



Dinex Privacy Policy

Information on processing of personal data

1 Introduction

This Privacy Policy sets out how Dinex collects and processes your personal data as part of the operation of our business and the activities described in Section 3 below.

2 Data Controller

DINEX A/S is the controller in respect of the processing activities described in this Privacy Policy unless otherwise mentioned below in Section 3 below.

If you have any questions to this Privacy Policy or our processing of your personal data as described in Section 3 below, please contact us here:

DINEX A/S

CVR-no.: 10504473

Fynsvej 39

5500 Middelfart

E-mail: hr@dinex.dk

3 Processing activities

3.1 Sales of goods and services

In connection with sales of goods and services, we process personal data about contact persons at customer organisations in order to ensure correct deliveries and administration of the customer relationship.

3.1.1 Categories of personal data

- Name
- Working Email address
- Working Telephone number
- Working Address
- Name of the company you represent
- Username and password for our webshop
- Logdata for our webshop

We typically receive this information either directly from you or from the company you represent, or from group companies.

3.1.2 Legal basis

The legal basis for our processing of personal data is article 6(1), paragraph (f) of GDPR, as the processing is necessary to pursue our legitimate interests in managing our customer relationships effectively.

3.1.3 Recipients of personal data

The data may be disclosed to other companies in the group of which Dinex is a part, as well as to suppliers and logistics companies as necessary to deliver the goods and services.

Furthermore, we make the data available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

In connection with the processing, the personal data may be transferred to countries outside the EU/EEA (third countries). These countries include USA, China, Russia and Turkey. Where relevant, the transfer will be based on the derogation in article 49(1), paragraph (c) or (e) of GDPR. If neither of these derogations apply, we ensure that your rights are protected, and that the level of protection is maintained in connection with these data transfers, for example through standard contracts approved by the European Commission, see Article 46(2), paragraph (c), of the GDPR. For a copy of these standard contracts, please contact us (see Section 2 above).

3.1.4 Retention

Personal data is retained for five years from the end of the year of the latest transaction with the organisation you represent.

3.2 Newsletters and other marketing communications

When you sign up for our newsletters or to receive other types of marketing material from us, we process personal data about you in order to be able to send such material to you and in order to be able to document our compliance with applicable marketing legislation.

3.2.1 Categories of personal data

- Name
- (Working) Email address
- Information about your consent to receive marketing materials (wording, scope and date of the consent) and, where relevant, your withdrawal of this consent
- Information about actual newsletters and other material sent to you.

3.2.2 Legal basis

The legal basis of our processing of personal data article 6(1), paragraph (f) of GDPR, as the processing is necessary to pursue our legitimate interests in communicating with and sending newsletters, product information and other types of marketing material to persons having consented to receive such information.

3.2.3 Recipients of personal data

Data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

In connection with the processing, the personal data may be transferred to countries outside the EU/EEA (third countries). These countries include USA. We ensure that your rights are protected, and that the level of protection is maintained in connection with these data transfers, for example through standard contracts approved by the European Commission, see Article 46(2), paragraph (c), of the GDPR. For a copy of these standard contracts, please contact us (see Section 2 above).

3.2.4 Retention

If you withdraw your consent to receive marketing material from us, we will stop sending marketing material immediately after receiving information on your withdrawal of the consent. Furthermore, we will stop sending marketing material if we have not used your consent to send such material to you for a period of 12 consecutive months, as the consent would then be considered invalid.

However, we will retain personal information about you for two years from the end of the year in which you withdrew your consent or the consent became invalid. We do so in order to be able to document that we did have a valid consent at the point in time when we sent marketing material to you.

3.3 Suppliers and business partners

We process personal data about contact persons at suppliers and business partners in order to be able to manage our relationship with suppliers and business partners effectively.

3.3.1 Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Name of the company you represent

We typically receive this information either directly from you or from the company you represent, or from group companies.

3.3.2 Legal basis

The legal basis of our processing of personal data article 6(1), paragraph (f) of GDPR, as the processing is necessary to pursue our legitimate interests in managing our relationships with suppliers and business partners effectively.

3.3.3 Recipients of personal data

Data may be disclosed to other companies in the group of which Dinex is a part.

Furthermore, data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

In connection with the processing, the personal data may be transferred to countries outside the EU/EEA (third countries). These countries include USA China, Russia and Turkey. Where relevant, the transfer will be based on the derogation in article 49(1), paragraph (c) or (e) of GDPR. If neither of these derogations apply, we ensure that your rights are protected, and that the level of protection is maintained in connection with these data transfers, for example through standard contracts approved by the European Commission, see Article 46(2), paragraph (c), of the GDPR. For a copy of these standard contracts, please contact us (see Section 2 above).

3.3.4 Retention

Personal data is retained for five years from the end of the year of the latest transaction with the organisation you represent.

3.4 Sanctions screenings

In order to comply with any economic or trade sanction, embargo or other prohibition or restrictive measure (“sanction”) and any export or trade control in relation to export controlled items, including dual use items, (“export control”) imposed by any authority or national government of any relevant state or any regional or international organisation, including in Denmark, the EU, the UK and the USA, we process personal data to verify the identity of our customers, suppliers and other business partners and or the beneficial owners of such legal entities. We use the information to perform screening against sanctions lists applicable for our business.

3.4.1 Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Information about direct or indirect ownership of our (prospective) customers, suppliers or business partners
- Other information considered necessary to confirm your identity.

Information about direct or indirect ownership may be obtained from public registers or other publicly available sources. Other information is obtained directly from you.

You should know that it is a requirement that you provide the above-mentioned personal data upon our request, as the information is necessary to ensure that we are not doing business and performing transactions with parties subject to sanctions. Failure to provide the data may result in rejection or termination of a business relationship.

3.4.2 Legal basis

The legal basis of our processing of personal data aside from national identification numbers is article 6(1), paragraph (f) of GDPR, as the processing is necessary to pursue our legitimate interests in ensuring compliance with relevant sanctions.

3.4.3 Retention

As a general rule, we will retain the information for the duration of the relationship and for five years from the end of the year of the latest transaction. However, specific schemes may require us to retain information for longer, as well as we may be required to confirm or update the information with certain intervals.

3.5 Operations of our website

When you visit our website, we process personal information, we collect personal data about you through the use of cookies and similar tracking technologies. We use this information to manage our website, ensure adherence with your cookie preferences, and to ensure a properly functioning, relevant and secure website.

3.5.1 Categories of personal data

- Electronic identification data (IP address, cookies, etc.)
- Information on your preferences related to the website (cookie consent, language preferences, etc.)
- Information on your use of the website, e.g., how you move around the website and which links you activate.

3.5.2 Legal basis

The legal basis of our processing of personal data aside from national identification numbers is article 6(1), paragraph (f) of GDPR, as the processing is necessary to pursue our legitimate interests in ensuring an effective, stable, relevant and secure website.

3.5.3 Recipients of personal data

Data is shared with our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

In addition, the data will be shared with the following third parties: Third parties having cookies on our website.

In connection with the processing, the personal data may be transferred to countries outside the EU/EEA (third countries). These countries include USA. We ensure that your rights are protected, and that the level of protection is maintained in connection with these data transfers, for example through standard contracts approved by the European Commission, see Article 46(2), paragraph (c), of the GDPR. For a copy of these standard contracts, please contact us (see Section 2 above).

3.5.4 Retention

The retention period depends on the purpose and the individual cookie. Please see the cookie declaration on our website for further information.

3.6 Recruitment

When you apply for a position with Dinex or if you are otherwise nominated as a job candidate (for example by head-hunters with whom we work), we process personal data about you for the purpose

of assessing you against other candidates to identify the candidate we - from an overall perspective - consider to be the best fit for the position in question.

3.6.1 Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Application and CV, including information on your educational background, current and prior employment, specific skills and competencies as well as any other information provided by you in your application or CV or otherwise during the recruitment process.
- Skills and personality test results
- References

We will primarily obtain the information directly from you. However, we may collect information from publicly available sources, such as open parts of your profiles on social media. Furthermore, we may obtain information from persons, whom we have your consent to contact for references.

3.6.2 Legal basis

The legal basis for collection of references is your consent as set out in Article 6(1), paragraph (a), of GDPR.

The legal bases for any other processing of personal data for the purpose of recruitment are:

- Article 6(1), paragraph (b), of GDPR, as the processing constitutes necessary steps prior to possibly entering into a contract with you.
- Article 6(1), paragraph (f), of GDPR, as the processing is necessary to pursue our legitimate interest in assessing job candidates to identify the candidate(s) we – from an overall perspective – consider to be the best fit for specific position(s) with Dinex.

3.6.3 Recipients of personal data

Data is shared with our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.6.4 Retention

If the recruitment process leads to you being employed by Dinex, the personal data collected during the recruitment process is transferred to your personnel file and retained as set out in our privacy notice for employees, which will be made accessible to you upon commencement of your employment with Dinex.

For other candidates, personal data may be retained for up to 12 months from the end of the month we inform you that we will not be offering a position with Dinex (or you withdraw from the recruitment process).

We may, however, request your consent to store your application and CV for an extended period, in which case we will retain the information in accordance with the consent provided by you.

3.7 Other situations

If we interact with you for any other purpose than the purposes described in sections 3.1 - 3.6 above, for example to respond to queries or handle other matters involving you, we will process personal data about you as necessary for handling the specific matter.

3.7.1 Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Any other information you provide (e.g., information related to the topic of your query), and/or information we receive from third parties in connection with the handling of your query.

3.7.2 Legal basis for the processing

As a general rule, the legal basis for our processing will be Article 6(1), paragraph (f), of GDPR, as the processing is necessary for pursuing our legitimate interests in handling incoming queries.

Depending on the nature of your query, other legal bases may apply.

3.7.3 Recipients of personal data

Data may be disclosed to relevant third parties, such as external (legal) advisors or governmental agencies where appropriate.

Furthermore, data is made available to our IT suppliers (data processors), who store the data for us and process the data in accordance with our instructions.

3.7.4 Retention

If our interaction with you involves financial transactions, we will retain the information for five years from the end of the year of the latest transaction in order to comply with our obligations pursuant to the Danish Bookkeeping Act.

Otherwise, we will retain the information for three years from the end of the year of the latest interaction.

4 Your rights

You are entitled at all times to exercise your rights under the data protection legislation in force at the given time:

- **Withdrawal of consent:** Where our processing of personal data about you is based on your consent (Articles 6(1), paragraph (a) and 9(2), paragraph (a) of GDPR) you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- **Access:** You have the right to obtain access to the data we process about you and a number of additional data.
- **Rectification:** You have the right to have personal data about you rectified.
- **Erasure:** In special circumstances, you have the right to have personal data about you erased, before the time for our ordinary erasure.
- **Restriction:** In certain cases, you have the right to restriction of processing of your personal data. If the right applies, we may then only process the data – except for retention – with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another person or for reasons of important public interest.
- **Data portability:** In certain cases, you have the right to receive a copy of the personal data you have provided in a structured commonly used and machine-readable format.
- **Objection:** Where the processing is based on Article 6(1), paragraph (f) of GDPR (legitimate interests), you have the right to object to the processing at any time, on grounds relating to your particular situation. **In particular, you have an unconditional right to object to processing of your personal data for the purpose of direct marketing at any time.**

If you wish to exercise your rights, please contact us at hr@dinex.dk. Your request will be processed in accordance with the legislation in force at the given time. To the extent necessary, we will contact you and ask for additional information required to handle your request correctly.

Please be aware that certain conditions and restrictions apply for some of the rights. Therefore, we might not be required – or even permitted – to meet your requests.

If you would like to learn more about your rights, please visit the website of the Danish Data Protection Agency, www.datatilsynet.dk

5 Making a complaint

If you believe that our processing of personal data about you constitutes an infringement of GDPR or the Danish Data Protection Act, you have an unconditional right to file a complaint to the Danish Data Protection Agency, Carl Jacobsens Vej 35, DK-2500 Valby. A complaint may be filed by email to dt@datatilsynet.dk or through the website of the Danish Data Protection Agency www.datatilsynet.dk.

We do, however, recommend that you contact us, before you file a complaint with the Data Protection Agency. Our contact information can be found in section 2 above.

6 Updating our privacy policy

Dinex may update this privacy policy on an ongoing basis when this is necessary to provide a fair description of our processing of personal data.

In the event of material changes to our processing of your personal data already in our possession, you will be notified directly of the update (e.g. by email).

This Privacy Policy was last updated in April 2024.