



Privacy Notice

Privacy Notice for Falck Danmark A/S, Covid-19 antigen test

In connection with your Covid-19 test, Falck Denmark A/S collects and processes – as data controller – certain personal data about you.

In this Privacy Notice, we describe our processing, use and transfer of personal data.

A. Purpose

We collect and process personal data for the following purposes:

1. To perform a Covid-19 test including providing you with the test result as well as information on how to act in case of a positive result.
2. To prepare a medical record in accordance with our journaling obligation under Danish law.
3. To pass on information to the Danish Medical Sector Research Institute ('Statens Serum Institut' ('SSI')), for the purpose of securing satisfactory data for contamination tracking and investigation, which will be used to assess the national level of contamination, and for SSI to make your test answer available to yourself and relevant healthcare professionals on Sundhed.dk.
4. In relation to individuals without a Danish CPR-number; to pass on information to the Danish Department of Patient Safety ('Styrelsen for Patientsikkerhed') in case you are tested positive, to allow them to investigate possible contaminations in your close relations to prevent further spreading of the Covid-19 virus.
5. In relation to tests facilitated by Employer or school management: To inform your Employer/school management in case your test result is positive, so that they will be able to initiate necessary actions to prevent further spreading of the Covid-19 virus.
6. To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (e.g., EU Data Protection Regulation or The Danish Executive Order of Journalkeeping (Journalføringsbekendtgørelsen), e.g:
 - a. Documentation requirements
 - b. Compliance with basic principles for processing of personal data and legal basis for processing.
 - c. Implementation and maintenance of technical and organizational security measures, including but not limited to prevent unauthorized access to systems and information, prevent receipt or distribution of malicious code, termination of denial-of-service-attacks and damage to computer systems and electronical communication systems.
 - d. Investigation of a suspected or known security breaches and reporting of such breach to individuals and authorities
 - e. To process and respond to requests and complaints from data subjects and others
 - f. Handling of inspections and requests from authorities
 - g. Management of disputes with data subjects and third parties.
 - h. Anonymization of data to create statistic and scientific research

Your personal information will not be shared, sold or disclosed other than as described in this Privacy Notice.

When we collect personal information directly from you, it is necessary for us to perform a Covid-19 test on you and provide you with the test result and relevant information in connection hereto. You are not obligated to provide the

personal information to us. If you do not provide us with the personal information necessary as described above, the consequence will be that we cannot perform a Covid-19 test on you.

B. Processed personal data

We collect and process the following types of personal information about you:

General categories of personal data

- Contact information (name, e-mail and phone number)
- Covid-19 contamination status if negative or inconclusive.

Special categories of personal data

- Health information, Covid-19 contamination status (if positive).
- Social Security Number
- Genetic data

C. The Legal Basis for Processing and retention period of the Personal Information

The legal basis for processing of your data in relation to the Covid-19 test is the following:

| <i>Process/Purpose</i> | <i>Deletion and retention criteria</i> | <i>Legal basis</i> |
|--|---|--|
| Personal data necessary to perform the test and provide test result as well as follow-up information | No more than 1 month after sending information to the Danish Department of Patient Safety. | GDPR article 6(1)(f) – Legitimate interest in performing the Covid-19 test. |
| Genetic data collected by inoculation to determine infection with Covid-19. | No more than 14 days after the test has been performed. | GDPR article 6(1)(f) – Legitimate interest in performing the Covid-19 test. GDPR article 9(2)(h) – medical diagnosis and treatment. Consent to treatment as described in the Danish Health Act ('Sundhedsloven'), §15(1). |
| Data registered in the medical record I (test result, CPR-number etc.) | 10 years from the last input in your medical record. | GDPR article 6(1)(c) – legal obligation - and 9(2)(h) – medical diagnosis and treatment. The Danish Executive Order of Journalkeeping ('Journalføringsbekendtgørelsen'), §15(1). Consent to treatment as described in the Danish Health Act ('Sundhedsloven'), §15(1). |
| Transferring information to the Danish Medical Sector Institute for Research (SSI) for the purpose of tracking the national contamination level and perform contamination investigation as | No more than 1 month after transferring the information to the Danish medical sector institute for research (SSI) | GDPR article 6(1)(c) – legal obligation - and 9(2)(i) – public interest in the field of public health Executive Order on Notification of Covid-19 § 1(1) |

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|---|--|--|
| well as for SSI to make your test result available on sundhed.dk | | The Danish Health Act ('Sundhedsloven'), §43(2)(1). |
| Storage of data for documentations purposes to prove correct handling of process and legal requirements in relation to the Danish Statute of Limitations. | 3 years. See further requirements in this matrix for documentations purposes. | GDPR article 6(1)(f) – legitimate interest ins documenting correct handling of process' and legal requirements. The Danish Statute of Limitations §3(1). |
| Providing negative test results by text message if it's agreed that you leave the test center prior to the result. | No more than 1 month after sending the text message to you. | GDPR article 6(1)(f) – Legitimate interest in providing you with the test result. |
| Additional purpose if you don't have a Danish CPR-number | | |
| Transferring information to the Danish Department of Patient Safety ('Styrelsen for Patientsikkerhed') for the purpose of tracking possible contamination chains. | No more than 1 month after transferring the information to the Danish Department of Patient Safety. | GDPR article 6(1)(c) – legal obligation - and 9(2)(i) – public interest in the field of public health Executive Order on Private Test Providers' Notification of Positive Results of Tests for Covid-19 for the purpose of infection detection and compensation § 1(1) The Danish Health Act ('Sundhedsloven'), §43(2)(1). |
| Additional purpose, if data needs to be transferred to your Employer or school management | | |
| Transfer of your test result to your Employer/school management in case of a positive result, for them to be able to initiate necessary actions to prevent further spreading of Covid-19 virus. | 3 years from consent is collected cf. documentation purposes in case there is uncertainty whether the consent is given or not. | GDPR article 6(1)(f) – Legitimate interest in disclosing the test result to prevent further spreading of Covid-19 virus. GDPR article 9(2)(i) – Public interest in the field of public health. The Danish Health Act ('Sundhedsloven'), §43(2)(2). |

For processing's related to the testing based on our legitimate interest, we are basing this on:

- 1) our interest in processing information of you, as we otherwise would not be able to provide you the possibility of a test;
- 2) our interest in storing personal data to document correct handling of legal requirements;
- 3) our interest in providing you with your test result by SMS, and;
- 4) If your test result is disclosed to your Employer/school management: our interest in disclosing the result for them to initiate necessary actions to prevent further spreading of Covid-19.

The processing of the data is thereby not only in our interest, but also in yours

For processing's based on your consent you have a right to withdraw such consent, however this will not affect the processing already incurred prior to withdrawal of the consent. You can withdraw your consent by contacting us on kvalitet@falck.dk

D. Automated, individual decision making

Personal data is not used for automated, individual decision making or profiling.

E. Disclosure of Personal Information

Your personal information will be disclosed to and shared with the following recipients:

| Name | Registration number | Address | Country | Purpose |
|---|-------------------------------------|---------------------------------------|----------------------------------|---|
| Statens Serum Institut (the Danish Medical Sector Institute for Research (SSI)) | 46837428 | Artillerivej 5 2300 København S | Denmark | To secure satisfactory data for contamination tracking and investigation as well as pandemic research |
| The Danish CPR-register – The Danish Ministry of Social and Domestic Affairs (Social og Indenrigsministeriet) | 33962452 | Holmens Kanal 22 1060 København K | Denmark | |
| Additional recipients, if you do not have a Danish CPR-number | | | | |
| Styrelsen for Patientsikkerhed | 37105562 | Islands Brygge 67 2300 København S | Denmark | To conduct contamination-chain investigation. |
| Additional recipients, if you have given consent for transfer of information to your employer | | | | |
| Your Employer/school management | Your Employer's/school's CVR-number | Your Employer's/school's address | Your Employer's/school's country | To inform your Employer/school management of your test and its result |

Beside the above-mentioned recipients, your personal information will be transferred to our data processors and/or sub-processors, being:

| Name | Category | Location | Sector | Purpose/description |
|--------------------------|--------------------|----------|------------|---|
| Responce A/S | Data Processor | DK | Medical | Performing of tests (daughter company to Falck Danmark A/S) |
| Marius Pedersen A/S | Data Processor | DK | Renovation | Secure disposal of genetic material |
| Microsoft Tenant | Data Processor | EU | IT | O365 Cloud Services to transfer information to the Danish Department of Patient Safety (Styrelsen for Personssikkerhed) |
| Microsoft Cloud Services | Data Sub-processor | Global | IT | Microsoft cloud set-up* |
| HCL Denmark | Data Processor | EU | IT | Operational Support |
| HCL Sweden | Data Processor | EU | IT | Data Centers |
| HCL Poland | Data Sub-Processor | EU | IT | Database Management |
| HCL India | Data Sub-Processor | India | IT | Operational Support |

| | | | | |
|--------------------------------------|--------------------|-----|----|--|
| KMD A/S | Data Processor | DK | IT | IT system supplier for journaling and data sharing with SSI |
| Onlinecity.IO ApS | Data Sub-Processor | DK | IT | SMS provider for providing of text messages in relation to negative test results if agreed with you |
| Link Mobility | Data Processor | DK | IT | Back-up solution - SMS provider for providing of SMS notification when your test result is available in case access through standard solution fails. |
| IP Only | Data Sub-Processor | SE | IT | Support of back-up SMS solution |
| Interexion | Data Sub-Processor | GE | IT | Support of back-up SMS solution |
| Lumen | Data Sub-Processor | ES | IT | Support of back-up SMS solution |
| eShelther | Data Sub-Processor | GE | IT | Support of back-up SMS solution |
| Microsoft Ireland Operations Limited | Data Sub-Processor | EU | IT | Data Center |
| Microsoft Corporation | Data Sub-Processor | USA | IT | Operational Support |

*Further information on Microsoft's Data Processors can be found at:

<https://servicetrust.microsoft.com/Library?command=Download&downloadType=Document&downloadId=926b2cf5-6b6e-43ca-9bc3-f73e961aad5f>

Further information on legal basis for transferring of data outside EU/EEA can be found at:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_de

F. Your rights

Within the limitations of the law, you have the right to:

- right to access to personal data;
 - You have the right to, free of charge, receive all information which is processed of you in an easily readable and understandable way.
- right to rectify incorrect information;
 - You have the right to correct any processed data which is incorrect.
- right to deletion of information;
 - You have the right to request deletion of data processed about you, should we not have a legal basis for continual processing of your data.
- right to restrict the processing of information;
 - You have the right to restrict the access to the data, resulting in the data cannot be processed for any purpose besides storage, unless we can justify continued processing.
- right to data portability, and;

- You have the right to receive the information processed by you in a structured, commonly used and machine-readable format.
- right to object to the processing of personal data, including automated, individual decisions.
 - You have the right to object to a data processing, either entire processing or parts of the processing, where after we cannot continue process the data, unless we can demonstrate a legal basis for the processing, which overrides the objection. This includes objection against any processing including automated and individual decision-making, should this occur.

You can exercise your rights by contacting Falck on the named contact information in section G “Contact details”

You also have a right to lodge a complaint with the supervisory authority in Denmark, ‘Datatilsynet’.

G. Contact details

If you have any questions or comments with respect to the processing of your personal data or you wish to exercise your rights under applicable legislation, please contact us on kvalitet@falck.dk or our data protection officer by emailing to dpo@falck.com.

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| Date of change | Version | Changes |
|-----------------------|----------------|--|
| 2021-01-29 | V1 | Initial Privacy Notice ready for use |
| 2021-03-05 | V2 | <ul style="list-style-type: none"> • Change of sub-processor for sending of text message with a link to a negative result. • Process added for transfer of data to your employer based on your consent. • Added legal basis for storing data for documentations purposes. • Changed transfer to the Danish Department of Patient Safety (‘Styrelsen for Patientsikkerhed’) to only be related to individuals without a Danish CPR-number, due to new requirements. |
| 2021-03-18 | V3 | <ul style="list-style-type: none"> • Removal of sections related to collection of consent on behalf of SSI for them to make test results available on sundhed.dk |
| 2021-03-23 | V4 | <ul style="list-style-type: none"> • Change of legal basis for disclosing test result to Employer/school management. |
| 2021-05-28 | V5 | <ul style="list-style-type: none"> • Added back-up SMS solution including relevant data processors. |