

PRIVACY POLICY

Introduction

Welcome to THORNICO A/S, where we prioritize your privacy and the protection of your personal data. Our Privacy Policy outlines how we handle your personal data and explains how we use the data you provide when using our website and services.

In this Policy, we define Personal Data as any information that, either alone or when combined with other available information, can identify an individual.

It's essential to be aware that this Policy does not extend to third-party applications, websites, products, services, or platforms that may be accessed through links provided by us. These external sites operate independently from THORNICO A/S and have their own distinct privacy and data collection practices. When providing personal data to these websites, their respective third-party privacy policies will govern the handling of such information. We cannot assume responsibility for the actions, policies, content, or privacy practices of these independent sites.

Data Controller

THORNICO A/S (hereinafter referred to as "we," "us," or "our"), with registered address at Havnegade 36, 5000 Odense, and CVR no.: 15960205, is the data controller responsible for the processing of your personal data as described in this Policy.

If you have any questions regarding this Policy or the processing of your personal data, please feel free to contact us at GDPR@thornicoit.com.

Collection of Personal Data

We only process your personal data when it is necessary to comply with the purposes for which the personal data was collected, or if it is necessary to comply with our legal obligations.

The information we collect may include your name, email address, and other identifying details, as well as data about your navigation on our website. When submitting your data, we will clearly indicate whether it is voluntary or necessary to fulfill your intended action.

Your personal data may be collected under one or several of the following circumstances:

- Signing up for THORNICO's newsletter
- Contacting the company
- Submitting job applications
- For statistical purposes
- Other marketing initiatives

If you use your email address in more than one of the above cases, your personal data will only be collected and registered in one place. This way you will not receive the same marketing material from THORNICO A/S more than once.

Purpose and Legal Basis

At THORNICO, we process personal data for various purposes, as highlighted below, while ensuring the appropriate legal basis for each processing activity.

Social media

We actively use social media platforms, including Facebook, Instagram, and LinkedIn, to engage with both our existing and potential customers while promoting our marketing initiatives. If you have visited and "liked" our fan page or have interacted with us on these platforms, we inevitably process some of your personal data. This processing includes information such as your name, email, and any other data obtained through cookies from these social media channels. Additionally, relevant purchase details may be processed if they are contextually relevant.

When you contact us through social media, we process your personal data based on our legitimate interest to establish communication and respond to your inquiries (GDPR Article 6(1)(f)). The information is collected both from you as a data subject and from the social media platform through which you reached out to us.

You can read more about the social medias processing of your personal data in the links below:

- Facebook and Instagram's processing of your personal data [here](#).
- LinkedIn's processing of your personal data [here](#).

Newsletter

When you sign up for our newsletter, we process your personal data (name and email) based on your consent to direct marketing in accordance with GDPR Article 6(1)(a) and section 10 of the Danish Marketing Act. The purpose of the processing is to give you news and stories from the THORNICO world.

We process your personal data until you unsubscribe from our newsletter.

Job applications

We process personal data provided in job applications or unsolicited applications. The processed information may include your name, contact details (phone number, email, address), birthdate, photograph, application, CV, work history, educational background, and references, depending on the data you've provided.

The purpose of this data processing is to evaluate your application and potentially establish an employment relationship. This processing is carried out based on your explicit request for us to

assess your application. In certain cases, we may also process information about you when we determine that our legitimate interests outweigh any potential impact on your rights and interests, as stated in GDPR Article 6(1)(f). This may involve using publicly available information from your social media profiles or conducting personality and skills assessments.

If we plan to retain your personal data beyond the recruitment period, we will seek your consent, as required by GDPR Article 6(1)(a).

Virtual meetings

When you participate in a virtual meeting in one of the companies in Thornico conglomerate, the meeting can be recorded and transcript for the purpose of documentation and summary. You will be informed in advance in the notice of the meeting that recording and transcription can occur, and it will be visible for you at the start of the meeting if the meeting is recorded and transcribed. If you do not wish to attend in a recording and transcription, please contact the responsible for the meeting. We process personal data based on the organization's legitimate interests in documenting the meeting's result correctly in accordance with GDPR Article 6(1)(f).

The recording and transcript are kept for 120 days, before it is deleted.

Contact

When you get in touch with our company through email, phone, or any other communication, we collect and process personal data in accordance with GDPR Article 6(1)(f). The primary purpose of processing your personal data is to provide efficient customer support and effectively respond to your inquiries.

The data we may gather through the contact email includes your name, email address, phone number, company, and any other information you voluntarily share during the communication.

Data Security

We have implemented robust technical and organizational measures to ensure the security and confidentiality of your personal data. These measures include encryption, firewalls, access controls, and regular system monitoring. We strive to maintain the integrity and confidentiality of your information, protecting it against unauthorized access, alteration, or disclosure.

Transfer to other Data Controllers

We do not transfer your personal data to a third party without your consent. Under specific circumstances and with reference to legislation, it might be necessary to transfer information to public authorities or the police. For example, information may be disclosed to the police in case of suspicion of credit card fraud.

Disclosure to Data Processors

We may share your personal information with trusted third-party service providers who assist us in delivering our services and maintaining our website's functionality. These providers are contractually obligated to handle your personal data with the same level of confidentiality and security as we do. We will never sell or disclose your personal information to third parties for their marketing purposes without obtaining your explicit consent.

We may also disclose your personal data to external third parties if required by law or as part of the services we provide you.

Transfer of Personal Data to Third Countries

We may transfer your personal data to international organizations or companies established in countries outside the EU/EEA, to the extent necessary for the processing purposes. Such transfers are made only when we have a solid legal basis, which may include scenarios where the European Commission has evaluated that the security measures in the relevant third country align with the requirements of Article 45 of the GDPR. Additionally, we may make transfers if there are other security guarantees in place, such as the adoption of EU Commission's standard contractual clauses as outlined in Article 46 of the GDPR.

Deletion of Personal Data

We will delete your personal data when we no longer need to process them in relation to one or more of the purposes listed above.

Should you desire additional information regarding the specific retention periods for particular processing activities, please do not hesitate to reach out to us via email at GDPR@thornicoit.com.

Cookies

Our website uses cookies to enhance your user experience and provide you with personalized services. Cookies are small text files stored on your device when you visit our website. These files collect certain personal data, such as your IP address, browser type, device information, and interactions with the website. We process this personal data to improve our services, analyze traffic, and deliver relevant advertisements.

The processing for marketing purposes is carried out based on GDPR Article 6(1)(a). The processing for other purposes such as statistics, optimizing functionality, and similar objectives, is based on GDPR Article 6(1)(f). THORNICO's legitimate interest is to develop and maintain a relevant website that functions optimally.

We also utilize cookies to remember your preferences and settings, making your future visits more convenient and tailored to your needs. For more information on how we use cookies and process your personal data, please refer to our Cookie Policy.

Your Rights

According to legislation, you have certain rights in relation to our processing of personal data about you. The right to rectification (change): You have the right to have inaccurate information about yourself corrected.

The right to erasure: In exceptional cases, you have the right to have the data processed about you erased before the date of the general erasure (see above under "Duration of storage of recorded data").

The right to restrict the processing: In certain cases, you have the right to have the processing of your personal data restricted to storage only.

The right to object: In certain cases, you have the right to object to the otherwise lawful processing of your personal data by the organization. Read more about your rights here: [Data protection and online privacy - Your Europe \(europa.eu\)](#) You assert these rights by contacting GDPR@thornicoit.com.

There may be limitations to your rights, and it is therefore not certain that you have the right to have your personal data deleted in the specific case as it will depend on the specific circumstances of the processing.

Withdrawal of Consent

If we process your personal data based on your consent, you have the right to withdraw that consent at any time by contacting us at info@thornico.com.

Please note that withdrawing your consent will not affect the lawfulness of any processing that was done prior to the withdrawal.

We respect your rights under GDPR, and your decision to withdraw consent will be promptly acknowledged and respected.

Questions and Complaints

If you have any questions regarding the processing of your personal data, please contact us by email at GDPR@thornicoit.com.

If you have any complaints about THORNICO's processing of your personal data, you have the right to file a complaint to the competent supervisory authority.

You can download a list of European Supervisory Authorities here: [Our Members | European Data Protection Board \(europa.eu\)](#)