

Processing of personal data - Customers

We care about your personal integrity, and it is important that you feel safe in our processing of your personal data. Here we tell you more about our personal data processing. The information is intended for you as a customer of Cowins International Forsikringsmæglerselskab A/S.

What is personal data?

Personal data is information that can be directly or indirectly linked to you as an individual. Examples of such information are name, social security number, address, telephone number, financial information such as insurance premiums, assessments under anti-money laundering laws and technical information such as IP addresses. If a piece of information is classified as sensitive, such as health data, special measures are required to ensure that the information is handled in a safe and correct manner.

Cowins International Forsikringsmæglerselskab A/S only collects and uses personal data that is necessary to fulfil the purposes for which it is collected. This information is needed for us to be able to deliver our services and comply with applicable legislation. You have the right to object to certain processing of your data, for example for marketing purposes. More information about your rights and how you can exercise them can be found under the section "***Your rights in relation to your personal data***".

Your rights in relation to your personal data

According to the GDPR, you have several rights, for example, you have the right to know if and what personal data we process about you. Below you can read about your rights and if you want to read more about each right, we refer you to <https://www.datatilsynet.dk/borger/hvad-er-dine-rettigheder>. Do you want to get in touch with us to exercise any of your rights? Then you are welcome and do it easiest by sending an email to kho@cowins.dk

In some cases, you have the right to have your personal data deleted. This applies, for example, to information that we do not need to comply with a legal obligation or to fulfil our obligations under the applicable agreement.

Right to access your personal data

You have the right to find out whether Cowins International Forsikringsmæglerselskab A/S processes your personal data and to receive a copy of your personal data. Through a so-called register extract, you get to know what information we have about you and how we process your personal data.

You have the right to receive confirmation as to whether we process personal data about you and, if so, information about our processing. You also have the right to receive a register extract showing the personal data. Additional register extracts may be associated with a reasonable cost to you.

Right to data portability

You have the right to request that personal data that you have provided to Cowins International Forsikringsmæglerselskab A/S in a structured, commonly used and machine-readable format be transferred to another data controller, so-called data portability. The right to data portability requires that we process the relevant personal data on the basis of consent (Article 6(1)(a)) or the performance of a contract (Article 6(1)(b)).

Right to rectification

This right means that you can request that we correct incorrect or incomplete information about you, and that we complete your information.

Right to restriction

If you believe that the data we hold about you is not accurate, that we do not need the data for a specific purpose or that the processing is contrary to law, you have the right to request that Cowins International Forsikringsmæglerselskab A/S restricts our processing of your personal data. You can also request that we do not process your data while we are checking this, or while we are checking whether you have the right to object to certain processing as described below.

Right to object to the processing of your personal data

You have the right to object to our processing that takes place based on the lawful basis of legitimate interest. Which is normally done when we contact you for marketing purposes, when you tell us that you no longer wish to receive direct marketing from us, we will turn off marketing and stop sending you marketing.

How do I contact Cowins International Forsikringsmæglerselskab A/S?

If you have questions about how Cowins International Forsikringsmæglerselskab A/S handles your personal data, wish to make a complaint about our processing of it or wish to exercise your rights, you can

turn to the person you already have an established contact with or to Cowins International Forsikringsmæglerelskab A/S at kho@cowins.dk

If you wish to file a complaint about how we process your personal data to the Danish Authority for Privacy Protection, you can do so by contacting the authority in one of the following channels:

Danish Authority for Privacy Protection | Datatilsynet

dt@datatilsynet.dk

33 19 32 00

The Danish Authority for Privacy Protection Carl Jacobsens Vej 35, 2500 Valby

If you live in a country other than Denmark, you can also contact the supervisory authority in that country.

What we do with your personal data

Cowins International Forsikringsmæglerelskab A/S processes personal data relating to its customers for one or more of the following purposes, depending on the type of customer relationship. The overall purpose is to provide securities services and related activities.

To make it easy for you to find the sections that interest you, we have divided the content into a number of headings. Click on each heading to get more information.

Placement of insurance

Who is the data controller?

We are the data controller for the processing of personal data within the framework of the opening of a custody account in accordance with the EU General Data Protection Regulation ("GDPR"). If you have any questions regarding the processing of your personal data, you can contact kho@cowins.dk

How do we process your personal data?

We analyse assets and risks, assess insurance requirements, and use data to negotiate with insurers and place appropriate insurance coverage

Other purposes

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Marketing

Personal data will not be processed for the purpose of marketing.

Troubleshooting and development

Your personal data may be used for troubleshooting in specific cases and for further development of the company's proprietary systems.

Maintain contact with our customers

Cowins International Forsikringsmæglerselskab A/S main customers are companies, and we process the personal data of our contact persons for the various customer companies and their various services. The personal data that is processed is usually name, e-mail address, title/role, telephone number.

What is the legal basis for Cowins International Forsikringsmæglerselskab A/S for the processing of personal data?

Our processing of your personal data is based on a combination of the performance of a contract (Article 6(1)(b) of the GDPR), the fulfilment of a legal obligation (Article 6(1)(c)) and legitimate interests (Article 6(1)(f)).

Legitimate interest

When we use the legal basis of legitimate interest, we always carry out a so-called balancing of interests. This means that Cowins International Forsikringsmæglerselskab A/S has assessed that Cowins International Forsikringsmæglerselskab A/S interest in processing your personal data in this way outweighs yours.

Cowins International Forsikringsmæglerselskab A/S legitimate interests:

- providing insurance brokerage and advisory services
- managing customer relationships and ongoing communication
- risk assessment and insurance placement
- documentation, quality assurance, and internal administration
- preventing fraud and ensuring IT and information security

Performance of contracts

When Cowins International Forsikringsmæglerselskab A/S has an agreement with you or your employer, we need to process personal data in order to fulfil our part of the agreement, for example in connection with insurance advice, placement of insurance coverage, administration of policies, and ongoing servicing.

Compliance with legal obligation

Cowins International Forsikringsmæglerselskab A/S is subject to several other laws such as the including Danish insurance brokerage legislation, the Insurance Distribution Directive (IDD), accounting legislation, and anti-money laundering regulations, where the processing of personal data is necessary to be able to comply with these laws.

When does Cowins International Forsikringsmæglerselskab A/S share personal data with others?

You can be sure that Cowins International Forsikringsmæglerselskab A/S never sells your personal data to other companies. However, your data may be shared within the Max Matthiessen Group when there is a legitimate interest in doing so, or if another company within the Group performs administrative tasks for the company with which you have a relationship.

Depending on the service we offer, your personal data may be shared with other recipients, such as the insurer you have chosen, your employer or the company where your custody account is registered. In order to comply with our legal obligations, we may also share data with authorities.

We collaborate with external suppliers for services such as IT, communication, contract management, and storage. Therefore, your personal data may be shared with these suppliers and partners, who act as data processors for Cowins International Forsikringsmæglerselskab A/S. We place the same high demands on confidentiality and security at our suppliers as we do in our own handling of personal data.

In the event of legal proceedings or disputes, we may need to share your personal data with, for example, courts, tribunals or lawyers in order to comply with legal requirements or in order to be able to defend or assert its legal claims.

The processing of your personal data takes place within Denmark or within the EU/EEA. However, it may happen that suppliers or their subcontractors are located outside Denmark and the EU/EEA. When cooperates with such suppliers, we ensure that the necessary measures are taken to ensure that the transfer meets the GDPR's requirements for the level of protection in the case of third-country transfers. This may mean that the supplier is based in a country with an adequate level of protection or that standard contractual clauses are used in conjunction with supplementary safeguards.

How long do we keep your personal data?

The basic principle is that we will only retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected. This means that we store your personal data for as long as you have a contractual or customer relationship with Cowins International Forsikringsmæglerselskab A/S or there is an active power of attorney from you, or until we no longer have a legitimate interest in keeping it. If the processing is based on your consent, the storage will cease when you withdraw your consent.

Due to our business, we have to comply with extensive legal requirements, which may mean that we need to retain certain personal data for longer than your active relationship with us, including under bookkeeping legislation, insurance legislation, and anti-money laundering legislation.

Automated decision-making and profiling?

Within the framework of our marketing, we may process personal data about you through profiling in order to be able to provide you with targeted messages and offers that are relevant to you. You have the right to object to this processing of personal data at any time. The information we process through profiling will not be used to make fully automated decisions.