

Privacy Policy for Falck Danmark A/S patient transportation at Copenhagen Airport performed by Falck

In connection with patient transportation at Copenhagen Airport, Falck Danmark A/S collects and processes, as data controller, certain personal data about you.

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

A. Information and Purpose

We collect and process personal data for the following purposes:

1. To be able to drive you from a location to Copenhagen Airport or to drive you from Copenhagen Airport to your destination.
2. 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 ("GDPR")), 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 organisational security measures, including but not limited to prevent unauthorised 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.

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

Insofar we collect personal information directly from you it is necessary in order for us to provide you with the patient transportation. You are not obligated to provide the personal information to us. If you do not provide us with the personal information described below, the consequence will be that we may not be able to provide you with the transportation to or from Copenhagen Airport in relation to the patient transportation service or that the quality of the service will be diminished due to insufficient information.

B. Processed personal data

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

General categories of personal data

Normal personal data	Received from
Name	<ul style="list-style-type: none"> • Yourself • Requester*
Phone number	<ul style="list-style-type: none"> • Yourself • Requester*
E-mail	<ul style="list-style-type: none"> • Yourself • Requester*
Collection and destination address	<ul style="list-style-type: none"> • Yourself • Requester*

Confidential personal data	Received from
Social Security Number (In Denmark: 'CPR-nummer')	<ul style="list-style-type: none"> • Yourself • Requester*

Sensitive personal data	Received from
Health information <ul style="list-style-type: none"> • Information relevant for the transportation, such as you being blind, can sit or need to be laying down etc. Additionally, the collection and destination address may be considered as health information, depending on the specific circumstances (i.e. the place of treatment). 	<ul style="list-style-type: none"> • Yourself • Requester*

* The "Requester" can be your employer, region or similar, who has requested Falck to provide you with the patient transportation. See additional information in section E.

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

The legal basis for processing the personal data is the following:

<i>Purpose description</i>	<i>Retention time and criteria</i>	<i>Legal basis</i>
Legal documentation, such as documentation of handling a request from you, storing data based on an ongoing or coming case at court, investigation of suspected or identified data breach etc.	Data in relation to legal documentation will only be stored in cases where it's relevant and only for the time for which it's required	Legal requirement (GDPR art. 6 (1)(c)) for the processing of your ordinary personal data. More requirements depending on each case.
Informing the recipients of your data of any changes to and deletion or restriction of your data based on your request of your rights as described the GDPR art. 16, 17(1) and 18.	Documentation of information sent to recipients will be stored for 3 years	Legal requirement (GDPR art. 6 (1)(c)) for the processing of your ordinary personal data. Obligation to notify recipients (GDPR art. 19).

		<p>The Danish statute of limitation §3.</p> <p>More requirements depending on each case.</p>
<p>Processing of your personal data to be able to offer you sitting and laying patient transportation.</p>	<p>1 year plus the current</p>	<p>Legitimate interest (GDPR art. 6(1)(f)) for processing of your ordinary personal data.</p> <p>Legal claims (GDPR art. 9(2)(f)) for processing of your special categories of personal data and social security number.</p>
<p>Transfer of your personal data to a taxi company to ensure your transportation, insofar Falck cannot perform the transportation by ourselves.</p>	<p>1 year plus the current</p>	<p>Legitimate interest (GDPR art. 6(1)(f)) for processing of your ordinary personal data.</p>
<p>Storage of your data to be able to document correct provision of the service to you.</p>	<p>1 year plus the current</p>	<p>Legal requirement (GDPR art. 6 (1)(c)) for the processing of your ordinary personal data.</p> <p>Storage of your social security number will be done based on the Danish data protection act §§ 11(4) and 7(1) as well as the GDPR art. 9(2)(f).</p> <p>Legal claims (GDPR art. 9(2)(f)) for processing of your special categories of personal data.</p>
<p>Health related treatment, insofar this is relevant during your transportation. This can, as an example, be providing you with oxygen during the transportation. Additionally keeping a medical record of the treatment.</p>	<p>10 years from the provision of the health-related treatment.</p>	<p>Legal requirement (GDPR art. 6 (1)(c)) for the processing of your ordinary personal data.</p> <p>Medical diagnosis and treatment (GDPR art. 9(2)(h)).</p> <p>The Danish Health Act.</p> <p>The Danish executive order of journal keeping §5(1).</p>
<p>Invoicing information to be able invoice you or your</p>	<p>5 years from the end of the bookkeeping year.</p>	<p>Legal requirement (GDPR art. 6 (1)(c)) for the processing</p>

requester and comply with the Danish bookkeeping act.		<p>of your ordinary personal data.</p> <p>Legal claims (GDPR art. 9(2)(f)) for processing of your special categories of personal data.</p> <p>The Danish bookkeeping act §10.</p>
Transfer of data to the place of treatment, to inform them of your arrival as well as giving them the required information for them to be able to provide you with their service.	1 year plus the current	<p>Legitimate interest (GDPR art. 6 (1)(f)) for the processing of your ordinary personal data.</p> <p>The Danish data protection act §11(3) to transfer your CPR-number to the place of treatment to ensure correct identification of you.</p>
Transfer of information related to the transportation to invoice to the requester ('driving statement').	5 years from the end of the bookkeeping year.	<p>Legitimate interest (GDPR art. 6 (1)(f)) for the processing of your ordinary personal data.</p> <p>Legal claims (GDPR art. 9(2)(f)) for processing of your special categories of personal data.</p> <p>The Danish bookkeeping act §10, as the driving statement is part of the basis of the invoicing.</p>

The justification for our processing based on legitimate interest is (amongst other) based on the below:

- 1) We will need to collect personal information from your requester, to be able to offer you transportation (both sitting and laying). This information is necessary to be able to provide you with the patient transportation.
- 2) We may transfer your information to a taxi company to ensure you will receive your transportation, insofar we are not able to provide this transportation ourselves.
- 3) We will transfer information about you to the place of treatment to make sure they are aware of your arrival as well as making it possible for them to ensure correct identification of you.
- 4) We will need to invoice the requester, to be able to provide you with the patient transportation. This will include sending some information about you and your transportation to the requester within the invoicing.

The processing is on this basis not only in our interest, but also in yours.

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 third party recipients (third party meaning independent data controller):

Category of recipients	CVR-number	Address	Country	Purpose
Requester	Depending on your Requester, who you receive Falck's transportation through (i.e. employer, region etc.).	Depending on your Requester	Depending on your Requester	Falck transfers your information to the Requester, to be able to inform and document the completion of the transportation.
The place of treatment	Depending on where you will receive or have received treatment	Depending on where you will receive or have received treatment	Denmark	Falck transfers your information to the place of treatment where you are transported to or from (if relevant), thereby allowing the place of treatment to receive necessary information to more easily and faster provide you with the treatment. Most of these places of treatment will be hospitals in Danish Capital Region ('Region Hovedstaden').
External driving provider, i.e. taxi company	Depending on the specific taxi company.	Depending on the specific taxi company.	Denmark	Falck can transfer relevant information to an external driving provider, i.e. taxi company, in cases where Falck cannot provide you the transportation ourselves.

Beside the above-mentioned recipients, then your personal information will also be sent to the following suppliers ("Data Processors"):

Name	Category	Location	Sector	Purpose
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HCL Denmark	Sub-processor	Denmark	IT	Hosting of servers and network infrastructure and giving support
Falck Medycyna	Sub-processor	Poland	IT	Systemdevelopment and support as well as servicedesk handling
HCL Poland	Sub-processor	Poland	IT	Database support
HCL Gothenburg	Sub-processor	Sweden	IT	Serverhosting
HCL Gothenburg	Sub-processor	Sweden	IT	Serverhosting
HCL Noida	Sub-processor	India (a)	IT	Handling of Sharepoint and Office365
HCL Lucknow	Sub-processor	India (a)	IT	Handling of Sharepoint and Office365
Microsoft Inc.	Sub-processor	EU	IT	Serverhosting
Microsoft Inc. suppliers	Sub-processor	Global (a)	IT	Microsoft suppliers (see reference *)
Wipro	Sub-processor	India (a)	Finance	Bookkeeping and invoicing support

Additional information on Microsoft's data processors can be found on:

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

More information on the legal basis used to transfer your data to the third country/countries (see the reference next to the country in the above matrixes)

- a) EU Standard Contractual Clauses: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_de

F. Your rights

You have – with the limitations of legislation – among other things:

- right to access in 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;
 - We will, upon your request, delete all or specific data we process 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" or on kvalitet@falck.dk.

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 kvalitet@falck.dk or our data protection officer by emailing to dpo@falck.com.

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<u>Date</u>	<u>Version</u>	<u>Changes</u>
14.03.2022	1.0	First version of the Privacy Policy implemented