



Declaration on the protection of personal data under the Personal Data Regulation (GDPR)

HCS A/S Transport & Spedition (HCS) gives high priority to the protection of personal data. Therefore, in our activities, we follow the applicable legal rules for the protection of personal data and data security.

Declaration on the protection of personal data applies to HCS A/S Transport & Spedition within the EU / EEA. The requirements apply in addition to the general privacy policy that apply globally, and prevail in case of a conflict with this declaration.

1 Responsibility

Information on HCS in relation to GDPR and additional information about the competent supervisory authority can be found on our website.

You can contact the company's Internal Data Protection Officers - per letter or possibly email at the email address; personale@hcs.dk. Remember to write attention to "The Internal Data Protection Officer".

2 Purpose of processing, legal basis

HCS processes personal data in accordance with the provisions of the EU Personal Data Regulation (GDPR) and national data protection legislation:

To fulfill contractual obligations (Article 6, (1) (b) in (GDPR));

- Especially in connection with customer orders, suppliers, service partners and employees

In order to safeguard legitimate interests in the balance of interests (Article 6 (1) (f) (GDPR));

If necessary, HCS processes all personal data in addition to the actual performance of the contract in order to safeguard the legitimate interests of our own or third parties, particularly:

- Transfer of personal data within the HCS
- Control and optimization of processes for requirements analysis and direct customer contact; including customer segmentation and contractual likelihood calculation
- Presentation of legal claims and defense in litigation
- Guarantee of IT security
- Video surveillance for the protection of property rights and protection of buildings and property against vandalism and theft
- Measures for building and civil engineering (eg access control)
- Measures to safeguard property rights
- Measures for business management and further development of services and products
- Risk management at Group level





a. On the basis of consent (Article 6, (1) (a) i (GDPR))

If HCS has received consent for the processing of personal data for specific purposes (eg film and photo recordings, newsletters), the processing is legal as a result of the consent. A consent can be revoked at any time. This also applies to revocation of consent declarations made against HCS prior to the GDPR's effective date, ie. May 25, 2018. Please note that the revocation only applies to future treatment. The processing of personal data that occurred before the revocation is not affected.

b. Due to legal obligations (Article 6, (1) (c) i (GDPR)) or for reasons of public interest (Article 6, (1) (e) i (GDPR))

Furthermore, HCS is subject to various legal obligations, ie. legal requirements (eg contributing to counter-terrorism, money laundering legislation). The purpose of processing includes, among other identity verification, compliance monitoring and reporting obligations in relation to tax and social security, prevention of fraud and money laundering and the assessment and management of risks in the HCS.

3 Who gets access to the personal information?

Within HCS, people get access to personal data in order to fulfill HCS' contractual and statutory obligations or to be able to perform legitimate interests.

Furthermore, companies that are company law affiliated to HCS A/S Transport & Spedition, as well as our subcontractors and assistants, as well as authorities or third parties, can receive personal data for these purposes.

In particular, the following recipients and recipients offering the following activities and services may receive data in this regard:

- Companies that are company-law affiliated to HCS A/S Transport & Spedition
- HCS' IT department as central data center
- Third-party service providers
- Public bodies to fulfill statutory reporting obligations, eg tax authorities, social security institutions, the criminal justice system
- Managing bank details
- Support / maintenance of IT / IT applications
- Filing
- Document handling
- Data screening in connection with the prevention of money laundering
- Data destruction
- Auditing
- Leasing companies
- Credit companies
- Debt collection companies
- Payment card payments (debit card / credit card) and payment transactions
- Reporting
- Telephony
- Web site management
- Insurances



4 Is personal data passed on to third countries or to an international organization?

Data transfers to countries outside the EU or EEA (so-called third countries) only take place if this is necessary to execute customer orders (eg transport, production, logistics), this is prescribed by law (eg tax reporting obligation) that has given us consent thereto or in connection with a contractual processing of personal data. Furthermore, data exchange also takes place with affiliated companies in HCS in third countries.

If subcontractors are used in third countries, they are required by written instructions as well as by EU standard contract clauses to comply with the EU level of personal data protection. Appropriate corresponding contractual agreements have been entered into with affiliated companies in HCS.

5 How long will personal data be stored?

HCS processes and stores personal data as long as it is necessary to fulfill our contractual and statutory duties. We will delete personal information as soon as they are no longer required for the above purposes. It may happen that personal data are stored as long as claims can be made against our companies (statutory limitation period of three or up to thirty years). We also store personal information if we are legally obliged to do so. Corresponding obligations result from corporate and tax legislation as regards documentation and storage.

6 What rights do you have in relation to the protection of personal information?

Any registrant has the right to access under the GDPR Article 15. Under certain conditions, any registered right of rectification under the GDPR has Article 16, the right to limitation of treatment under the GDPR Article 18 and the right to deletion under Article 17 of the GDPR Furthermore, any registered right to obtain personal data on itself in a structured, commonly used and machine-readable format (data portability) under the GDPR Article 20, if the processing is automatic and based on consent.

In relation to the right of access and the right to deletion, the restrictions under sections 34 and 35 of the German Personal Data Protection Act (BDSG) apply to responsible companies in HCS based in Germany.

Any data subject has the right to file a complaint with a supervisory authority, in particular in the Member State where he or she has his habitual residence or place of work or where the alleged infringement has occurred (Article 77 of the GDPR). Further information about the competent supervisory authority can be found on our website.

You may at any time revoke a consent given to the processing of personal data. This also applies to the revocation of consent declarations submitted to us prior to the time of the GDPR, ie. May 25, 2018. Please note that the revocation only applies to future treatment. The processing of personal data that occurred before the revocation is not affected.



7 Right to object

In addition to the above rights, you also have the right to object as follows;

- Information on the right to object under GDPR Article 21
- Right to object in relation to a specific treatment

One has the right to object to the processing of personal data at any time for reasons relating to a particular situation based on GDPR Article 6 (1) (e) (data processing in the public interest) and Article 6 (1) (f) (data processing in order to pursue a legitimate interest); This also applies to profiling as defined by GDPR Article 4 (4). If objections are made, we will no longer process the personal data unless we can substantiate significant reasons for the processing to be protected and which exceed the interests, rights and freedoms of persons, or document that the processing is necessary to make, exercise or defend legal claims.

Right to object to the processing of personal data for marketing purposes. In some cases, we treat your personal data for direct marketing purposes. You have the right at all times to object to the processing of personal data for such marketing; This also applies to profiling if it is in connection with such direct marketing. If we object to treatment for direct marketing, we will no longer process the personal data for this purpose.

The opposition may be submitted without any formal requirements to the contact person listed under section 1.

8 Right to appeal

You have the right to appeal to the contact person listed in section 1 or to a supervisory authority in the Member State where you live, work or where the alleged infringement has occurred (GDPR Article 77).

9 To what extent is performed automated decisions?

In establishing and maintaining business relationships, we generally do not apply decisions based solely on automatic processing of personal data under the GDPR Article 22. If we use such methods in a few cases, we will disclose this if we are committed for this.

10 Is "profiling" taking place?

We treat personal data partially automated for the purpose of assessing certain personal aspects (profiling). For example, we use profiling in the following cases:

- Legal requirements stipulate that we must contribute to the fight against terrorism.
- In order to be able to inform and advise purposefully on products, we use analytical instruments. These enable a demand-oriented communication and marketing.

25 February 2019

Mads Frederiksen, CEO