the controller at the time of collection of the personal data, provide it with all of the following information:

- The identity and contact details of the controller and its representative, if any;
- The purposes of the processing for which the personal data are to be used and the legal basis for the processing;
- The legitimate interests pursued by the controller or a third party;
- Any recipients or categories of recipients of the personal data;
- Where applicable, that the Controller intends to transfer personal data to a third country;

In addition to the above information, the entity, as the controller at the time of collection of the personal data, shall provide the data subject with the following additional information that is necessary to ensure a fair and transparent Treatment:

- The period during which the personal data will be stored or, if that is not possible, the criteria used to determine that period;
- The right to request from the controller access to and rectification or erasure of personal data or restriction of processing relating to the data subject or to object to processing and the right to data portability;
- The right to withdraw consent at any time, without prejudice to the lawfulness of processing based on consent prior to its withdrawal;
- The right to lodge a complaint with the Data Inspectorate

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- Whether the provision of personal data is a statutory or a requirement under a contract or a requirement that must be fulfilled in order to conclude a contract, and whether the data subject is obliged to disclose the personal data and the possible consequences of not providing Such information
- The existence of automated decisions, including profiling, and at least meaningful information about the logic thereof, as well as the significance and expected consequences of such processing for the data subject.

If the personal data have **not been collected from the data subject**, the entity shall, as the controller, provide the following information:

- The identity and contact details of the controller and its representative, if any;
- The purposes of the processing for which the personal data are to be used and the legal basis for the processing;
- The categories of personal data concerned;
- Any recipients or categories of recipients of the personal data;
- Where applicable, that the Controller intends to transfer personal data to a recipient in a third country;

In addition to the above information, the entity shall, as the controller, provide the data subject with the following information necessary to ensure fair and transparent processing in respect of the data subject :

- The period during which the personal data will be stored or, if that is not possible, the criteria used to determine that period;
- The legitimate interests pursued by the controller or a third party ;
- The right to request from the controller access to and rectification or erasure of personal data or restriction of processing relating to the data subject and to object to processing and the right to data portability;
- The right to withdraw consent at any time, without prejudice to the lawfulness of processing based on consent prior to its withdrawal;
- The right to lodge a complaint with the Data Inspectorate
- The source of the personal data and, where applicable, whether they originate from publicly available sources;
- The existence of automated decisions, including profiling, and at least meaningful information about the logic thereof, as well as the significance and expected consequences of such processing for the data subject.

The company shall provide the information listed in the list of:

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- Within a reasonable period after the collection of the personal data, **but at the latest within one month**, taking into account the specific reasons for which the personal data have been processed;

The data subject's right of objection

The data subject shall have the right to have the company's confirmation of whether personal data relating to the person concerned are processed and, where appropriate, access to the personal data and the following information:

- purposes of the processing
- The categories of personal data concerned;
- The recipients or categories of recipients to whom the personal data are subject will be disclosed, if possible, the envisaged period of time during which the personal data will be stored;
- The right to request from the controller rectification or erasure of personal data or restriction of the processing of personal data relating to the data subject or to object to such processing;
- The right to lodge a complaint with a supervisory authority;
- Any available information on where the personal data originate, if not collected from the data subject;
- The existence of automated decisions, including profiling, and at least meaningful information on the logic thereof, as well as the significance and expected consequences of such processing for the data subject;

Right to Rectification

The data subject has the right to have inaccurate personal data relating to him or her rectified without undue delay. The data subject shall, taking into account the purposes of the processing, have the right to complete incomplete personal data, in particular: by providing a supplementary statement.

Right to Erasure ('right to be forgotten')

The data subject has the right to have personal data about himself erased by the company without undue delay and the entity is obliged to erase personal data without undue delay if any of the following conditions are true:

- The personal data are no longer necessary to fulfil the purposes for which they were collected or otherwise processed;
- The data subject withdraws his or her consent and there is no legal basis for the processing of
- The registered objection to the processing and there are no legitimate grounds for the processing which go to the opposition;
- The personal data have been unlawfully processed;

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- The personal data must be erased in order to comply with a legal obligation under UNION or Member State law to which the undertaking is subject.

Right to restriction of processing

The data subject has the right to obtain restriction of processing from the undertaking if one of the following conditions is true:

- The correctness of the personal data is disputed by the data subject during the period until the company has had the opportunity to determine whether the personal data are correct
- The processing is unlawful and the data subject opposes the deletion of the personal data and instead requests that its use be restricted;
- The data controller no longer needs the personal data for the processing, but it is necessary for the establishment, use or defence of legal claims;
- The data subject has objected to the processing during the period while verifying whether the legitimate interests of the undertaking are prior to the legitimate interests of the entity concerned;

Obligation to provide information in relation to rectification or erasure of personal data or Restriction of processing

The entity informs each recipient to whom the personal data have been disclosed of any rectification or erasure of the personal data or restriction of processing ; Unless this proves impossible or is disproportionately difficult. The Company inform the data subject of those recipients if so requested by the data subject.

Right to data portability

The data subject has the right to receive, in a structured, commonly used and machine-readable format, personal data relating to himself, which he has provided to a controller, and has the right to transmit that information to another controller without Obstacle from the controller to whom the personal data have been provided when processing is based on consent or on a contract and the processing is carried out automatically.

Right to object and revocation of consent

The data subject may at any time object to the undertaking the processing of the personal data of the data subject, thereby withdrawing a prior consent to the processing.

However, the data subject must be aware that any recall may be contrary to the essential interests of the undertaking and, in that case, the revocation may have consequences , for example. for an employee's employment relationships. In addition, there will be certain personal data which we will be able to process without the consent of the data subject if we have a legitimate interest in and that the interests of the data subject do not exceed that interest.

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Automated individual decisions, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects him or her.

Data **processors**

in the course of the company's processing of personal data, the company is required to transfer personal data to third parties from time-to-day.

Transfer to third parties includes, but is not limited to:

- Injuries
- Tax
- Pension & Insurance Providers
- Public authorities to which the company is required by law to disclose personal information about its employees.

The company has entered into data processing agreements with all its data processors and has these agreements registered in its systems.

Data **security** **The**

company has decided **not** to employ an internal or use an external Data protection Officer (DPO) as defined in the GDPR.

Instead, the company's board of directors decided and approved to set up a ' Data protection network ', at least consisting of 1 representative from the management Owner of the full Highlands and 1 employee representative. The ' Data Protection network ' is responsible for the daily handling of the company's data protection, including the implementation and securing of appropriate GDPR compliance within the company.

The company ensures that personal data are always kept safe from unauthorized or unlawful loss or disclosure. In addition, the company has a backup procedure for all of its personal data. The responsible employee of the company's IT infrastructure, on behalf of the company, is responsible for specific and detailed IT security policies that govern the security features of the GDPR.

Infringements and penalties

Any violation of this policy must be reported to the company's owner in its capacity as Chairman of the company's ' Data Protection network '

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If an employee unauthorized extradite the company's personal data to a third party, such action may have employment law implications for that employee.

Approval – Amendments and additions

This policy is approved by the Owner of the full Highlands of the company.

Changes to or additions to this policy must be made by the Chairperson of the company's ' Data Protection network ' and finally approved by the Owner of the full Highlands of the company.