

# PRIVACY POLICY

---

## All4Labels Denmark SB A/S

CVR no. 21855197

### **1 WHO ARE WE?**

All4Labels Denmark SB A/S (hereinafter "we" or "us") is the data controller for the processing of your personal data as further described in this privacy policy.

If you have any questions about this policy or our processing of your personal data, you are always welcome to contact us:

All4Labels Denmark SB A/S

Engvej 13

Stevnstrup

8870 Langå, Denmark

[dklan-gdpr@all4labels.com](mailto:dklan-gdpr@all4labels.com)

### **2 WE PROCESS YOUR PERSONAL DATA**

We process personal data for various purposes, which you can read more about below.

We only retain/disclose personal data for as long as/when necessary to fulfil the purposes for which the personal data was collected or if it is necessary to comply with our legal obligations.

#### **2.1 Contact persons at business partners and corporate customers**

In the context of a business relationship, we process your personal data for contract performance or, to take steps prior to entering a contract with us. The legal basis for this data processing is Art. 6 (1) (b) GDPR.

We may also process your personal data if we are required to do so by law, based on Art. 6 (1) (c) GDPR. This may include, for example, tax laws, anti-money laundering or anti-terrorism laws.

We may also process your personal data based on our legitimate interest such as ensuring IT security, carrying out internal and external investigations/audits, assertion of legal claims or defense in legal disputes (Art. 6 (1) (f) GDPR).

Our employees who process your data have committed themselves to confidentiality and compliance with the relevant legal obligations. Furthermore, they are subject to awareness-raising and trainings in data protection law regularly. If you contact us on behalf of your company or organization, we process your personal data pursuant to Art. 6 (1) (f) GDPR for the purpose of our legitimate interest to communicate and initiating or executing our business relationship. As the contact person, you have the right to object to this processing at any time with effect for the future pursuant to Art. 21 GDPR.

To the extent necessary for the operation of the company, we disclose such personal data to relevant business partners, suppliers, etc. including, for example, software suppliers, freight companies, accountants, and lawyers.

We generally store the above personal data for as long as the customer/supplier relationship exists or until the contact person in question is no longer employed by our supplier, customer, etc.

Personal data registered in connection with sales, delivery, invoicing, etc. is stored for 5 years after the end of the relevant financial year in accordance with our obligations under the Danish Bookkeeping Act.

## 2.2 Users of our website

### 2.2.1 Usage Data

When you visit our website, our web server temporarily evaluates usage data for statistical purposes in order to improve the quality of our website. This data consists of the following data categories:

- the name and address of the requested content,
- the date and time of the query,
- of the transferred data volume,
- the access status (content transferred, content not found),
- the description of the used web browser and operating system,
- the referral link, which indicates from which page you reached ours

The aforementioned log data will be evaluated anonymously.

In addition, we collect the following information about you in order to detect, limit and eliminate attacks against our websites:

- Your IP address, cf. GDPR Art. 6(1)(f).

Your IP address is stored for a period of 30 days, after which it is deleted or anonymized. We only disclose your IP address to relevant software providers.

### 2.2.2 Cookies

## Consent Banner

We use a consent management platform (consent or cookie banner) on our website. The processing in connection with the use of the consent management platform and the logging of the settings you have made is based on our legitimate interest in accordance with Art. 6 (1) (f) GDPR to provide you with our content according to your preferences and to be able to prove your consent(s). The settings you have made, the consents you have given and parts of your usage data are stored in a cookie. This ensures that it is kept for further website visits and that your consents continue to be traceable. You can find more information about this under the section "Necessary cookies".

The provider of the consent management platform acts on our behalf and is strictly bound by our instructions (processor). A data processing agreement in accordance with Art. 28 GDPR has been concluded.

## Necessary Cookies

On our website, we use cookies which are necessary in order for the site to function.

Cookies are small text files that can be placed on your computer or mobile device by websites that you visit.

A distinction is made between session cookies, which are deleted as soon as you close your browser, and permanent cookies, which are stored beyond the individual session.

We do not use these necessary cookies for analysis, tracking or advertising purposes.

In some cases, these cookies only contain information on certain settings and cannot be linked to a person. They may also be necessary to enable user guidance, security and implementation of the site.

The legal basis for using these cookies is our legitimate interest according to Art. 6 (1) (f) GDPR.

You can set your browser to inform you about the placement of cookies. This is in order to make the use of cookies transparent for you.

You can also delete cookies or prevent the setting of new cookies at any time by using the appropriate browser settings.

Please note that if you delete certain cookies, our web pages may not be displayed correctly and some functions may no longer be available.

| Cookie name | Provider  | Purpose  | Maximum Storage Period | Adequate level of data protection |
|-------------|-----------|--|------------------------|-----------------------------------|
| Cookieyes   | CookieYes | The cookie saves the visitors' preferences selected in the Cookie Box. | 1 Year                 | Adequacy decision for Denmark     |

## Functional cookies

Functional cookies help perform certain functionalities like delivering and displaying the content of the website in a certain way.

The legal basis for this data processing is your consent if you have given your consent via our consent banner. You can withdraw your consent at any time. [If you wish to withdraw your consent, please click on the blue round icon at the bottom left of the screen on the website to change the relevant settings via our banner.](#)

| Cookie name             | Provider  | Purpose   | Maximum Storage Period | Adequate level of data protection |
|-------------------------|-----------|---|------------------------|-----------------------------------|
| wpEmojiSettingsSupports | WordPress | WordPress sets this cookie when a user interacts with emojis on a WordPress site. It helps determine if the user's browser can display emojis properly.             | Session storage        | No third-country data transfer    |
| elementor               | elementor | The website's WordPress theme uses this cookie. It allows the website owner to implement or change the website's content in real-time.                              | Session storage        | No third-country data transfer    |
| PII_language            | PolyLang  | PolyLang sets this cookie to remember the language the user selects when returning to the website and get the language information when unavailable in another way. | 1 year                 | No third-country data transfer    |

#### Google Analytics and Google Tag Manager

We use the web analysis tool "Google Analytics" and "Google Tag Manager" to design our websites in accordance with the needs of our visitors. Google Analytics creates usage profiles based on pseudonyms. This allows us to recognise returning visitors and count them as such. Google Tag Manager is used to manage the analytical tags on the website.

We are supported by Google Ireland Limited as a processor in accordance with Art. 28 GDPR when using the Google Analytics service. The data processing by Google may also take place outside the EU or the EEA (especially in the USA). With regard to Google, an adequate level of data protection is ensured due to the adequacy decision (EU-U.S. Data Privacy Framework). Google is also obliged to conclude standard contractual clauses with further sub-processors.

The legal basis for this data processing is your consent if you have given your consent via our consent banner. You can withdraw your consent at any time. [If you wish to withdraw your consent, please click on the blue round icon at the bottom left of the screen on the website to change the relevant settings via our banner.](#)

| Cookie name | Provider | Purpose  | Maximum Storage Period | Adequate level of data protection   |
|-------------|----------|--|------------------------|---|
| _ga         | Google   | Gather information about how visitors interact with a website, such as pages viewed, time spent on each page, and user interactions. This data helps us to analyze and improve site performance and user experience. | 2 years                | For transfers to the U.S., an adequate level of data protection is ensured due to the certification of the provider under the adequacy decision (EU-U.S. Data Privacy Framework). |
| _gtm        | Google   | Streamline and manage the analytic tags on the website.  | 1 year                 | For transfers to the U.S., an adequate level of data protection is ensured due to the certification of the provider under the adequacy decision (EU-U.S. Data Privacy Framework). |

### 2.2.3 Links to other websites

On our website, we provide links to third-party websites (e.g., links to our global website, LinkedIn and YouTube). Once you click on the link, the third-party content is immediately reloaded. We have no control over further data processing or tracking by the third party. If you do not wish to be redirected to other sites, please do not click on the respective link.

### 2.2.4 Contact form

We also process the following data if you use the contact form on our website. This processing is done in order to respond to your inquiry.

- General personal data, including your name, contact details and the information you provide in your inquiry, cf. GDPR Art. 6(1)(f).

We will delete your data no later than 6 months after your inquiry is completed, unless the data is relevant to an ongoing customer relationship, after which we will process the data as long as the customer relationship is current.

### 2.2.5 Service providers/Processors

We share your data with service providers that support us in the operation of our websites and the associated processes as part of data processing on behalf of the controller pursuant to Art. 28 GDPR. These are, for example, hosting service providers. Our service providers are strictly bounded by our instructions and are contractually obligated accordingly.

### 2.3 Job applicants

To process application material that we receive unsolicited or in connection with a job advertisement, we process the following general categories of personal data:

- General personal data that we receive from you in connection with your application, including e.g., name, contact information, job history, education, skills, photo etc. cf. GDPR art. 6(1)(b) and GDPR art. 6(1)(f).
- General personal data that we collect from publicly available media, including e.g., LinkedIn, Facebook etc. cf. GDPR art. 6(1)(b) and GDPR art. 6(1)(f).
- General personal data that we collect from your references if you have given your consent, or public authorities such as criminal records for certain positions and necessary circumstances, based either on our legal obligation or legitimate interest according to Data Protection Act § 8.
- General personal data that we collect in connection with personality type tests or similar tests if you have given your consent, cf. GDPR Art. 6(1)(a).

If we process special categories of personal data (e.g., health data) about you or your CPR number because you have provided such data in your application material without request, we consider your submission of the application material as your consent to the processing of this data in connection with the recruitment process, cf. GDPR article 9(2)(a) and section 11(2) no. 2 of the Data Protection Act.

To the extent necessary to complete the recruitment process, we may disclose your personal data to our software suppliers or business partners, including for example recruitment consultants and test providers.

If your application does not lead to employment with us, we generally store your application material for up to 6 months after the recruitment process is completed to document the recruitment process.

In exceptional circumstances, we may store your personal data for a longer period if we consider it necessary to defend ourselves against a possible legal claim, cf. GDPR Art. 6(1)(f).

If we wish to store your application material for the purpose of possible future employment, we ask for your consent, cf. GDPR Art. 6(1)(a).

If you have sent an unsolicited application, we will store it until we have assessed the application and whether it is relevant to store it for possible future employment. If we wish to store your application for a period to be able to contact you, we ask for your consent, cf. GDPR art. 6(1)(a).

### 2.4 Direct marketing

To keep you updated with relevant news and offers, we process the following general categories of personal data about you:

- General personal data such as your name and contact details, if you have given your consent, cf. GDPR art. 6(1)(a) and section 10 of the Marketing Act.

To target and improve our marketing, we process the following general categories of personal data about you:

- General personal data such as your interest in the newsletter content, which articles you click on, etc. (spy pixels), cf. GDPR Art. 6(1)(f).

To the extent necessary, we disclose your personal data to our software suppliers and business partners.

As a rule, we process your personal data until you unsubscribe from our marketing. If you unsubscribe from our marketing, we will store your consent log for 3 months to document your consent, cf. GDPR art. 6(1)(f).

## 2.5 TV surveillance

To prevent crime, we process visitors' personal data in connection with our TV surveillance, which is set up at the main entrance area of our head office. There is visible signage in connection with the surveillance.

In this connection, we process photo and video material of visitors' movements around the main entrance at our head office. The processing is based on our legitimate interests in crime prevention, cf. GDPR Art. 6(1)(f).

We share CCTV footage with relevant software vendors and the police as needed.

TV surveillance recordings are deleted after 30 days according to the TV Surveillance Act, unless there is a need to store them for a longer period for the purpose of, for example, disclosure to the police or similar.

## **3 IF YOU WISH TO WITHDRAW CONSENT**

If we process your personal data based on your consent, you can withdraw your consent at any time by contacting us as stated above in section 1 or by following the instructions on our website, in newsletters etc.

If you withdraw your consent, please note that this does not affect the lawfulness of our processing up to the time you withdraw your consent, and that in special cases we may be entitled to continue processing your personal data, for example to defend ourselves against a possible legal claim.

## **4 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

To the extent necessary to fulfil the purposes of processing your personal data, we may transfer personal data to international organizations or companies established in countries outside the EU/EEA. We only make such transfers if we have an adequate legal basis for this, including, for example

- If the EU Commission has assessed that the security of the third country in question is adequate in accordance with GDPR Art. 45,
- If there are otherwise necessary guarantees for security, including, for example, by entering the EU Commission's standard contracts in accordance with GDPR Article 46, or
- If one or more of the exceptions in GDPR Art. 49 apply.

## 5 SAFETY MEASURES

We prioritize personal data security very highly and therefore have a strong focus on processing your personal data in accordance with applicable data protection legislation.

To protect your personal data in the best possible way, we continuously assess the risks that may be associated with our processing of your personal data. We pay particular attention to protecting your personal data against discrimination, identity theft, financial loss, loss of reputation and confidentiality.

In the event of a security breach involving a high risk to your rights, we will notify you of the security breach as soon as possible under the circumstances.

## 6 YOUR RIGHTS

When we process your personal data, you have the following rights towards us. If you wish to exercise these rights, you are always welcome to contact us as described above in section 1.

- **Access.** You have the right to access and receive a copy of the personal data we process about you.
- **Rectification.** If we have registered incorrect information about you, you are generally entitled to have such incorrect personal data about you rectified.
- **Erasure.** You have the right to have the personal data we process about you deleted, provided that one of the reasons listed in detail in Art. 17 GDPR applies.
- **Restriction of processing.** You have the right to have the processing of your personal data restricted to storage, if one of the requirements listed in Art. 18 GDPR is met, e.g., if you have objected to the processing.
- **Objection.** If data is collected based on Art. 6 (1) (f) GDPR (data processing for the protection of legitimate interests) or based on Art. 6 (1) (e) GDPR (data processing for the protection of public interests or in the exercise of official authority), you have the right to object to the processing at any time for reasons arising from your particular situation. We will then no longer process the personal data unless there are demonstrably compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.
- **Data portability.** In specific cases, which are listed in detail in Art. 20 GDPR, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to have this personal data transferred from one controller to another without hindrance.

You can read more about your rights on the Danish Data Protection Agency's website: [www.datatilsynet.dk](http://www.datatilsynet.dk).



## **7 COMPLAINT OPTIONS**

You have the right to file a complaint with the Danish Data Protection Agency if you are dissatisfied with the way we process your personal data. However, we hope that you will always contact us first so that we can find a reasonable solution.

You can find the Danish Data Protection Agency's contact information and complaint guide at [www.datatilsynet.dk](http://www.datatilsynet.dk).

### **Contact details of our data protection officer**

Our external data protection officer will be happy to provide you with information on the subject of data protection under the following contact details:

FIRST PRIVACY GmbH  
Konsul-Smidt-Straße 88  
28217 Bremen

Web: [www.first-privacy.com](http://www.first-privacy.com)

E-Mail: [office@first-privacy.com](mailto:office@first-privacy.com)

If you contact our data protection officer, please also state the controller for the data processing named at the beginning of this Privacy Policy”.