

CHANGING THE GAME AT SEA

An aerial photograph of turbulent ocean water, showing swirling currents and white foam. The water is a deep teal color. At the bottom of the image, there is a semi-transparent grey overlay with a white geometric grid pattern. The text 'Privacy Policy for Website' is centered within this overlay.

Privacy Policy for Website

Company SH Group A/S
Process owner Kenneth Koch
Last updated 05 Month 2023



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Introduction

This privacy notice explains how SH Group A/S ("we", "us", "our") processes personal data in various situations.

We provide you with this information as we are required to do so under the General Data Protection Regulation (the "GDPR").

Below, please find information on the various situations where we process personal data (each section will contain information of data controllership in the specific situations):

- Business purposes – see section 2.1.
- Website operations – see section 2.2.
- Video surveillance (CCTV) – see section 2.3.
- Marketing purposes – see section 2.4.

Controller

SH Group A/S acts as a data controller for the processing of personal data in connection with the below mentioned purposes. You can find our contact details in section 8 below.

Retention of data:

SH Group is required to retain data for up to 50 years, considering our deliveries in sectors such as defence industry, ship contracts, and maritime rescue equipment. Examples within these sectors require data to remain accessible throughout the ship's lifespan. Data is retained to comply with regulatory and contractual obligations, as well as to support future needs for monitoring, maintenance, and analysis of the deliveries.

Description of the processing

Below, please find the specific purposes for our data processing, the categories of personal data that we process, the legal basis for such processing, and the retention periods that we have decided (in specific situations, we may defer from our general retention periods in case of e.g., complaints, objections, or other specific situations).

Business purposes

Purpose	Categories	Legal basis	Retention
Communicating with you when you represent a customer, partner, supplier, or another third party.	Name and contact information, title, and position. The relationship to the business that you represent.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interests in managing business contacts and fulfilling any agreement, we may have concluded with the company you represent.	Please refer to the section regarding the retention of data.

Managing and answering general inquiries.	Name and contact information, title, and position. The subject of your inquiry.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interests in managing general inquiries.	Please refer to the section regarding the retention of data.
Bookkeeping purposes.	Information stated on invoices etc.	Article 6(1)(c) of the GDPR. For the Danish entities, the legal obligations derive from the bookkeeping legislation.	Up to 5 years after the end of the financial year in which the customer or supplier relationship has ended.

Website operations

Purpose	Categories	Legal basis	Retention
To compile statistics in order to optimize the user experience on our website and the services we offer. See our cookie policy https://shgroup.dk/privacy-policy/	Activity on our website and applications, including IP-addresses, browser used, operating system, pages visited etc.	Consent based on article 6(1)(a) of the GDPR and the Danish cookie regulation.	See our cookie policy https://shgroup.dk/privacy-policy/

Video surveillance (CCTV)

Purpose	Categories etc.	Legal basis	Retention
To prevent and solve criminal offences at the Danish entities. We have put up signage in the places where we have installed CCTV cameras.	Time and place/location, actions recorded by the CCTV cameras.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interests related to prevent and solve criminal offences. If the recordings show criminal offences, the legal basis is section 8 of the Danish Data Protection Act.	Up to 30 days, unless the information is part of or will be used in a specific case or dispute.

Marketing activities

Purpose	Categories	Legal basis	Retention
Facilitating marketing events, webinars, pitch meetings, participating in industrial fairs, etc.	Name and contact information, title, and position. The relationship to the business that you represent.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interests in managing your personal data when participating in marketing events etc.	Please refer to the section regarding the retention of data.

Categories of recipients

We disclose your personal data to our relevant business partners, including external advisors. Further, we share your personal data within the group of companies, if relevant in connection with your request or relation to us.

Also, we make your personal data available to our processors who for example, host, develop, and support our IT systems. Further, CCTV video recordings may if relevant be shared with the po-lice.

Moreover, please refer to our cookie policy <https://shgroup.dk/privacy-policy/> in relation to third party providers and recipients.

Transfer to third countries

We transfer your personal data to a processor located in third countries. This includes United States

The legal basis for our transfer is the Commission Decision of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

If you want additional information about our transfer of personal data to third countries, including a copy of the above-mentioned standard contractual clauses, you may make a request for such additional information by contacting us (see section 8 below).

Your rights

You have the following rights:

- Right to withdraw consent: Where you have given your consent for our processing of your personal data, you have the right to withdraw your consent at any time. You can withdraw your consent by contacting us (see contact details below).
If you withdraw your consent, the withdrawal will not affect the lawfulness of processing that has already been carried out based on your consent.

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- **Right of access:** You have the right to have confirmed whether collection or processing your personal data has taken place, and, if so, you have the right to request a copy of your personal data in a digital format.
- **Right of rectification:** You have the right to require that we correct any inaccurate personal data, and that we complete incomplete personal data.
- **Right of erasure:** In certain circumstances, you have the right to request that we erase personal data concerning you; for example, if it is no longer necessary for the purposes in which it was originally collected.
- **Right to restrict processing:** In certain circumstances, you have the right to request that we restrict the processing of your personal data, for example, if you believe that the personal data is not accurate or lawfully processed.
- **Right to object to the processing:** In certain circumstances, you have the right to request that we stop processing your personal data.
- **Right to data portability:** In certain circumstances, you have the right to receive the personal data you have provided us with in a structured, commonly used, machine readable format, and the right to have us transmit the data to another entity, where technically feasible.

You can read more about your rights in the Danish Data Protection Agency's guidelines on data subjects' rights, which is available at datatilsynet.dk (in Danish) and at datatilsynet.dk (in English). Please contact us if you wish to exercise any of your rights. The relevant contact details are stated below.

There may be conditions or limitations on these rights. It is therefore not certain for example you have the right of data portability in the specific case; this depends on the specific circumstances of the processing activity.

Complaint to a supervisory authority

If you want to lodge a complaint with a supervisory authority about our processing of your personal data, you can do so by contacting the Danish Data Protection Agency via their website, www.datatilsynet.dk.

Contact information etc.

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