

Privacy Policy

Danske Rederier
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1. Introduction

- 1.1 This privacy policy (hereinafter referred to as "**the Policy**") describes how Danske Rederier (hereinafter referred to as "**us**," "**we**," or "**our**") processes personal information.
- 1.2 The Policy is formulated and made available to comply with applicable rules on disclosure obligations.

2. Types of Processed Personal Information

- 2.1 Danske Rederier collects personal information solely for specific, relevant, and legitimate purposes. The type of personal information we process depends on the relevant and specific purpose. In general, we process personal information within the following categories:

Membership administration and provision of services to our members, including in connection with events and meetings, as well as advocacy on business policy matters and issues related to employment and labor relations. Danske Rederier processes personal information about employees who are employed by our members or partners. This information typically includes names, addresses, phone numbers, emails, positions, and more. When carrying out positions of trust for Danske Rederier, the processing of personal information additionally includes CPR numbers and identification. In the context of business policy advocacy, the processing of personal information also extends to elected politicians and their political affiliations. In cases related to employment and labor relations, the processing of personal information additionally includes information about members' employees, sick leave, employment-related sanctions (including warnings and terminations), and other relevant information necessary for case handling.

Services, including the administration of education, holiday pay, competence funds, maternity leave compensation, leasing of premises, and other fund and office administration. When Danske Rederier provides services to members and clients, we process personal information about employees and partners of our members and clients. This occurs, for example, in the execution of education and courses under Danish Shipping Education, handling of holiday pay for shipping companies and sailors, processing of submissions and applications to competence funds, reporting and requests for maternity leave refunds from the shipping industry's maternity leave compensation scheme, leasing of premises for business purposes, fund administration, and other office administration as per the agreement.

In this context, we process information such as names, addresses, phone numbers, emails, positions, CPR numbers, employment conditions (including personal information related to personnel and salary administration), education and course preferences, due dates for childbirth, payment information, income and financial information, collective agreement details, and other information necessary for Danske Rederier to deliver the agreed-upon service.

Newsletters and other informational communications. In order to send newsletters and other informational communications to members of Danske Rederier and other individuals who wish to receive newsletters, we process personal information such as names, email addresses, and other relevant information for accurate delivery. We only send emails when we have obtained consent for this purpose.

- 2.2 If we need to collect and process additional personal information beyond what is stated above, we will inform you during the collection process. Such information may also be provided through updates to this Policy.

3. **Purposes of Processing Personal Information**

- 3.1 We only process your personal information for legitimate purposes in accordance with GDPR rules. The processing of personal information may include:
 - a) Membership administration and provision of services to our members. This includes business policy advocacy, where Danske Rederier's work involves representing the interests of the shipping industry, highlighting the industry's specific challenges, and influencing regulations and political priorities for the benefit of our members. Additionally, Danske Rederier represents our member shipping companies in matters related to employment and labor relations. This may include ongoing advice, legal and civil cases, as well as collective bargaining negotiations.
 - b) Provision of services, including education and training, administration of holiday pay, administration of competence fund contributions, administration of maternity leave compensation funds, leasing of commercial premises, fund administration, and other office administration as per the agreement.
 - c) Sending newsletters via email.
- ### 4. Legal Basis for Processing Personal Information

4. **Legal basis for the processing of personal information**

4.1 We only process your personal information when we have a legal basis for processing in accordance with GDPR rules. The processing of personal information occurs based on the specific circumstances, relying on the following legal grounds:

- a) Processing is necessary for the performance of a contract with the registered legal entity.
- b) Processing is necessary for the implementation of measures taken at the request of the data subject prior to entering into a contract.
- c) If we have requested your consent for the processing of specific personal information, the legal basis for processing such specific personal information is your consent. You can always withdraw your consent by contacting us, as outlined in section 9 for contact. If you withdraw your consent, the personal information processed based on the consent will be deleted, unless it can or must be processed, for example, to comply with a legal obligation.
- d) Processing is necessary for the pursuit of a legitimate interest, where the interests or fundamental rights and freedoms of the data subject, requiring protection of personal information, do not override such legitimate interests.

5. **Disclosure and Transfer of Personal Information**

5.1 We only disclose personal information to others when the law permits or requires it, including when it is relevant and upon your and/or the data controller's specific request.

5.2 We disclose personal information to the following recipients from the EU/EEA:

- a) Data processors
- b) Suppliers
- c) Collaborators

5.3 We generally use various external and professional companies as suppliers and collaborators to deliver or assist us in delivering our services. Suppliers and collaborators will not receive or process personal information unless the law permits the transfer and processing thereof. If the suppliers or collaborators act as data processors for us, their processing of personal information always complies with a data processing agreement that meets legal requirements. If suppliers or collaborators are independent data controllers, their processing of personal information follows their own privacy, data protection, or personal data policy, as communicated by suppliers and collaborators, unless the law prescribes otherwise.

- 5.4 We transfer personal information to countries or international organizations outside the EU/EEA.
- 5.5 We can be contacted for more information, including inquiries about our use of data processors, collaboration with other data controllers, including subsidiaries, or the disclosure of personal information to third countries. Additionally, you can contact us to receive a copy of the documentation for the transfer basis, as outlined in section 9.

6. Deletion and Storage of Personal Information

- 6.1 We ensure that personal information is deleted when it is no longer relevant for our processing purposes, as described above. We always retain personal information for the period required by applicable laws, including for compliance documentation, such as the Bookkeeping Act. If you have questions regarding the storage and processing of personal information, you are welcome to contact us, as outlined in section 9.

7. Rights of Data Subjects

- 7.1 Registered individuals have a range of rights that we can assist with. If someone, as a registered individual, wishes to exercise their rights, they should contact us. The rights include the following:
 - 7.1.1 Right to access information (right to insight): Registered individuals have the right to access the information processed about them.
 - 7.1.2 Right to correction (rectification): Registered individuals have the right to have incorrect information about themselves corrected.
 - 7.1.3 Right to erasure: In special cases, registered individuals have the right to have information about themselves deleted before the time of our regular general deletion occurs.
 - 7.1.4 Right to restriction of processing: In certain cases, registered individuals have the right to have the processing of their personal information restricted. If a registered person has the right to restrict processing, we may only process the information - except for storage - with consent, or for the purpose of establishing, enforcing, or defending legal claims, or to protect a person or important societal interests.
 - 7.1.5 Right to object: In certain cases, registered individuals have the right to object to our otherwise lawful processing of their personal information.
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- 7.1.6 Right to data portability (dataportability): In certain cases, registered individuals have the right to receive their personal information in a structured, commonly used, and machine-readable format, as well as to have this personal information transferred from one data controller to another without hindrance.
- 7.2 You can learn more about your rights in the Danish Data Protection Agency's guidance on the rights of data subjects, which you can find at www.datatilsynet.dk.

If you wish to exercise your rights as described above, you can contact us, see section 9 for contact information.

We strive to do everything possible to accommodate your wishes regarding our processing of personal information and your rights as a data subject. If, despite our efforts, you wish to file a complaint, you can do so by contacting the Danish Data Protection Agency at www.datatilsynet.dk.

8. Changes to this Policy

- 8.1 We reserve the right to update and change this Policy. In case of significant changes, we will provide notice through visible communication channels.

9. Contact

- 9.1 For questions, inquiries, or to exercise your rights, contact us at GDPR@danishshipping.dk.
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