

**AkademikerPension**

Akademikernes  
Pensionskasse  
Smakkedalen 8  
DK-2820 Gentofte

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akademikerpension.d  
k  
CVR nr. 20766816

## Personal data policy

At AkademikerPension we take your privacy and the due process of law seriously. In this Personal data Policy you can read about how we process your personal data. According to the General Data Protection Regulation (GDPR) and the Danish Data Protection Act we are obliged to inform you about our use of your personal data. In this policy, you may read how we collect, process, use, disclose and protect your personal data.

This policy addresses our members, visitors, proxy holders, decisionmakers in companies we collaborate with, applicants for open positions, sole proprietorships, and individuals.

Relevant parts of this policy apply to AkademikerPension subsidiaries, including MP Investment Management A/S.

Last updated December 2023

### **Data controller**

AkademikerPension  
Smakkedalen 8  
2820 Gentofte

VAT/CVR.no.: 20766816

Tel.: +45 3915 0102

Contact information of our DPO (Data Protection Officer):

[dpo@akademikerpension.dk](mailto:dpo@akademikerpension.dk)

## MEMBERS

### The purpose of processing your personal data:

Processing is necessary for the purpose of administration of your pension scheme, including: admission to AkademikerPension, advice or changes regarding your pension scheme, claims handling in connection with disability or death, payments to or from AkademikerPension, communication with you as a member, holding a General Assembly, membership meetings or board elections, tests in connection with development of our member system, compliance with legal obligations, money laundering procedures in accordance with legislation, development and administration of our products and services, in addition to marketing purposes and for statistical use.

### What data is collected:

#### **General personal data:**

- Contact information
- Information for the purpose of identification, incl. national identification number or passport etc.
- Financial and accounting information
- Information about your insurance- or pension choices and options
- Information about social conditions (ex. whether you, your spouse, partner, or member of your household receives any income-related benefits).

In addition, we also process:

- Current and historical data about your pension scheme with us and contact information about your possible spouse and/or children.
- Copies of death or marriage certificates in case of payment to relatives in the event of death.
- Data, you submit to us for use to generate an investment-profile
- Data related to your behavior when you have logged in to your own profile at AkademikerPension.dk and on our social media.
- System-generated data on whether you have opened information sent to you in e-Boks.
- In connection with member meetings and the General Assembly we process visual material and sound in which you can appear.
- Cookies when you visit AkademikerPension.dk to improve the quality of our website, please see our cookie policy here: <https://akademikerpension.dk/arkiv/cookies/>

#### **Sensitive personal data:**

Health data and the name of your spouse/registered partner may be processed in specific situations.

### The legal basis for processing your personal data

**We process your personal data on the basis of the General data protection regulation:**

- Article 6, 1. B: The processing is necessary to be able to fulfil the pension agreement with you as a member (contractual obligation)
- Article 6, 1. C: The processing is necessary to comply with a legal obligation
- Article 6, 1. F: The processing is necessary for us or a third party to pursue a legitimate interest, e.g., analyses or system development.

**We process your sensitive personal information on the basis of the General data protection regulation:**

- Article 6, 1, a and Article 9, 2, F - The processing is necessary for the establishment, exercise, or defense of legal claims

- Article 6, 1. A and Article 9, 2. A - The processing is based on your explicit consent
- Social security number (CPR) is processed based on the Danish Data Protection Act, section 11, and FIL §43b to ensure proper identification and verification of your identity and the information you furnish to us

#### Who do we share your personal data with

We only share your personal data with others if we are obliged to, entitled to or have your consent to do so. We share your personal data with your employer, Pensionsinfo, public institutions and public registers, the CPR-register, Udbetaling Danmark, the Danish Tax Agency, Insurance & Pension (the EDI system for transfer of pension schemes), The National Patient Register in connection with critical illness coverage, our business partners in connection with holding General Assembly, board meetings and board elections or sending out newsletters and general information,. We share your personal data with banks, suppliers we work with, Health & Pension, other pension companies and data processors.

In addition, we share your health data with a specialist, doctor or hospital based solely on your explicit consent in specific situations. The legal basis for the health care professional to exchange the health information is in Sundhedslovens §43, stk. 1 regarding consent for the exchange of information to private companies. AkademikerPension is also a member of HEFO (Videncenter for Helbred og Forsikring), an independent association which advises insurance companies and pension companies with the sole purpose that most people will be eligible for insurance. This exchange will also require your explicit consent.

#### **Specific for the prevention of money laundering:**

AkademikerPension is obliged to comply with the statutory rules laid-down to minimize the risk of money laundering and terrorist funding.

Therefore, we are required to obtain certain information about our members and investment clients, including information about identity and about whether the member or client and his/her next of kin or associated persons are politically exposed persons. We are obliged to examine the background and purpose for all complex and unusual transactions and activities as well as document the result of these investigations. Therefore, AkademikerPension has, among other things, special focus on and increased safeguards concerning:

- Members who make large and extraordinary deposits.
- Members who repurchase their pension schemes.
- Members who make deposits into a §53 scheme.
- Recipients of pension who are residing abroad, Greenland or the Faroe Islands.
- Members and the next of kin and associated persons who are categorized as politically exposed persons.
- Members who do not have a social security number (CPR).
- Investment clients.

We store personal data collected in accordance with the Danish Anti-Money Laundering Act for 5 years after you are no longer a member of AkademikerPension or the collaboration has ended.

If money laundering or terrorist funding is suspected, we are obliged to notify SØIK (the State Prosecutor for Serious Economic and International Crime) and inform of the background for the notification. We are also obliged to hand over information collected in accordance with the Danish Anti-Money Laundering Act to the Danish Financial Supervisory Authority if they inquire.

As a general rule you have the right to gain access to the personal data we process about you, but this right of access does not include the information we have documented in connection with the money laundering investigations we are obliged to carry out. Furthermore, you cannot be informed whether we notify SØIK, or what information we disclose to SØIK, in case of suspicion of money laundering or terrorist funding.

## **JOB APPLICANTS**

### The purpose of processing your personal data:

We need your personal data to evaluate your suitability as a candidate and to assess your qualifications for the position in question.

### What data is collected:

#### **General personal data**

We only collect the data you submit with your application. We ask that you do not send us documents that contain your social security number (CPR). We also ask you never to enclose information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or genetic data, biometric data, data concerning health or data concerning your sex life or sexual orientation.

The information we process is usually:

- Contact information
- information about your former employers and areas of responsibility,
- information about education and personal qualifications,
- personality profile, information from references you have provided us with.

If you are offered employment and it is relevant for your position, you will be asked to present a criminal record. This criminal record is not saved by AkademikerPension, but it is documented that it has been presented.

We only process the information you include in your application and resume, and we request that you not include any sensitive information incl. your national identification number.

### The legal basis for processing your personal data

**We process your personal data on the basis of the General data protection regulation:**

- Article 6, 1. F: The processing is necessary for us or a third party to pursue a legitimate interest, e.g., assess your qualifications as a potential new employee.

### Who do we share your personal data with:

We do not share your personal data with others

## **FORMER EMPLOYEES**

### The purpose of processing your personal data:

The purpose of processing your personal data after resignation is that we have an administrative need to be able to document your employment period, the settled salary, the tasks of your position, and history of any personnel matter. In addition, there are tax law provisions that we as an employer must comply with in relation to report information to SKAT. Limitation periods can also have an effect on the storage of your information after termination of employment.

### What data is collected:

We collect the data you submitted with your application, and we collect the data we have received in connection with your recruitment process and the information added to your personnel file during your employment.

Information that will be common in your personnel file is:

- Contact information
- National identification number
- Financial information such as including salary and bank information
- Information on sick leave (not health data), vacation, marital status, work tasks, tax information, photo, contact information for family members, in addition to transcripts from employee interviews during your employment.

The legal basis for processing your personal data

**We process your personal data on the basis of the General data protection regulation:**

- Article 6, 1. C : The processing is necessary to comply with at legal obligation
- Social security number (CPR) is processed based on the Danish Data Protection Act, section 11, and FIL §43b to ensure proper identification and verification of your identity and the information you furnish to us

Who do we share your personal data with:

We do not share your personal data with others

## **PARTNERS, SUPPLIERS AND VISITORS**

The purpose of processing your personal data:

The purpose of processing your personal data is to ensure a good cooperation, comply with legislation, contractual obligations, e.g. knowledge sharing, procurement of products and services and payment of services.

What data is collected:

We collect bank and account information, addresses, VAT number, etc. from your company. In addition, we collect name, email address, telephone number for you as a contact person in the company, and in certain situations also passport copy and CV information of you as a contact person, based on a specific assessment and need for identification.

The legal basis for processing your personal data

**We process your personal data on the basis of the General data protection regulation:**

- Article 6, 1. B: The processing is necessary to be able to fulfil the agreement between out two companies
- Article 6, 1. C : The processing is necessary to comply with at legal obligation (ie. for identification purposes)
- Article 6, 1. F: The processing is necessary for us or a third party to pursue a legitimate interest, (ie. to be able to better communicate with you as a representative of your company).

Who do we share your personal data with:

We do not share your personal data with others

## **INFORMATION FOR ALL**

What data is collected

In the above-mentioned situations, we process your personal data in the form of image material, sound and video-sequences, and in Teams recordings this will also

include your name and contact information if it appears when you log into the meeting via your digital connection.

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#### Where do we collect personal data:

We collect the personal data you submit to us, and retrieve information from the following depending on our relationship with you (please refer to the above situations)

#### How long is the personal data stored for

We keep your personal data as long as we have a legal obligation or legal basis for storing them. Some of our deletion deadlines are mentioned here:

- Membership data – 10 år after you have left AkademikerPension as a member. We follow the principles in the Statute of limitation
- Data supplied from you and given in regard to an offer for membership pension, which you did not accept – 3 months after the offer has expired
- Payment information – current year plus 5 years in accordance with the Bookkeeping Act
- Personal data collected as a part of our obligations in accordance with the Money Laundering Act (KYC) are kept for 5 years after you have left AkademikerPension as a member
- Image – and videomaterials from CCTV on the premises of Smakkedalen 8, 2820 Gentofte are kept for 14 days past the recording date
- Personal data on previous employees are deleted on set intervals – and at the latest 5 years after employment has ceased
- Personal data on applicants for open positions are deleted at the latest 3 months after the position has been filled by another applicant

#### Personal data – processing outside the EU/EEA

Your personal data is as a rule only processed within the EU/EEA, and we do not transfer personal data to countries outside the EU/EEA. Likewise, we do not allow our partners (data processors) to transfer personal data outside the EU/EEA. However, there may be individual data processors or sub-data processors that are located outside the EU/EEA. In such case they will be located in safe third countries, which means they will have the same level of protection as within the EU. If a transfer of personal data occurs to a third country, the EU has not deemed as having adequate protection equivalent to that in the EU, it will occur on the basis of the Standard Contractual Clauses made by the EU-Commission. This is the case with data processors, whose owners are in the US. Since we do use Microsoft, Adobe and other US-suppliers of IT-solutions, such a transfer can occur.

The US is not deemed a safe third country, and we must advise you of the fact, that American companies such as these may be forced to deliver your personal data to the US-authorities in connection with their investigations of crime or terrorism. We are not able to stop this from occurring but have made every effort to ensure the highest protection of your data in addition to establishing a "customer lock-box" when possible. You may see the lists of Microsofts or Adobes sub-processors on their websites. You are also free to request a copy of the Standard Contractual Clauses by contacting us at e-mail: [dpo@akademikerpension.dk](mailto:dpo@akademikerpension.dk)

#### **CCTV and TEAMS**

If you have participated in a meeting at our business address Smakkedalen 8, 2830 Gentofte, you have been filmed by our CCTV at one of our entrances.

Regarding CCTV at entrance areas: the purpose is to secure our employees and entries to our facilities against theft and unauthorized access.

In connection with member meetings or our General Assembly, we will be processing image material, video sequences and recording sound, in which you may appear. The purpose for processing the recordings, is to document what is being said and what occurs during the meeting, in addition to prepare accurate report. You will always be notified of whether the meeting will be recorded before it occurs.

Digital meetings, such as Teams-meetings, may also be recorded. Whether a Teams-meeting is recorded, will be evaluated on the background of the specific circumstances at the meeting, including participants and their individual relations in addition to the purpose for recording. A Teams-meeting will be recorded, if it is necessary to document the purpose of the meeting, agreements made, or information given at the meeting. You will always be informed before recording is effectuated. If it is not necessary to record the meeting for documentation purposes, you will be asked for your consent to record. However, it may in the specific situation be evaluated that the participants in the meeting have such a professional or social relation to each other, that it will be permissible to inform all participants, that the meeting will be recorded and asked to opt-out instead of asking you for your consent.

In connection with visits on our website: [akademikerpension.dk](http://akademikerpension.dk), your personal data will be processed in the form of cookies. The purpose for this is to improve the quality of our service on the website. For more information, please read the cookie-policy here: [www.akademikerpension.dk/arkiv/cookies](http://www.akademikerpension.dk/arkiv/cookies)

### Your rights

The General Data Protection Regulation contain rules that provide you with a number of rights toward those who process data related to you.

The rules are intended to strengthen your legal position by creating transparency about the processing of data and greater awareness regarding your rights in relation to the processing of your personal data.

We have procedures and guidelines to ensure your rights in connection with our processing of your personal data. However, there may be conditions or restrictions in connection with the use of your rights. Therefore, there is no guarantee that you have the right to have your data deleted in the specific matter. It will depend on the circumstances of the specific situation.

Initially, AkademikerPension can inform that we do not use automated decisions.

#### You have the right of access

You have the right to access the personal data we process about you.

By writing us, you can request access to the personal data we have about you.

You can ease our turnaround time by specifying if you wish access to specific data or time periods.

#### You the right to have your personal data rectified

If there have been changes to your data, you can always contact us to have it corrected.

#### You have the right to have your personal data deleted

In certain situations, you have the right to have your personal data deleted before the time of our general deletion occurs. We have deletion procedures for all personal data, but if you wish to have your data deleted before, please contact us. We may not be able to comply with your request, but in that case, it will be because we have a legal obligation to store the data for a longer period.

#### You have the right to have our processing of your personal data restricted

In certain situations, you have the right to demand that we suspend our processing of your personal data. This applies, for examples, if you believe that the information we have about you is incorrect or if you have objected to the processing. Please contact us if you wish to have our processing of your personal data suspended.

You have the right to object to our processing of your personal data

You have the right to object to our processing of your personal data in 2 cases: If the processing is based on "legitimate interest" and special circumstances apply to you.

If your personal data is processed for the purpose of direct marketing. Please contact us if you wish to exercise your right to object.

You have the right to have your personal data transmitted (data portability)

In certain situations, you have the right to receive the personal data you have provided to us, in a structured and commonly used, machine-readable format and to have it transferred from one data controller to another.

You have the right not to be subject to automated decisions, including profiling.

AkademikerPension does not use automated decisions.

You can always withdraw a consent.

If you are asked to provide your consent, it will be voluntary for you to do so, and you can always withdraw it by contacting us. Please use the contact information in this personal data policy

Your withdrawal of a consent will not affect the processing carried out before you withdrew your consent, but only going forward.

Please contact us if you wish to withdraw your consent.

## Complaints

If you are dissatisfied with our processing of your personal data, you have the right to file a complaint to:

The Danish Data Protection Agency (Datatilsynet)  
Carl Jacobsens Vej 35  
2500 Valby  
Denmark

At [www.datatilsynet.dk](http://www.datatilsynet.dk) you can read more about how to complain and the terms that apply to your complaint.

Before you file a complaint with the Danish Data Protection Agency, we encourage you to contact our Data Protection Officer to clarify any questions.

**Contact information for DPO (Data Protection Officer):**

[dpo@akademikerpension.dk](mailto:dpo@akademikerpension.dk)

If you have filed a complaint to the Danish Data Protection Agency, they will keep you informed of the progress of the case and the result of the complaint.

## "SOCIAL MEDIA"

AkademikerPension uses sociale media to market the AkademikerPension brand and products, and in order to be able to communicate with you on those platforms. All communication will occur on the terms and conditions, the social platform makes available and in accordance with our implemented guidelines.



AkademikerPension and the social media in question are joint controllers in processing your personal data. This means that you must be aware that the social media platform processes your personal data on its own accord. The processing agreement with the various media, you may find here:

Meta: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)

LinkedIn: <https://legal.linkedin.com/pages-joint-controller-addendum>

X: [Privacy \(twitter.com\)](https://twitter.com/Privacy)

The purpose of our processing of personal data is to make AkademikerPension visible as a workplace and to market the company to potential and existing members and partners.

The purpose of processing your personal data on those platforms is to brand AkademikerPension as a workplace, and market the company to potential and existing members of the pension scheme and collaborative partners.

#### What data is collected:

AkademikerPension processes the information about you which you submit to us in connection with a comment or direct message from you to us via META, X, LinkedIn or Instagram. It will usually just be your name, possibly your photo, and your question or comment to us. A direct message will be handled in accordance with our regular query guidelines.

For more information, please see the social media privacy policies:

Meta: <https://www.facebook.com/policy.php>

LinkedIn's privatlivspolitik: <https://www.linkedin.com/legal/privacy-policy?>

X: <https://twitter.com/en/privacy>

Vimeo: <https://vimeo.com/privacy>

YouTube: <https://policies.google.com/privacy?hl=en-US>

#### Where do we collect personal data:

We only collect the information submitted to you as a part of your inquiry, "like" or comment. In addition, we receive anonymous statistical information about the users of our social media page.

#### Who do we share personal data with:

We do not share your personal data in connection with your visit to our social media pages.

#### The legal basis for processing of personal data:

The majority of the collected information is processed by the social media platform to target content to you. This information is not at our disposal to and cannot be accessed by AkademikerPension.

The information available to AkademikerPension is not personally identifiable but contains an overview of visitor statistics that can be used to improve our use of AkademikerPension's page and target sponsored content by knowing the users' interest, demographics and geography.

In addition, the information you submit to us via your comment, direct message or "likes" is processed. The processing of this information based on: Article 6, 1. F: The processing is necessary for us or a third party to pursue a legitimate interest

#### How long is the personal data stored for:

Information supplied by you in your communication with us will be continuously deleted, and has a final deletion deadline of 2 years. The social media platform will

however still have control of the personal data, even after it has been deleted by AkademikerPension.

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#### Personal data outside the EU

Please note, that most social media are American companies, for which reason the information the social media platform has about you as a starting point may be located outside the EU/EEA. In this case, we refer to their Data Policy. Links are above.