

# The Nordomatic Policy

# GDPR and Data

# Protection

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## About the Policy

This Privacy Policy for Employees ("**Privacy Policy**") provides information on how Nordomatic processes personal data concerning our employees under the General Data Protection Regulation (EU Regulation 2016/679) (after this, referred to as the "**GDPR**") and other applicable legislation.

This Policy also describes your data protection rights concerning our processing of your personal data. Personal data includes all information (e.g., name, address, salary, performance, and health information) that by itself or together with other information, can be used to identify a living person.

We control the personal data we collect concerning our employees and decide how to process your personal data according to applicable data protection laws and regulations.

## From where will we obtain your personal data?

Nordomatic will primarily obtain your personal data from you internally via our managers or human resources, e.g., during onboarding and throughout employment. Some personal data might be automatically generated from our IT systems or equivalent, for example, when creating your user ID in our systems.

## The categories of personal data that we process

We process standard personal data and specific special categories of personal data about you.

We process the following categories of **Employee Data** about you:

- ✚ Your name, job title, work address, job telephone numbers, user ID, email addresses, and similar data about you ("**Master Data**").
- ✚ Your home address, private email address, private telephone numbers, citizenship, work permit, and visa data, date of birth, gender, personal identity number, emergency contact details, CV data, bank account(s), information on prior employers, information on education and

skills, family members, and similar data about you ("**Further Identification Data**").

- ✚ Job position, work location (including remote work location if applicable), division, department, position level, employment contract (and amendments of such), working time and hours, leaves of absence (to the extent not due to sickness), vacation accrual and scheduling data, job description and assigned tasks and/or projects, manager's name and reporting line, business travel data, training data, information related to talent management, start and end date of employment, and reason for leaving and similar data about you ("**Job Data**").
- ✚ Your base salary, salary supplements, overtime compensation data, variable pay data (incl. bonus, commission), variable pay targets, occupational insurance benefits (including information about you and your dependents that we provide to the insurer), occupational pension benefits, accrued salary information, information relating to company credit cards, expenses, occupational wellness benefits, details on capital-forming benefits and similar data about you ("**Salary Data**").
- ✚ Units of stock or directorships held, details of all restricted stock units or any other entitlement to shares of stock awarded, canceled, exercised, vested, unvested, or outstanding in your favor, and similar data about you ("**Equity Compensation Data**").
- ✚ Computer usage information related to your use of company IT equipment, systems, and other resources, including IP addresses and similar data about you ("**Monitoring Data**").
- ✚ Email content, business letter content, business documents, chat content, and similar data about you ("**Communication Data**").
- ✚ Performance reviews, evaluations and ratings, performance improvement plans, information about disciplinary allegations, disciplinary processes and any warnings or reminders, and any outcome and similar data about you ("**Performance and Disciplinary Data**").

- ✚ Business photos and photos from corporate events ("Photos").

In addition, we process the following categories of **Sensitive Employee Data** about you:

- ✚ Information about sickness absence, incl. number of days, time period, and reason (if provided).
- ✚ Information on work-related accidents and incidents.
- ✚ Information on parental leave.

## Legal bases for the processing of personal data

Nordomatic may process your personal data on any of the following legal bases:

### **Contractual obligations:**

We need your personal data to perform crucial aspects of your employment contract, such as paying your salary and providing employment benefits.

### **Legitimate interest:**

Certain processing activities are necessary for Nordomatic's legitimate interest in operating our business, such as showing the employee on our website or in other situations connected with marketing or business relations, providing IT tools and services, access rights to Nordomatic premises, etc.

### **Legal obligation:**

To process your personal data, we must also comply with statutory requirements related to your employment. Such obligations could include book-keeping legislation, mandatory holidays, employee benefits rules, etc.

### **Consent:**

In exceptional cases, we may ask for your explicit consent to process certain personal data (entirely voluntary). You have the right to withdraw your consent at any time.

## Does Nordomatic use automated decision-making (including profiling)?

No, Nordomatic does not use automated decision-making (including profiling).

## Who do we share your personal data with?

To run a Nordomatic business, your personal data may be transferred to service providers, customers, business partners, external advisors, regulators, authorities, and other third parties. In many cases, you will disclose this personal data yourself, but there may be cases where a colleague of yours may do so.

Personal data may also be disclosed to a trade union under the law, e.g., in connection with business reorganizations, breach of employment agreements, and other measures taken in accordance with the law. Nordomatic may share your personal data with the following categories of recipients.

### **Data processors:**

As necessary for the processing purposes described above, personal data may be shared with our service providers so that they can process personal data on our behalf as data processors. A data processor is a company that processes personal data on our behalf and according to our instructions. The data processor may provide certain services to Nordomatic, administering the salaries and other compensation and benefits to our employees, for communication solutions (such as Microsoft Teams), and delivering other services such as IT-related tasks, IT systems, and networks solutions that enable us to focus on our core activities.

Nordomatic ensures third parties comply with GDPR standards.

### **External advisors:**

Nordomatic may transfer personal data to external advisors acting as separate data controllers (e.g., lawyers, accountants, auditors) based on our legitimate interest to liaise on various matters to obtain legal/auditing advice and in internal investigation matters.

### Customers, business partners, and other third parties:

We also communicate with third parties for business purposes, as necessary, in connection with our business operations. We may provide personal data about you, such as your name, work contact details, etc., to third parties (such as existing or potential business partners, suppliers, customers, end-customers, and government officials) as part of our business operations (e.g., document exchange and appointment setting).

### Regulator, authorities, and other third parties:

We transfer personal data to insurance companies, pension providers, and pension brokers to fulfil your employment contract.

### Acquiring entities:

Suppose the business you work for may be sold or transferred in whole or part (or such a sale or transfer is being contemplated). In that case, your personal data may be transferred to the new employer or potentially new employer as part of the transfer itself or as part of an initial review for such transfer (i.e., due diligence), subject to any rights provided by applicable law, including jurisdictions where the new employer or potentially new employer are located. Nordomatic has a legitimate interest in being able to perform these transactions.

## Retention of personal data

Personal data is retained only as long as necessary to fulfil the purposes outlined or as required by law.

## What rights do you have?

You have the right to:

- ✚ Access your data and request a copy
- ✚ Rectify any inaccuracies in your data
- ✚ Request data deletion under certain conditions
- ✚ Restrict or object to data processing
- ✚ Withdraw consent at any time

## Security Measures

We implement technical and organizational measures to protect your data against unauthorized access, alteration, or destruction.

## Review and Update

We may change this policy. If we make more prominent changes, you will be emailed to be informed.

This policy will regularly be reviewed.

## How to contact us

Please contact your direct manager with any questions regarding this policy.

## Key Messages

**This policy helps safeguard the personal and sensitive data of customers, employees, and stakeholders, reducing the risk of data misuse, identity theft, and fraud.**

We obtain personal and sensitive information through our daily operations.

We may share your personal information with authorities, service providers, and business partners.

We keep your personal information only as long as necessary to fulfil the purposes required by law.

You have the right to access your data at all times.

We implement technical and organizational measures to protect your data against unauthorized access, alteration, or destruction.

We process personal data concerning our employees under the General Data Protection Regulation (EU Regulation 2016/679) ("GDPR") and other applicable legislation.