

DATA PROCESSING POLICY

Collection and storage of personal data

Fondsmæglerselskabet Maj Invest A/S, Maj Invest Equity A/S and Maj Invest Holding A/S (hereinafter referred to as “the Maj group”) will not collect personally identifiable information without confirmation/consent to store and process these data. Personally identifiable information is information that relates to an identifiable natural person an individual. The Maj group’s registration of personally identifiable information is typically limited to personal identification number (CPR no.), name, address, phone number and email address. Telephone conversations are recorded to serve as documentation for advisory services and order execution.

The Maj group collects personal data for the purpose of legitimate interest when a natural person or legal person (i) becomes a client or is considering to become a client of the Maj group, (ii) has given consent to the Maj group using the personal data for a specific purpose, e.g. registration for newsletters or events or (iii) when required by law.

When the Maj group, as data controller, uses third party suppliers (data processors) of systems and software, the Maj group will ensure through data processing agreements, monitoring, reporting and follow-up that personal data is processed in accordance with applicable law. In the implementation and maintenance of organisational and technical provisions, an appropriate security level is maintained in terms of collecting, processing and storing personal data. Access to personal data is restricted and monitored, cf. our IT security policy.

The Maj group will store personal data for as long as it is relevant and in accordance with applicable law, including the EU’s General Data Protection Regulation (GDPR).

All personally identifiable information is processed confidentially. The Maj group will not sell or disclose personal data to others without consent or legitimate reason.

In connection with client handling and reporting, it-hosting and support, accounting and corporate activities and AML/KYC requirements, personal data will be transferred to third countries outside of the EU/EEA including Canada, USA, Australia, Peru, Vietnam, Singapore and Indonesia. The Maj group secures an appropriate level of protection and provides necessary guaranties and agreements in order for the level of protection to follow the personal data. To the extent that personal data is transferred to a data processor, the Maj group will as far as possible refer to applicable European Commission international data transfers using model contracts.

Rights of the data subject

All data subjects may request for insight into what data the Maj group is processing about them. Such request for insight must be addressed within four weeks from the date of receipt. If this deadline, due to technical or other reasons, cannot be met, a written notice of the delay must be sent to the data subject requesting insight. Access to insight may be restricted by law, consideration for the protection of other people's privacy, business secret and internal assessments and material that may be exempted from the right to gain insight.

Correction or deletion of data

If the Maj group is informed of any incorrect or irrelevant registration of personal data, the Maj group will ensure immediate correction or deletion in consideration of the legislative restrictions.

Complaints against the Maj group's processing of personal data

If you wish to complain about our processing of your personal data, you can contact: Datatilsynet, Borgergade 28, 5., DK-1300 Copenhagen K, email dt@datatilsynet.dk.

Changes to the policy

Changes to the policy will be published on the respective companies' websites.

CONTACT THE MAJ GROUP'S DATA PROTECTION ADVISOR

Email: dpo@majinvest.com

Gammeltorv 18

DK-1457 Copenhagen K

CVR numbers: 28295499 (Fondsmæglerselskabet Maj Invest A/S), 28716648 (Maj Invest Equity A/S), 28295480 (Maj Invest Holding A/S)