



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 department of patient safety ('Styrelsen for Patientsikkerhed'), to allow them to investigate possible contaminations in your close relations. This is done to prevent further spreading of the Covid-19 virus.
4. 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 (eg. 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)

Special categories of personal data

- Health information, Covid-19 contamination status (negative or 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)(b) – contractual necessity.
Genetic data collected by inoculation to determine infection with Covid-19.	No more than 14 days after the test has been performed.	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 patient journal (test result, CPR-number etc.)	10 years from the last input in your medical journal.	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 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 The Danish Data Protection Act ('Databeskyttelsesloven') §11(2)(4) – processing of Danish Social Security Number. The Danish Data Protection Act ('Databeskyttelsesloven') §7(3). The Danish Health Act ('Sundhedsloven'), §43(2)(2).
Providing negative test results by text message if it's agreed that	No more than 1 month after sending the text message to you.	GDPR article 6(1)(b) – contractual necessity.

you leave the test center prior to the result		
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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
Styrelsen for Patientsikkerhed	37105562	Islands Brygge 67 2300 København S	Denmark	To conduct contamination-chain investigation.

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 Personsikkerhed)
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
IP-Only	Data Processor	EU	IT	SMS provider for providing of text messages in relation to negative test results

*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
2020-10-15	V3	Initial Privacy Notice ready for use
2020-11-12	V4	<ul style="list-style-type: none">• Added purpose: Sending of text messages for negative results.

		<ul style="list-style-type: none"> • Changes to processors and sub-processors for the use of new booking application and sending of text messages. • Minor changes in wording and spelling errors.
2020-11-20	V5	<ul style="list-style-type: none"> • Legal basis for transfer is changed in C
2020-12-12	V6	<ul style="list-style-type: none"> • Legal basis for billing information is changed in C and related processors in E is removed.
2020-15-12	V7	<ul style="list-style-type: none"> • Change to processors for secure disposal of genetic material.