

# Personal Data Policy for HITSA A/S

## 1. GENERAL

### 1.1

This policy regarding processing of personal data (“Personal Data Policy”) describes how HITSA A/S collects and processes data about you.

### 1.2

The Personal Data Policy applies to personal data that you provide to us in connection with your contact with HITSA as a customer or partner. This could be, for example, if you purchase an item from HITSA A/S, get in touch with HITSA A/S for any reason, or when you use the Lampas website, <https://hitsa.dk/>.

### 1.3

HITSA A/S is the data controller for your personal data. You can withdraw your consent at any time. You can withdraw consent by sending an e-mail notifying us of this (see point 5.7.1).

## 2. WHAT PERSONAL DATA WE COLLECT, FOR WHAT PURPOSE AND THE LEGAL BASIS FOR PROCESSING

### 2.1

When you visit HITSA.dk, we automatically collect data about you and your use of HITSA.dk. This data will typically include what type of browser you are using, what search terms you use on HITSA.dk, your IP address, including your network location, and information about your computer. The [HITSA Cookie Policy](#) is also applicable when you use HITSA.dk.

#### 2.1.1

The purpose is to optimise the user experience and the functionality of HITSA.dk, to generate useful and accurate statistics, and, based on the information we obtain from you through your use of HITSA.dk, to conduct personalised marketing, including retargeting via social media and Google. This processing of data is necessary to enable us to pursue our interests in improving HITSA.dk and showing you relevant products.

#### 2.1.2

The legal basis for processing is your consent to our use of cookies and Article 6, paragraph 1, point (a) of the General Data Protection Regulation, and our legitimate interest in improving our website and being as relevant in our marketing as possible (see the General Data Protection Regulation, Article 6, paragraph 1, point (f)).

### 2.2

When you purchase a product or communicate with us regarding our products, we collect the data you yourself provide. This could be name, address, e-mail address, telephone number, payment method, information on which products you purchase, queries and complaints and delivery requests.

#### 2.2.1

The purpose of this is to enable us to deliver the products you have ordered and otherwise fulfil our agreement with you, as well as to be able to contact you, if necessary, with relevant information about the product you have purchased. We may also process information about your purchases in order to comply with legal requirements, including concerning the recall of products, accounting and financial records.

#### 2.2.2

The legal basis for processing is Article 6, paragraph 1, points (b), (c) and (f) of the General Data Protection Regulation.

### 2.3

When you subscribe to our newsletter, we collect data including your name, e-mail address and possibly also a mobile number.

#### 2.3.1

The purpose of this is to pursue our interest in being able to deliver our newsletter to you.

#### 2.3.2

The legal basis for processing is your consent to receive our newsletter and Article 6, paragraph 1, point (a) of the General Data Protection Regulation.

### 2.4

When you visit HITSAS social media sites, e.g. Facebook, Instagram and LinkedIn, HITSA processes the data you have made available via settings on our social media channels, your reactions to our posts, and your sharing of these, as well as any comments relating to our posts.

### 2.5

If you enter into a commercial relationship with us, either as a private individual or as an employee of a business we collaborate with, we process data such as your name, e-mail address, telephone number, company or private address and any other data you provide in connection with our relationship and your communication with us.

#### 2.5.1

The purpose of processing by HITSA is to pursue our collaborative relationship and be able to fulfil HITSAS obligations in connection with this.

### 2.5.2

The legal basis for this processing will normally be the agreement entered into between you and/or the business you represent and HITSA (see Article 6, paragraph 1, point (b) of the General Data Protection Regulation). Depending on the nature of the collaboration, the legal basis may also be another typical HITSA legitimate interest, namely in establishing and pursuing the relationship between you and/or the business you represent (see Article 6, paragraph 1, point (f) of the General Data Protection Regulation).

## 3. STORAGE OF YOUR PERSONAL DATA

### 3.1

Your e-mail containing your personal data is erased once your communication with us has been concluded and finalised, unless it is stored in your customer file (see section 5), and is erased 5 years after the customer relationship ceases.

## 4. RECIPIENTS OF PERSONAL DATA

### 4.1

HITSA cannot access your IP address, but it is made available to our partner Google Analytics, which processes it in order to generate statistics concerning use of our website. Google Analytics only acts on behalf of HITSA, and so may not use the data for their own purposes. HITSA also has the option of implementing Facebook Pixels on HITSA.dk to gather data for the purpose of optimising our Facebook advertising. In connection with this Facebook receives data about your IP address and information about your device and the way you use HITSA.dk. When Facebook Inc. uses personal data collected via Facebook Pixels on HITSA.dk, to improve their advertising system, for instance, Facebook Inc. and HITSA can be regarded as being joint data controllers. Please refer to Facebook's Data Policy in this context ([find out more here](#)).

### 4.2

In connection with delivery of goods that you have purchased from HITSA, data such as your name, address, e-mail address, telephone number along with order number and specific delivery requests will be passed to the carrier responsible for delivery of the purchased goods to you.

### 4.3

We reserve the right to disclose and make use of your personal data within other companies in the HITSA group, insofar as disclosure is necessary in order to fulfil the original purpose of collecting your personal data.

### 4.4

Data about you processed by HITSA in the context of a collaborative relationship will not be disclosed to third parties unless this is necessary for the purpose of the relationship, or

necessary to enable us to pursue a legitimate interest, e.g. in connection with disputes, where the data may be disclosed to authorities and legal bodies.

### 4.5

We use data processors, including providers of software, for activities such as backup, security and storage. In such cases your personal data will be made available to third parties, instructed by us to process your personal data on our behalf. The data processors only process your personal data for the specific purposes for which the data has been gathered. We require these data processors to process your personal data confidentially and to take the appropriate technical and organisational security measures to ensure that data is not accidentally or unlawfully destroyed, lost or compromised, does not come to the knowledge of unauthorised parties, is not misused or otherwise processed in contravention of the General Data Protection Regulation.

## 5. YOUR RIGHTS

### 5.1

With a view to creating transparency regarding processing of your data, as data controller we must inform you of your rights.

### 5.2

Right of access

#### 5.2.1

You are entitled to ask us at any time what data we have registered about you, what purpose said registration serves, what categories of personal data and recipients of data there may be, as well as information about the source of the data.

#### 5.2.2

You are entitled to be supplied with a copy of the personal data we process about you. If you would like a copy of your personal data, you should send a written request to [hitsa@hitsa.dk](mailto:hitsa@hitsa.dk). You will be asked to provide documentary proof of your identity.

### 5.3

The right to rectification

#### 5.3.1

You are entitled to have inaccurate personal data about you rectified by us. If you become aware that there are errors in the data we have registered about you, you are encouraged to contact us in writing, so this can be corrected. You will be asked to provide documentary proof of your identity.

### 5.4

The right to erasure

#### **5.4.1**

In certain cases you are entitled to have all or some of your personal data erased by us, for example, if you withdraw your consent, and we have no other legal basis to continue processing. To the extent that continued processing is necessary, for example, in order to comply with our legal obligations, or so that legal claims can be established, exercised or defended, we are not obliged to erase your personal data. You will be asked to provide documentary proof of your identity.

#### **5.5**

The right to restrict processing to storage

#### **5.5.1**

In certain cases you are entitled to have processing of your personal data restricted to storage only, e.g. if you believe that the data we are processing about you is not correct.

#### **5.6**

The right to data portability

#### **5.6.1**

In certain cases you are entitled to have personal data that you yourself provided to us supplied in a structured, commonly used and machine-readable format and are entitled to transfer this data to another data controller.

#### **5.7**

The right to withdraw consent

#### **5.7.1**

You are entitled at any time to withdraw consent you have granted to us for certain processing of personal data, including for forwarding of newsletters and targeted marketing. If you wish to withdraw consent, you must contact [hitsa@hitsa.dk](mailto:hitsa@hitsa.dk).

#### **5.8**

The right to complain

#### **5.8.1**

You are entitled at any time to lodge a complaint with the Danish Data Protection Agency regarding our processing of your personal data. Complaints can be lodged by e-mail to [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk) or by telephone on +45 33 19 32 00, among other methods.

### **6. ERASURE OF PERSONAL DATA**

#### **6.1**

Data collected about your use of [HITSA.dk](http://HITSA.dk) in accordance with point 2.1 is erased as per the rules in the HITSA Cookie Policy. The individual expiration dates are listed in the Cookie Declaration.

#### **6.2**

Data collected in connection with your purchases and communication with HITSA (see point 2.2) will be erased once your communication has been concluded and finalised, unless it is stored in your customer file (see section 5), and is erased 5 years after the customer relationship ceases.

#### **6.3**

Data collected in connection with your subscription to our newsletter (see point 2.3) is erased when you unsubscribe from the newsletter, unless we have another basis for processing said data.

#### **6.4**

Data you provide through HITSA's social media profiles (see point 2.4) will, as a rule, remain on these profiles as a part of the page history. You can erase your data on HITSA's social media profiles whenever you wish.

#### **6.5**

Data that originates from a collaborative relationship (see point 2.5) is stored as long as it remains relevant with respect to the existing or potential collaborative relationship and for a subsequent period, as long as is necessary to enable HITSA to document the relationship.

### **7. SECURITY**

#### **7.1**

We have implemented appropriate technical and organisational security measures to ensure that personal data is not accidentally or unlawfully destroyed, lost, amended or compromised, and does not come to the knowledge of unauthorised parties or is not misused.

#### **7.2**

Only employees who have a genuine need to access your personal data to carry out their work have access to such data. Such employees are instructed in how to process personal data securely.

### **8. CONTACT INFORMATION**

#### **8.1**

HITSA A/S, CVR no. 1500 4886, is the data controller for the personal data collected by HITSA.

#### **8.2**

If you have any questions or comments regarding this Personal Data Policy or wish to exercise one or more of your rights as described in section 5, you can contact:

HITSA A/S  
CVR no. 28 85 41 02  
Albuen 37, DK-6000 Kolding, Denmark  
Tel: +45 7557 4155  
E-mail: [hitsa@hitsa.dk](mailto:hitsa@hitsa.dk)

## **9. CHANGES TO THE PERSONAL DATA POLICY**

### **9.1**

This Personal Data Policy is regularly updated. The valid version is the one that can be found at any time on [HITSA.dk](https://hitsa.dk).

## **10. VERSIONS**

### **10.1**

This is version 2 of HITSAS Personal Data Policy, dated 03 Marts 2021.