

Privacy Policy of Silhorko-Eurowater A/S

Introduction

In order to protect consumers in Europe, the EU has drafted Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation abbreviated **GDPR**) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

The new Regulation (EU) 2016/679 of 27 April 2016, hereinafter referred to as **GDPR**, will enter into force on 25 May 2018, replacing the previous Directive 95/46/EC of 1995.

In connection with our business operation, we collect and process data of various nature. This Privacy Policy describes which data we collect, why we collect them, and for what purpose we apply them.

If you have any questions or need further information, please contact our personal data controller:

Contact information on personal data controller

Henrik Møller
Phone 87 93 83 34
E-mail: gdpr.dk@silhorko.dk

Data responsible company

Silhorko-Eurowater A/S
Århusvej 79
8660 Skanderborg, Denmark
CVR No. 39 17 65 13

Processing of personal data

We collect personal data given to us in connection with the general business processes of production, sales and service of water treatment plants.

It is contact information such as name, address, telephone, E-mail, and we store this data together with the purchase history on goods and services.

We treat the personal data in order to meet our contractual obligations in connection with delivery and purchase of products and services as well as obligations under applicable legislation.

This constitutes our legal basis for treatment. Without this information, we cannot communicate on deliveries and purchases of water treatment plants and services.

Deadlines for deletion/storage

We keep personal data in the ordinary course of business as long as such data are relevant. Some personal data are stored for a minimum of five years for reasons of legislation, including Danish accounting law. Often, we store data longer with a view to the customers' need for service and spare parts for the water treatment plants supplied. As a basis, data are stored until the water treatment systems in question have been taken out of operation and we have received information on this. When we no longer need the personal data for the purpose we collected them, we will delete these data.

Your rights under the GDPR

In connection with our processing of your personal information, you have several rights:

- The right to receive information about how we process your personal data (disclosure obligation).
- The right to gain access to your personal data.
- The right to have incorrect personal data corrected.
- The right to have your personal data deleted.
- The right to object to your personal data being used in direct marketing.
- The right to object to automated individual decisions, including profiling.
- The right to move your personal data (data portability).

All of the above rights shall be handled manually by contacting our personal data controller*.

We can reject requests that are unfairly repetitive, require disproportionate technical intervention (e.g. developing a new system or substantially changing an existing practice), affect the protection of other people's personal information, or something that will be extremely impractical (for example requests for data found as backups).

If we can correct data, we will of course do this free of charge – unless it requires disproportionate efforts. We strive to maintain our services in a way that protects data from inaccurate or harmful destruction. Therefore, when we delete your personal data from our services, we may not always be able to delete corresponding copies from our archive servers at once, and the data may not be removed from our backup systems.

We do everything we can to ensure that your personal data are processed satisfactorily and that your rights are protected in the best possible way and we regularly review our procedures and handling of personal data.

If you believe that we do not process your personal data and your rights in accordance with law, please contact us.

If you continue to believe that we do not treat your inquiry and your rights in accordance with law, you may at any time lodge a complaint with the Danish Data Protection Agency (*Danish: Datatilsynet*) via the homepage: <https://www.datatilsynet.dk/borger/klage-til-datatilsynet/>

Information we transfer

We do not disclose personal data to companies, organizations, and individuals outside our company. The exception is the following situations:

- With your consent
We disclose personal data to companies, organizations or individuals outside our company, if we have your consent. We request that you have actively chosen such transfer of all personal data.
- For remote data processing
We disclose personal data to our partners in cooperation or other trusted companies or individuals, who treat them on our behalf. Their processing is based on our instructions and in accordance with our privacy policy and other applicable privacy and security measures such as our data processing agreement.
- For legal reasons
We disclose personal data to companies, organizations or individuals outside our company, if we in good faith believe that access, use, preservation, or disclosure of data is required for the following reasons:
 - Observation of applicable laws, regulations, legal proceedings, or legitimate requests from public authorities.
 - Enforcement of current service terms including investigation of potential violations.
 - Registration, prevention, or otherwise protection against fraud, security, or technical problems.
 - Indemnification of our company in relation to public rights, property, or safety as required or permitted by law.

Information security

We make an effort to protect the company and our customers against unauthorized access, change, disclosure, destruction of the personal data stored by us.

We have implemented the following organizational and technical measures in general throughout our company:

- Antivirus on all IT systems processing personal data.
- Backup of all IT systems processing personal data.
- Application of industry-specific IT systems for the treatment activities.
- Access restriction on personal data, so that access is only given where necessary.
- Data-processing agreements with suppliers that process personal data on behalf of our company.
- Statements of secrecy with staff who need to process personal data.
- Guidance on the safe processing of personal data and information assets for staff with access to information systems.
- Implementation of the above risk assessment as well as documentation of all systems processing personal data to ensure an informed basis for the security standard of personal data processing in our company.

Compliance and cooperation with supervisory authorities

We review regularly our compliance with our own personal data policy. When we receive formal complaints in writing, we will contact the sender to follow up on the complaint. We cooperate with the relevant regulatory authorities such as the Danish Data Protection Agency (*Danish: Datatilsynet*) to resolve complaints about the transfer of personal data, which we cannot solve directly.

Revision

This Personal Data Policy shall be reviewed on a continuous basis minimum once a year.

Stilling, 24 May 2018

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