

Privacy Policy

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At AkademikerPension and our associated subsidiaries we are, as data controllers, obliged to and wish to protect the information we have about you. In this Privacy 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. For example, you can read more about how we collect, process, disclose and otherwise handle personal data.

Personal data is information about you or information that can be used to identify you. This could, for instance, be your name, address, telephone number or social security number, but also more unique characteristics such as an IP address on your computer. The information is divided into different tabs, for you to get the information that relates to you easily.

AkademikerPension

Akademikernes
Pensionskasse
Smakkedalen 8
DK-2820 Gentofte

Tlf: +45 3915 0102
akademikerpension.dk
CVR nr. 20766816

Last updated 5 November 2020.

Data controller

AkademikerPension

Smakkedalen 8

2820 Gentofte

VAT/CVR.no.: 20766816

Tel.: +45 3915 0102

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Contact information of our DPO (Data Protection Officer):

Janni Ottogreen Sejrbø

dpo@akademikerpension.dk

For "MEMBERS"**The purpose of processing your personal data:**

Administration of your pension scheme, including: admission to AkademikerPension, advice regarding your pension scheme, changes, claims handling in connection with limitation of earning capacity or death, payment, communication with you as a member, tests in **connection** with development of our member system, compliance with legal obligations, money laundering procedures in accordance with legislation, and marketing.

What data is collected:General personal data:

Name, address, telephone number, email, social security number (CPR), information about your employer, information about your pensionable salary, marital status, tax, social conditions (e.g. information from Udbetaling Danmark whether you, your spouse, partner or member of your household receives any income-related benefits), accounting information, payment information, property information, information about your right to pay an increased amount to your retirement savings plan, information about your agreements with AkademikerPension.

In addition, we also process:

- Current and historical data about your pension scheme with us and 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 related to your behaviour 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 meeting 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: www.akademikerpension.dk/arkiv/cookies

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Sensitive personal data:

Health data

Where do we collect personal data:

We collect personal data directly from you as a member or from your employer, but personal data is also collected from:

- Publicly available registers
- Public authorities
- The CPR-register
- SKAT and the Danish Tax Agency
- Udbetaling Danmark
- PensionsInfo
- Banks
- Other pension companies
- Insurance & Pension (IPD) (the EDI system for transfer of pension scheme)
- Health data is collected from your own doctor, hospital, specialist.

Who do we share personal data with:

We only share your personal data if we are obliged to, entitled to, or have your consent to do so. We only share your personal data with your employer, PensionsInfo, the CPR-register, Udbetaling Danmark, the Danish Tax Agency, Insurance & Pension (the EDI system for transfer of pension scheme), our business partnerS in connection with holding of general meetings and board meetings, or sending out newsletters and general information, the State Prosecutor for Serious Economic and International Crime (SØIK) and the Danish Financial Supervisory Authority in relation to our obligations in accordance with the money laundering provisions, Falck Healthcare if you have a health scheme. In addition, we share your health data with a specialist, doctor or hospital based on your explicit consent in specific situations.

The legal basis for processing of personal data

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We process your personal data if:

- The processing is necessary to comply with a legal obligation.
- The processing is necessary for the establishment, exercise, or defence of legal claims.
- The processing is necessary to be able to fulfil the pension agreement with you as a member (contractual obligation).
- The processing is necessary for us or a third party to pursue a legitimate interest, e.g., analyses and system development.
- The processing is based on your consent.
- Social security number (CPR) is processed based on the Danish Data Protection Act, section 11 (2).

How long is the personal data stored for:

We store your personal data if you have an active pension policy with us, and up to 10 years after you are no longer a member of AkademikerPension, to be able to process possible complaints.

We store your payment information current year plus 5 years cf. the Bookkeeping Act.

Personal data retrieved as a part of our obligations in accordance with the provisions of the Danish Anti-Money Laundering Act (KYC) is stored for 5 years after you are no longer a member of AkademikerPension.

Personal data outside the EU

Your personal data is as a general rule only processed within the EU/EEA, and we do not transfer the data to countries outside the EU/EEA. Likewise, we do not allow our partners (data processors) to transfer personal data outside the EU/EEA, but there may be individual data processors or sub-data processors that are located outside the EU. 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. Otherwise, the transfer will take place on the basis of the EU Standard Contractual Clauses. This is the case with data processors in the UK and USA.

Your rights as a member of AkademikerPension

The General Data Protection Regulation contains 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.

The procedure for members is that we provide you with the document in your inbox and notify you via e-Boks when it is ready. You can ease our turnaround time by specifying if you wish access to specific data or time periods.

You have 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.

As a member, you can always correct your email and telephone number by logging on to our website. We automatically receive information about name, address, marital status etc. from the CPR-register, when changes occur. This means that when you report your changes to the citizen service centre, we will receive them automatically. We receive information about your salary and pension contribution from your employer. If there are any changes to this information, you should therefore contact your employer.

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.

If you are a member, we need certain information about you to be able to administer your pension scheme and comply with our legal obligations. In such case, you will often not be able to have your personal data deleted prematurely. You can

always delete your email and your telephone number by writing us or by logging into your profile at AkademikerPension.dk.

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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:

1. If the processing is based on "legitimate interest" and special circumstances apply to you.
2. 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, e.g., your bank or similar. This can also be an option if you wish to move your pension scheme to another company.

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 Privacy Policy.

If the processing of your personal data is based on your consent in connection with a medical assessment or a transfer of your pension, this will not affect the case 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 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):

Janni Ottogreen Sejrbø

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.

Specifics regarding 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 makes 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 categorised 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.

For "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:

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).

The information could be: name, address, telephone number, email, information about your former employers and areas of responsibility, information about education and personal qualifications.

If you have completed a personality test in the recruitment process, we will receive a personality profile from our external partner Kjerulf & Partnere, which is based on the results from the personality test.

If you have provided references in your application or later in the process, we will receive information about previous employment and work-related information about you from your references.

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.

Where do we collect personal data:

We only collect the information you submit with your application, but if you give consent to collect information from references the information we receive will be included in the processing.

If you have completed a personality test in the recruitment process, we will receive a personality profile from our external partner Kjerulf & Partnere, which is based on the results from the personality test.

Who do we share personal data with:

We do not share your personal data.

The legal basis for processing of personal data:

The processing is necessary for us to pursue a legitimate interest (to find the most suitable candidate) and you have given your consent for us to process the data.

How long is the personal data stored:

We store your personal data for 3 months after the position is filled, if you are not employed. If you are employed, we will store your personal data for 5 years after the termination of your employment.

Personal data outside the EU

Your personal data is as a general rule only processed within the EU/EEA, and we do not transfer the data to countries outside the EU/EEA. Likewise, we do not allow our partners (data processors) to transfer personal data outside the EU/EEA, but there may be individual data processors or sub-data processors that are located outside the EU. 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. Otherwise, the transfer

will take place on the basis of the EU Standard Contractual Clauses. This is the case with data processors in the UK and USA.

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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.

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.

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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:

1. If the processing is based on "legitimate interest" and special circumstances apply to you.
2. 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 Privacy 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 you can read more about how to complain and the terms that apply to your complaint.

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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):

Janni Ottogreen Sejrbø

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.

For "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.

We collect the data we have received from our external partner Kjerulf & Partnere in connection with your recruitment process and the information added to your personnel file during your employment.

Information that will most often appear in the personnel file is: name, address, information in financial matters (including salary and bank information), age, education, courses, social security number (CPR), sick leave information (not health data), vacation, marital status, work tasks, tax information, photo, contact information for family members.

Where do we collect personal data:

We only collect the information you have submitted at the time of your employment and information which has been generated during the employment. We do not collect further information from others.

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Who do we share personal data with:

We do not share your personal data.

The legal basis for processing of personal data:

The processing is necessary to ensure documentation in the event of any legal disputes.

The processing is necessary to comply with a legal obligation we are subject to.

How long is the personal data stored for:

We store your personal data for 5 years after the termination of your employment.

Personal data outside the EU

Your personal data is as a general rule only processed within the EU/EEA, and we do not transfer the data to countries outside the EU/EEA. Likewise, we do not allow our partners (data processors) to transfer personal data outside the EU/EEA, but there may be individual data processors or sub-data processors that are located outside the EU. 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. Otherwise, the transfer will take place on the basis of the EU Standard Contractual Clauses. This is the case with data processors in the UK and USA.

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.

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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 cannot request access to letters, notes, emails etc. made or sent in a work context solely because you have been part of creating them or signing them. This is not information covered by the right of access, cf. the guidelines from the Danish Data Protection Agency.

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. This can, for example, be to supplement a personnel case with additional data.

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:

1. If the processing is based on “legitimate interest” and special circumstances apply to you.
2. If your personal data is processed for the purpose of direct marketing. Please contact us if you wish to exercise your right to object.

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We do not use the personal data we have about you as a former employee for marketing purposes.

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 Privacy 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 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.

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Contact information for DPO (Data Protection Officer):

Janni Ottogreen Sejrbø

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.

For "BUSINESS 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.

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

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.

Regarding CCTV at entrance areas; video material is stored.

Where do we collect personal data:

We only collect the information you submit to us or that we receive from your employer in connection with our cooperation.

Who do we share personal data with:

We do not share your personal data with anyone, but video material may be handed over to the Police for crime-solving purposes if necessary.

The legal basis for processing of personal data:

The processing is necessary to comply with a legal obligation we are subject to.

You have given your consent to the processing.

The processing of contact information is necessary for us as a company to pursue a legitimate interest and maintain contact and communication.

How long is the personal data stored for:

We store your contact information as long as you are employed in the company we cooperate with.

Regarding video material from CCTV's at entrance areas to our physical office located at Smakkedalen 8; video material is deleted 14 days after recording.

Personal data outside the EU

Your personal data is as a general rule only processed within the EU/EEA, and we do not transfer the data to countries outside the EU/EEA. Likewise, we do not allow our partners (data processors) to transfer personal data outside the EU/EEA, but there may be individual data processors or sub-data processors that are located outside the EU. 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. Otherwise, the transfer will take place on the basis of the EU Standard Contractual Clauses. This is the case with data processors in the UK and USA.

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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:

1. If the processing is based on "legitimate interest" and special circumstances apply to you.
2. 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.

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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 Privacy 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 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):

Janni Ottogreen Sejrbø

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.

REGARDING "SOCIAL MEDIA"**Facebook****Purpose and data responsibility**

AkademikerPension and Facebook are joint controllers for the collection of personal data related to you when you visit AkademikerPension's Facebook page.

Facebook and AkademikerPension thus have a so-called joint data responsibility when processing information related to you. This means that Facebook and AkademikerPension must allocate and determine the responsibility for complying with the legislation regarding the processing of your personal data.

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.

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 Facebook. 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.

When you visit our Facebook profile, Facebook collects and processes personal data about you by placing cookies. A cookie can recognise your equipment and provide information about your behaviour on the site. It does not matter if you have a Facebook profile or not.

If you do not have a Facebook profile, information about your device, location/geo data and information about your behaviour on and off Facebook, e.g. website visits, is collected.

If you do have a Facebook profile, information which you have given permission in connection with the creation of your profile is also collected, as for example reactions, comments and shares made by you and others. For more information, we encourage you to read Facebook's privacy policy. <https://www.facebook.com/policy.php>

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 Facebook page. The information is collected by Facebook storing cookies on your hard disk or other device.

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Who do we share personal data with:

We do not share your personal data in connection with your visit to AkademikerPension's Facebook page.

The legal basis for processing of personal data:

The majority of the collected information is processed by Facebook to target content to you. This information is not at 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 is necessary to pursue a legitimate interest (the ability to communicate with you directly) or it is based on your consent.

How long is the personal data stored for:

Information about your direct message will be deleted after 30 days by the Facebook page administrator if Facebook allows it. Facebook will, however, store the information in their database after AkademikerPension has deleted it. AkademikerPension does not have control over your other information, and if you wish to have your information on Facebook deleted you will have to delete your Facebook profile. Deleting your profile also means that your posts, photos and information will be deleted. Please note, however, that information about you shared by your friends or family will not be deleted.

Personal data outside the EU

Your personal data is as a general rule only processed within the EU/EEA, and we do not transfer the data to countries outside the EU/EEA. Likewise, we do not allow our partners (data processors) to transfer personal data outside the EU/EEA, but there may be individual data processors or sub-data processors that are located outside the EU. 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. Otherwise, the transfer

will take place on the basis of the EU Standard Contractual Clauses. This is the case with data processors in the UK and USA.

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Please note, that Facebook is an American company, for which reason the information Facebook has about you as a starting point can be located outside the EU/EEA. In this case, we refer to their Data Policy.

LinkedIn

Purpose and data responsibility

AkademikerPension and LinkedIn are joint controllers for the collection of personal data related to you when you visit AkademikerPension's LinkedIn page.

LinkedIn and AkademikerPension thus have a so-called joint data responsibility when processing information related to you. This means that LinkedIn and AkademikerPension must allocate and determine the responsibility for complying with the legislation regarding the processing of your personal data.

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.

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 LinkedIn. 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. The processing of this information is necessary to pursue a legitimate interest (the ability to communicate with you directly) or is based on your consent.

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.

The information is available to AkademikerPension via a function called LinkedIn Page Analytics. This function is standard if you have a LinkedIn page.

LinkedIn is a social network and online platform form for professionals. They handle and process personal data by, among other things collecting content, communication and other information you provide when you use their products, including the information you submit when you create and account, create and share content, write messages or communicate with others.

Read LinkedIn's privacy policy here: https://www.linkedin.com/legal/privacy-policy?_l=da_DK

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When you visit AkademikerPension's LinkedIn page, LinkedIn places a cookie on your equipment, e.g. PC, tablet or phone. By placing cookies, LinkedIn collects and processes personal data about you, as a cookie can recognise your equipment and provide information about your behaviour on the site. It does not matter if you have a LinkedIn profile or not.

If you do not have a LinkedIn profile, information about your device, location/geo data and information about your behaviour on and off LinkedIn, e.g. website visits, is collected.

If you do have a LinkedIn profile, information which you have given permission in connection with the creation of your profile is also collected, as for example reactions, comments and shares made by you and others.

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 from LinkedIn, as described above via a function called LinkedIn Page Analytics. This function is standard if you have a LinkedIn page.

Who do we share personal data with:

We do not share your personal data in connection with your visit to AkademikerPension's LinkedIn page.

The legal basis for processing of personal data:

The majority of the collected information is collected by LinkedIn to target content to you. This information is not at 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 is necessary to pursue a

legitimate interest (the ability to communicate with you directly) or is based on your consent.

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How long is the personal data stored for:

Information about your direct message will be deleted after 30 days by the LinkedIn page administrator if LinkedIn allows it. LinkedIn will, however, store the information in their database after AkademikerPension has deleted it.

AkademikerPension does not have control over your other information, and if you wish to have your information on LinkedIn deleted you will have to delete your LinkedIn profile. Deleting your profile also means that your posts, photos and information will be deleted.

Personal data outside the EU

Your personal data is as a general rule only processed within the EU/EEA, and we do not transfer the data to countries outside the EU/EEA. Likewise, we do not allow our partners (data processors) to transfer personal data outside the EU/EEA, but there may be individual data processors or sub-data processors that are located outside the EU. 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. Otherwise, the transfer will take place on the basis of the EU Standard Contractual Clauses. This is the case with data processors in the UK and USA.

Please note, that LinkedIn is an American company, for which reason the information LinkedIn has about you as a starting point can be located outside the EU/EEA. However, according to LinkedIn's own information the data controller is LinkedIn Ireland.

Twitter, Vimeo, YouTube

A number of third parties place cookies on your computer when you visit AkademikerPension's profiles on social media. The use of functions from these third parties constitutes a legitimate interest for AkademikerPension to make AkademikerPension visible as a workplace and to market the company to potential and existing members and partners.

AkademikerPension has profiles on Twitter, Vimeo og YouTube

Please find the links for the privacy policies of relevant third party cookies:

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

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

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

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AkademikerPension only processes the information about which you submit to us in connection with a comment, “like” or a direct message from you to us on our profile. 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.

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.

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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:

1. If the processing is based on "legitimate interest" and special circumstances apply to you.
2. 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 Privacy 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

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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 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):

Janni Ottogreen Sejrbø

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.