

## Privacy notice for www.bruunhjeje.dk and CRM

Version: January 2024

This privacy policy explains how Bruun & Hjeje Advokatpartnerselskab (“Bruun & Hjeje”) processes personal data

- on our website
- of course participants
- of meeting participants
- of data subjects in our CRM system
- of participants in events such as networking events
- in connection with TV surveillance
- of contacts with Bruun & Hjeje’s suppliers and business partners (secondary persons)
- of persons mentioned in articles, judgments, business registers and other public registers etc.
- of our employees’ next of kin
- of beneficial owners, members of management (both the executive board and the board of directors) and other contacts in businesses about who we collect data pursuant to the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism (Money Laundering Act)

### 1. Categories of personal data and purpose

We collect and process the following personal data:

Categories of data subjects	Categories of personal data	Purpose of processing	Legal basis for processing
Visitors to the website	Session cookies <ul style="list-style-type: none"> <li>• IP address, operating system, language setting, browser type, equipment type, MAC number (depending on equipment), etc.</li> </ul>	<ul style="list-style-type: none"> <li>• To download the website from the server and optimise the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Bruun &amp; Hjeje’s legitimate interests in delivering the website, cf. article 6(1)(f) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act.</li> </ul>
Course participants	<ul style="list-style-type: none"> <li>• Course registrations, cancellations, course certificates, e-mail address, employer</li> <li>• Any information about self-payment and invoicing</li> <li>• Evaluation of course etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Registrations etc. for courses and issuance of course certificates</li> </ul>	<ul style="list-style-type: none"> <li>• Bruun &amp; Hjeje’s legitimate interests in offering, carrying out and evaluating courses, cf. Article 6(1)(f) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act.</li> </ul>

			The legitimate interests of the registered in participating in the course and receiving a course certificate
Meeting participants	Recordings of meeting participants at <ul style="list-style-type: none"> <li>Physical meetings</li> <li>Virtual meetings</li> <li>Telephonic meetings</li> </ul>	<ul style="list-style-type: none"> <li>Recordings of meetings and/or conversations in relation to case work, such as drafting referrals etc.</li> </ul>	<ul style="list-style-type: none"> <li>Bruun &amp; Hjejle's processing of recordings of meetings and/or conversations is based on consent, cf. article 6(1)(a) of the General Data Protection Regulation, cf. section 6(1) of the Danish Protection Act.</li> </ul>
CRM data subjects and event participants e.g., participants in networking event	<ul style="list-style-type: none"> <li>Name, employer, title, address, phone numbers, e-mail address, whether client or not</li> <li>Sign-ups for invitations, professional interest areas, personal interest areas to be used for invitations</li> <li>Previous participation in events</li> <li>Where applicable, information about passport copies, civil registration numbers, hunting licences and gun licences</li> <li>Where applicable, information on self-payment and billing</li> <li>Evaluation of events</li> <li>Documentation of consent</li> <li>Mood pictures taken at events</li> </ul>	<ul style="list-style-type: none"> <li>Marketing purposes, including invitations to events, seminars and courses, which are as tailored as possible.</li> <li>Bookings for travel and accommodation in connection with events etc.</li> <li>Marketing of Bruun &amp; Hjejle using mood pictures will take place on the specified platforms to which the privacy policy for the events refers to, primarily LinkedIn. It will always be possible for participants to refrain participation in the pictures by staying in the picture free zones or in other ways, e.g., by using a sticker, indicating pictures may not be taken of the person in question.</li> </ul>	<ul style="list-style-type: none"> <li>Bruun &amp; Hjejle's legitimate interests in marketing itself and the legitimate interests in offering, carrying out and evaluating events, etc., cf. article 6(1)(f) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act</li> <li>Passports copies, civil registration numbers, hunting licences and gun licences; consent to collection and disclosure, cf. article 6(1)(a) of the General Data Protection Regulation, cf. section 6 of the Danish Data Protection Act</li> <li>Disclosure of ordinary personal data for the use of bookings is Bruun &amp; Hjejle's legitimate interests in arranging events/network meetings, cf. article 6(1)(f) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act</li> </ul>
Persons recorded via TV-surveillance (in connection with doorbell activation)	<ul style="list-style-type: none"> <li>Recordings of persons using our doorbell</li> </ul>	<ul style="list-style-type: none"> <li>Identification of visitors</li> <li>Prevention and detection of crime</li> </ul>	<ul style="list-style-type: none"> <li>Contrary to section 1 of the Danish TV Surveillance Act (not publicly accessible area), article 6(1)(f) and article 10 of the General Data Protection Regulation and sections 6 and 8 of the Danish Data Protection Act. Bruun &amp; Hjejle has legitimate interests in monitoring who activates the doorbell as part of the implementation of security measures and for identification.</li> </ul>
Contacts with suppliers and business partners	<ul style="list-style-type: none"> <li>Name, employer, title, address, phone numbers, e-mail address</li> </ul>	<ul style="list-style-type: none"> <li>Contact to suppliers or business partners</li> </ul>	<ul style="list-style-type: none"> <li>Bruun &amp; Hjejle's legitimate interests in communicating with the supplier or business partner, respectively, cf. article 6(1)(f) of the General Data</li> </ul>

			Protection Regulation, cf. section 6(1) of the Danish Data Protection Act.
Persons mentioned in various articles, judgments, CVR registers and other public registers etc.	<ul style="list-style-type: none"> <li>Name, employer, title, address, phone numbers, subject of the matter e.g. article or judgment</li> </ul>	<ul style="list-style-type: none"> <li>Used for provision of legal advice and background-knowledge for case-handling</li> </ul>	<ul style="list-style-type: none"> <li>Bruun &amp; Hjejle's legitimate interests in providing legal advice and gaining background knowledge, cf. article 6(1)(f) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act.</li> </ul>
Our employees' next of kin	<ul style="list-style-type: none"> <li>Name, phone number, relation to employee</li> </ul>	<ul style="list-style-type: none"> <li>Contact to next of kin in case contact is necessary</li> </ul>	<ul style="list-style-type: none"> <li>Bruun &amp; Hjejle's legitimate interests in communicating with an employee's next of kin, cf. article 6(1)(f) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act.</li> </ul>
Beneficial owners, members of management and other contacts in businesses about which we process data under the Money Laundering Act	<ul style="list-style-type: none"> <li>Name, residential address, e-mail address, phone number, copy of passport or similar identification documents</li> <li>Civil registration number</li> <li>Status as a politically exposed person (also for connected persons)</li> <li>Communication with the business about which data are processed under the Money Laundering Act</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with the Money Laundering Act, including in connection with customer identification and the obligation of investigation, recording, notification and storing</li> <li>The data which we process under the Money Laundering Act are not processed for other purposes</li> </ul>	<ul style="list-style-type: none"> <li>Bruun &amp; Hjejle's compliance with a legal obligation in Part 3 and 5 of the Money Laundering Act, cf. article 6(1)(c) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act.</li> </ul>
All of the above	All of the above	<ul style="list-style-type: none"> <li>Compliance with applicable legislation (e.g. the EU General Data Protection Regulation, e-privacy rules) and other legitimate purposes, including compliance with basic principles of the processing of personal data and the legal basis for the processing and documentation, implementation and maintenance of technical and organisational security measures, investigation of suspicions or knowledge of</li> </ul>	<ul style="list-style-type: none"> <li>Legal requirements</li> <li>Bruun &amp; Hjejle's legitimate interests, which are stated in the column to the left, cf. article 6(1)(f) of the General Data Protection Regulation, cf. section 6(1) of the Danish Data Protection Act.</li> </ul>

		<p>security breaches and reporting to individuals and authorities, handling of enquiries and complaints from data subjects and others, handling of inspections and enquiries from supervisory authorities, handling of disputes with data subjects and third parties, and when processing is necessary for the establishment, exercise or defence of legal claims.</p>	
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You have the right to withdraw your consent. However, if you withdraw your consent, the withdrawal will not affect processing and disclosure preceding the withdrawal of your consent.

**2. Sources**

The personal data are being collected from you, from your device and from our surveillance cameras.

As regards data of beneficial owners, members of management and contacts in the businesses about which we process data in connection with the Money Laundering Act, these data come from the data subjects or the businesses about which we collect data to live up to our obligations under the Money Laundering Act.

**3. Voluntariness**

When we collect personal data directly from you, you give us your personal data voluntarily. The consequence if you do not give us the above personal data is that we cannot make the website available, analyse the use of invitations or make bookings for you (only for data subjects in the CRM system).

As regards data collected under the Money Laundering Act, it is compulsory to give these data in order for Bruun & Hjejle to meet its obligations under the Money Laundering Act.

#### 4. Data processors

We use data processors to host personal data and to provide support, security etc. for the use of the systems. Some of our suppliers are domiciled in USA, why personal data may be transferred to USA. In such cases, we ensure a valid transfer basis for instance in the form of the European Commission's standard contractual clauses etc. for data transfers to third countries whose security level is not deemed adequate by the European Commission. Transfer may in other circumstances be necessary in order to establish, exercise or defend legal claims.

#### 5. Only for data subjects in CRM who are signed up to receive invitations

We transfer the personal data to our data processors, who are currently web-hosting providers and email delivery providers.

#### 6. Disclosure (in connection with participation in events)

In connection with booking of accommodation and travel, it may be necessary to disclose personal data to travel agencies, hotels, agents assisting with visa applications, embassies, event organizers, other participants in the event, course etc. The transfers are based on article 49 (1)(b)(c) and (e) in the General Data Protection Regulation.

#### 7. Storage periods

- **Visitors to the website:** We do not store personal data about you, as we only use session cookies.
- **CRM data subjects and event participants:** We store personal data until 1) you request that the data is deleted, or 2) until you have not been registered for three years with any interest areas in order to receive relevant communication from us.
- **Contacts:** We store the data as long as they are relevant for the relationship with the supplier or business partners and for the establishment, exercise or defence of legal claims.
- **Course participants:** Registrations and course certificates are deleted after three years.
- **Recordings of meeting participants:** We store recordings until the purpose of the recording is no longer present.
- **Persons mentioned in articles/judgments etc.:** Stored without time limit in order to fulfil the purpose of knowledge.
- **Next of kin:** We delete personal data when an employee leaves the company.
- **Beneficial owners, members of management and contacts in businesses about which we process data under the Money Laundering Act:** We delete personal data 5 years after the termination of the business relationship or the completion of the individual transaction, cf. section 30 of the Money Laundering Act.

#### 8. Your rights

Data subjects have the following rights (on the terms and subject to the exceptions provided by law):

- The right of access to personal data
- The right to rectify incorrect and misleading personal data
- The right to be forgotten
- The right to restrict the processing of personal data
- The right to data portability (where the processing is based on consent or contract)

You also have the right to file a complaint with the Danish Data Protection Agency – see [www.datatilsynet.dk](http://www.datatilsynet.dk) (in Danish only).

#### **The right to object**

##### **Legitimate interests**

You have the right - for reasons relating to your particular situation - to object to the processing of personal data where the legal basis is legitimate interests, as stated above. Hereafter, Bruun & Hjejle may no longer process the personal data unless Bruun & Hjejle demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

##### **Direct marketing**

###### Only CRM data subjects that have signed up for event invitations

If personal data are processed for the purpose of direct marketing, you have the right at any time to object to the processing of your personal data for such marketing, including to object to profiling in so far as it relates to direct marketing. If you object to processing for the purpose of direct marketing, the personal data may no longer be processed for this purpose.

## **9. Contact**

If you have any questions about the processing of your personal data or how you may exercise your rights, you are welcome to contact us at

Bruun & Hjejle Advokatpartnerselskab, Nørregade 21, DK-1165 Copenhagen K, Telephone: 33 34 50 00 - E-mail: [gdpr@bruunhjejle.dk](mailto:gdpr@bruunhjejle.dk), CVR No.: 37975192.

We update this privacy policy on an ongoing basis and publish the version applicable at any time on [www.bruunhjejle.dk](http://www.bruunhjejle.dk).