

Privacy policy for Pharmadanmark (ENGLISH)

This privacy describes how we process your personal data. Any kind of information that can be attributable to you is personal data. We process personal data that we have either received from you or any third party.

1. Data controller

Pharmadanmark is responsible for the processing of the personal data collected about members, employees, labour union representatives, participants in our events, recipients of our newsletters and member magazines, visitors to our website, counterparties, and other parties. We ensure that the processing of your personal data is in accordance with existing legislation.

Our contact information:

Pharmadanmark
Company registration number.: 65 25 03 14
Gammel Kongevej 60, 9.
1850 Frederiksberg C
Telephone: 39 46 36 00

When Pharmadanmark acts as a data processor, we will always be subject to a written data processing agreement that describes how we protect personal data.

2. The various types of processing

Our processing activities and the purposes of our processing activities are described below.

2.1. Your membership

When you are a member of Pharmadanmark, we process ordinary, confidential, and sensitive personal data about you. The purpose of our processing of your personal data is to manage your membership, which includes, among other things, salary-, conditions-, and contract negotiations, other advice, various events, organisation, offers from our business partners, etc. We also collect your personal data for the purpose of reporting your membership to SKAT.

Pharmadanmark and The Danish Pharmaceutical Association also cooperate as joint data controllers to produce annual salary statistics for pharmacists employed by pharmacies. In this context, Pharmadanmark is responsible for complying with the General Data Protection Regulation ("GDPR"), in relation to our members' personal data.

We process your personal data based on article 6(1)(b-c) of the GDPR as the processing is necessary for the fulfilment of the contract of your membership and for the compliance with the Danish Bookkeeping Act. In addition, we process your personal data based on article 9(2)(d) of the GDPR and article 11(2)(4) in the Danish Data Protection Act as the processing is necessary to pursue our legitimate interest as a labour union. Furthermore, we process your personal data based on article 12(2) of the Danish Data Protection Act as the processing is necessary for us or others to pursue a

legitimate interest arising from legislation or collective agreements. We also process your personal data based on article 9(2)(f) of GDPR when we provide you with legal assistance as our processing is necessary for the establishment of a legal claim. Finally, we process your personal data based on your consent as referred to in article 9(2)(a) when we transfer your personal data to our business partners.

We store your basic data for 5 years after you have left our labour union in accordance with the rules of the Danish Bookkeeping Act. We store your member cases for 10 years after the case is closed for the purposes of our indemnity liability.

2.2. Counterparts and third parties

When we provide advice to our members, we also receive personal data about other persons than our members. Sometimes, after a specific assessment, we assess that we have a duty of confidentiality, that it is impossible or would require a disproportionate effort for us to notify everyone about our processing of personal data. In those cases, you can always read more about our processing of personal data here. If you have any questions, you can find our contact details further down in the policy.

We process your personal data based on article 6(1)(f) in the GDPR. Our legitimate interest is to be a professional organisation that manage the interests of our members. We disclose or transfer your personal data to among others the following categories of recipients: public authorities, courts, external advisors (for example lawyers), data processors and other necessary recipients.

Pharmadanmark is entitled to negotiate for pharmacists employed in pharmacies. In this regard, we receive a copy of contracts of employment from all pharmacists who are going to be employed in pharmacies, and thus, we process personal data. We process the personal data based on article 12(1) of the Danish Data Protection Act to comply with our labour law obligations and interests as laid down in collective agreements. We store the contracts of employment for 5 years after they have left our labour union or the labour market. For non-members, where the contract of employment is in line with the collective agreement, we store the contract of employment for up to 6 months. Contracts of employment for non-members which do not correspond to the collective agreement will be stored for up to 10 years to exercise potential legal claims.

2.3. Labour union representatives

2.3.1. Our own labour union representatives

In order for our labour union representatives to represent you as a member with us and provide you with labour union assistance, it is necessary for us to exchange personal data with them. Our exchange of personal data takes place to comply with the private and collective agreements to which we are subject in accordance with section 12(2) of the Danish Data Protection Act.

We store your personal data as described in 2.1 about your membership.

2.3.2. Co-registered labour union representatives

In order for our labour union representatives to represent members from other labour unions and for you as a member to receive labour union assistance from labour union representatives which are organised elsewhere than with us, it is necessary for us to exchange personal data with other labour unions. Our exchange of data is necessary to comply with the private and collective agreements to

which we are subject according to article 12(2) of the Danish Data Protection Act.

Each labour union is responsible for the processing carried out by the respective union in connection with the above-mentioned representation of non-members.

If you are a member with us, we will store your personal data as described in section 2.1 about your membership. If you are not a member with us, but one of the other labour unions, we will delete your personal data at the latest 10 years after we have concluded your case for the purposes of our indemnity liability.

2.4. Legal assistance

When we provide assistance in disputes related to employment law, we may disclose ordinary and sensitive personal data to external lawyers. We disclose among other things, name, e-mail address, labour union membership and information about the facts of the case. The purpose of the disclosure is to enable the lawyer to provide assistance in relation to your case.

We process the personal data based on article 6(1)(a) and article 9(2)(a) of the GDPR about consent. The consent is a part of the mandatory agreement.

We store the ordinary personal data for 10 years based on article 6(1)(f) of the GDPR about legitimate interest. Our legitimate interest is to document the history and course of events in case of a possible case about indemnity liability.

We store the sensitive personal data for 10 years based on article 9(2)(f) of the GDPR as the retention is necessary for the establishment, exercise, and defence of legal claims.

2.5. The member magazine Pharma

If you are a member or subscribe to our member magazine Pharma, we will distribute our member magazine to you. In order to send you the member magazine, we process ordinary data about you in the form of your name and e-mail address.

You can unsubscribe at any time by contacting us.

For the purpose of sending, you the member magazine, we will keep your personal data for as long as you wish to receive the member magazine from us and for 2 years thereafter. Please note, that if you are a member with us, we will keep your personal data for a longer period as described in section 2.1. about your membership.

If you are not a member with us, we process your personal data based on article 6(1)(a) of the GDPR about consent. You can withdraw your consent at any time. For more information, please refer to section 7 of this policy.

2.6. Events and networks

When you participate in our events and networks, we process your ordinary personal data that you have given us. This includes your name, title, place of work, address, telephone number, e-mail address and the type of event or network.

Our purpose of processing your personal data is to be able to carry out events and networks, to be

able to inform you regularly about practical matters relating to the organization of our events and networks and to be able to send you material, lists of participants, etc.

We store your personal data for as long as necessary to carry out our events and networks and evaluate them, after which we delete your personal data.

We process your personal data based on article 6(1)(b) of the GDPR as the processing is necessary for the performance of our agreement with you to participate in the event or network and article 9(2)(d) of the GDPR as the processing is carried out in the course of our legitimate activities as a labour union, including the organization of events and networks.

2.7. Newsletters

You receive our newsletter when you are a member of our labour union or when you have subscribed to our newsletters. In this context, we process ordinary personal data about you in the form of your name, email address, and place of work. The purpose of our processing of the personal data is to send our newsletter to you.

For the purpose of sending you our newsletters we will keep your personal data for as long as you wish receive newsletters and for 2 years thereafter. Please note that if you are a member with us, we will keep your personal data for a longer period as described in section 2.1. about your membership.

We process and store your personal data based on your consent in accordance with article 6(1)(a) in the GDPR or article 6(1)(f) of the GDPR about legitimate interest when newsletters contain only information about or from Pharmadanmarck and our purposes and interests. Our legitimate interest is to be a professional labour union that informs our members and stakeholders about relevant news in the industry.

You can withdraw your consent at any time by unsubscribing in the bottom of the newsletter or by contacting us via pd@pharmadanmarck.dk. Read more about this in section 7 of the policy.

2.8. The website

When you visit our website <https://www.pharmadanmarck.dk/>, we collect data about you to prepare statistics, optimise the website, use memory functions, and target marketing. Among other things we process the following:

- Your IP address, which is used for statistical purposes and remarketing,
- your operating system and browser version, which are used to optimise the future user experience on the website,
- date and time of the visit to the website, which is used for statistical purposes only,
- we place cookies on your device, including third party cookies. See more in our cookie policy: <https://pharmadanmarck.dk/da/cookiepolitik> and her <https://cookieinformation.com/cookie-and-privacy-policy>
- data is passed to third parties such as Google for statistical or targeting remarketing purposes.

We process your personal data based on article 6(1)(f) in the GDPR about legitimate interest. Our

legitimate interest is to offer you an interesting website that works optimally. In addition, we process your personal data based on article 6(1)(a) in the GDPR about consent.

2.9. Marketing and recruitment

Pharmadanmark is a labour union that represent the interests of its members. As a labour union, Pharmadanmark is not subject to the regulation in the Danish Marketing Act about spam and unsolicited telephone calls to consumers when these inquiries concern member canvassing, etc.

When we receive your information in connection with your contact with us either as a member, non-member or otherwise, we may process your information for the purpose of promoting our labour union's objects.

We may contact you by telephone, e-mail, social media, or other means where we can easily contact you directly by using the information we hold about you, and we may use your data to target campaigns and prepare tailored communication and offers to you either directly or through third party channels.

For the purpose for which we have received your information can be found in the other sections of this policy. At any time, you can decline that we contact you and we will then retain your information for the purpose of ensuring that we do not contact you again.

We process your personal data based on article 6(1)(f) in the GDPR, where the legitimate interest we are pursuing is to offer you a membership, increase your awareness of Pharmadanmark or otherwise make our interests known.

2.10. Job applicants and employees

Pharmadanmark is operated by the organisation Life Science Danmark ApS and therefore does not have any employees. If you choose to apply for a job at Pharmadanmark we will forward your application to the organisation Life Science Danmark ApS.

2.11. Rental of holiday homes

We handle applications for the rental of holiday homes that we either own ourselves or administer for others. When we receive applications we process ordinary personal data in the form of a name, address, telephone number, e-mail address and other information contained in the applications.

We process the personal data based on article 6(1)(f) of the GDPR about legitimate interest. Our legitimate interest is to rent out the holiday homes and to select a tenant for the period in question.

The personal data are kept for one year from the receipt of the application or for one year from the end of the rental period if the application is accepted, based on article 6(1)(f) of the GDPR about legitimate interest. Our legitimate interest is to process the applications and to follow up with the holiday home tenants if there is a need to do so.

2.12. Applications for the foundations we administer

When we receive applications for funding from the foundations we administer, we process ordinary personal data about the applicants, including their name, e-mail address, job position, telephone number, education, address, and signature. we also process special categories of personal data in

the form of the applicants' labour union membership. In addition, we process the personal identification number, bank and account details of the applicants who are awarded funds.

We process the ordinary personal data based on article 6(1)(f) of the GDPR about legitimate interest. Our legitimate interest is to provide the agreed assistance to the foundations, including assessing applications and administering the disbursement of funds.

We process and store special categories of personal data in the form of the applicants' labour union membership based on article 9(2)(a) of the GDPR about consent.

We process and store personal data based on article 11(2)(1) of the Danish Data Protection Act as we have a legal obligation to report the payments to SKAT and in accordance with the rules of the Danish Bookkeeping Act.

With regards to applications to the Klavs Steen Andersen's Foundation we also process special categories of personal data in the form of health information. We process and store the health information based on article 9(2)(a) of the GDPR about consent.

We store applications to the Foundations based on article 6(1)(f) of the GDPR about legitimate interest. Our legitimate interest is to know who has received funds in the past, to comply with waiting periods and to be able to disburse funds that are not due until a later date.

Personal data in accounting records are kept for 5 years based on article 6(1)(c) of the GDPR, as we have a legal obligation to report payments to SKAT and to keep accounting records in accordance with the Danish Bookkeeping Act.

Applications to the Klavs Steen Andersen's Foundation are stored until all funds for the application period in question have been disbursed. The names and application dates of applicants who are awarded funds by the Foundation are deleted after 5 years.

Applications to the Education and Development Foundation for which funds are awarded are kept for 3 years. The other applications are deleted once all funds for the applications period have been disbursed.

Applications to the Study Foundation are stored until all funds for the application period have been disbursed. The names and application dates of applicants who are awarded funding by the Foundation are kept for 2 years.

Applications to Uddannelsesfonden for Pharmadanmark – Regions and Municipalities are deleted when all funds for the application period have been disbursed.

2.13. The European Journal of Hospital Pharmacy magazine

When you are a member of Pharmadanmark's Regions and Municipalities section you receive the magazine The European Journal of Hospital Pharmacy from The European Association of Hospital Pharmacists. In order for you to receive the journal, we disclose your name, address and contact information to The European Association of Hospital Pharmacist, which then sends the journal to you in the future.

We process your personal data based on article 6(1)(b) of the GDPR, as our processing is necessary for us to fulfil our agreement with you regarding your membership with us.

You can contact us at any time at persondata@pharmadanmark.dk or correct your information on My page on Pharmadanmark.dk if you no longer wish to receive the magazine.

We will store the personal data until you either no longer wish to receive the magazine or you are no longer a member of our labour union.

3. How

In order to be able to offer you membership, our member magazine, newsletters, events, network, services, a good website, jobs, etc., it is necessary for us to process your personal data by collecting, registering, organising, systemising, storing, using, deleting, transferring, and passing on personal data.

4. Recipients or categories of recipients

We can disclose or hand over your personal data to employers, co-registered employee representatives, our data processors such as our secretariat Life Science Danmark ApS, external advisors (for example lawyers), other external suppliers or partners and public authorities, including SKAT and courts.

5. Transfer of personal data to third countries

In some cases, we transfer your personal data to recipients outside the EU/EEA. This happens when we use data processors in countries outside the EU/EEA. Such transfers will always take place in accordance with the GDPR, which means that the third countries that we transfer personal data to either have an adequate level of protection or that we use the European Commission's standard contractual clauses or other appropriate safeguards for our transfers.

You can contact persondata@pharmadanmark.dk for information on how to obtain a copy of the relevant transfer basis or where the relevant transfer basis is made available.

6. Security

Information we receive about people are stored securely and confidentially. Technically, we always make sure to use data processors that have the same level of security concerning your personal data as we have. Furthermore, internally in our organisation we focus on educating and teaching our employees about high data security. In the situations where it is appropriate, we make sure to encrypt, pseudonymise or anonymise your personal data. Additionally, we always ensure to follow the existing regulation regarding personal data.

We have taken appropriate technical and organisational measures to prevent your personal data from being accidentally or unlawfully deleted, published, lost, altered, or disclosed, misused, or otherwise processed in breach of the legislation in force at any time.

We use various encryption solutions to address the risk associated with our transmission of confidential and special categories of personal data via e-mails to members, other labour unions, etc.

We will delete your personal data when we no longer need to process them for one or more of the purposes mentioned above. There may be specific regulations such as the Danish Bookkeeping Act

and the Danish Limitation Act that give us the right and obligation to store the personal data for a longer period of time.

7. Right to withdraw your consent

You are at any time entitled to withdraw your consent to our processing of your personal data. You can withdraw your consent by sending an email to persondata@pharmadanmark.dk.

If you choose to withdraw your consent this will not affect the lawfulness of our processing of your personal data based on your previously provided consent and up to the point in time of your withdrawal. Therefore, if you withdraw your consent, it will take effect from that time.

Please remember that if you withdraw your consent to us sending you one of our newsletters, we will no longer be able to send you that newsletter.

8. Your rights

According to chapter III in the GDPR, you have several rights in relation to our processing of your personal data.

- The right to obtain access to the personal data that we process about you.
- The right to get inaccurate personal data that we process about you rectified.
- The right to have your personal data deleted and to get the processing of your personal data restricted.
- The right to object to our processing of your personal data.
- The right to receive your personal data in a structured, commonly used, and machine-readable format.

You can read more about your rights in the Danish Data Protection Agency's guide to data subjects' rights, which can be found on the Danish Data Protection Agency's website: www.datatilsynet.dk If you want to exercise your rights, you can send an e-mail to persondata@pharmadanmark.dk

9. Right to file a complaint

If you want to complain about our processing of your personal data, you may file a complaint to the Danish Data Protection Agency, which you can find at: Carl Jacobsens Vej 35, 2500 Valby, Denmark, via telephone number: +45 33193200 or via email: dt@datatilsynet.dk.

10. Do you have any questions?

If you have any questions about our privacy policy, you are welcome to contact us at any time via persondata@pharmadanmark.dk.