

# Personal Data Policy – Customers, suppliers.

Introduction .....	1
1. Data controller – contact information.....	2
2. Where does the personal data come from?.....	2
3. What personal data do we process about Stakeholders? .....	2
4. Purpose of the processing and legal basis.....	3
5. Recipients of your personal data .....	3
6. Storage and erasure .....	4
7. Stakeholder’s rights.....	4
8. Right to complain .....	5

## Introduction

When providing our services within healthcare marketing and communication, Androbin ApS (“&Robin” or “we”) processes personal data related to customers, suppliers, market research respondents and other stakeholders (collectively the “Stakeholders” or “you”)

Under Article 13 and 14 of the General Data Protection Regulation (“GDPR”), we are required to provide our Stakeholders with certain specific information on the collection and processing of their personal data.

With this **Personal Data Policy**, we intend to provide you with the required information and give a clear understanding of how your personal data is processed and the rights you have in relation to it.

## 1. Data controller – contact information

&Robin is data controller in connection with the processing of your personal data.

You may contact us if you wish to exercise your rights described in [section 7 below](#), if you wish to file a complaint about our processing of personal data, or if you have any other questions regarding our personal data policy.

Our contact details are:

Androbin ApS  
CVR number: 40482377  
Farvergade 8, 5. sal  
1463 København K

Phone.: + 45 25 36 59 50  
E-mail: [hello@androbin.dk](mailto:hello@androbin.dk)  
<https://androbin.dk/>

## 2. Where does the personal data come from?

&Robin collects personal data about our Stakeholders primarily from the Stakeholders themselves.

In most cases, our customers and suppliers are not physical individuals but rather legal persons and, in these cases, we process personal data on the employees of such entities.

## 3. What personal data do we process about Stakeholders?

In connection with our normal business operations, we may process the following information about customers, suppliers and their employees:

*Identification and contact information, including name, address, e-mail, and phone number as well as information regarding job function, title and workplace.*

We do not normally process special categories of personal data about customers, suppliers and their employees comprised by Article 9 of the GDPR.

\* \* \*

When we conduct market research for our customers, we may process the following personal data on participants in the market research (the respondents):

- *Identification and contact information, including name, address, e-mail, and phone number*
- *Bank information*
- *Photos and video recordings from interviews*

- *The respondents' answers to questions and input to the themes covered by the market research, which may include information on personal preferences in relation products etc. and previously or expected behaviour in certain situations.*

For market research respondents, we may also process health data comprised by GDPR art. 9 if relevant in the specific market research and provided by the respondent.

## 4. Purpose of the processing and legal basis

In relation to **customers and suppliers** (and their employees), &Robin processes personal data for the purpose of administrating customer and supplier relationships, delivering services to customers and acquiring goods and services from suppliers.

The legal basis such processing of personal data is Article 6(1)(b) and (f) of the GDPR, which allows us to process personal data when it is necessary:

- for the fulfilment of the contract between &Robin and the customer or supplier or in order to take steps at the request of the customer or supplier prior to entering into a contract; and
- when it is necessary to pursue one of our legitimate interests, provided that your interests in preventing the processing of your personal data does not outweigh ours. Our legitimate interests may comprise our interest in fulfilling the tasks required by the customer, in developing our relationship with the customer or supplier and in developing our services.

\* \* \*

In relation to **market research respondents**, &Robin may process personal data on respondents for the purpose of providing customers with requested market research.

The legal basis of such processing of personal data is Article 6(1)(a), (b) and (f) of the GDPR, which allows us to process personal data when:

- the respondent has given consent to the processing of his/her personal data;
- it is necessary for the fulfilment of the contract between &Robin and the respondent or in order to take steps at the request of the respondent prior to entering into a contract; and
- it is necessary to pursue one of our legitimate interests, provided that your interests in preventing the processing of your personal data does not outweigh ours. Our legitimate interests may comprise our interest in performing the market research agreed with the customer, in ensuring proper documentation of the respondents' input and the conclusions drawn here from and in developing our market research services.

Personal data regarding market research respondents' sensitive personal data on health information is processed solely with the applicant's consent, based on Article 9(1)(a).

## 5. Recipients of your personal data

&Robin may disclose the Stakeholders' personal data to business partners such as banks, external accounting firms and lawyers.

Also, personal data about the Stakeholders may be disclosed to &Robins IT-suppliers as part of &Robin's use of services provided by such suppliers.

In general, we do not transfer your personal data to countries outside of the EU/EEA. Such transfers may, however, take place in connection with our use of software services provided by our IT-suppliers. If your personal data are transferred to countries outside the EU/EEA, we ensure that there is an adequate level of protection. Primarily, this is relevant for the USA where certain of our IT-suppliers are based and, in these situations, we have ensured that the recipients participate in the EU-U.S. Data Privacy Framework scheme.

## 6. Storage and erasure

In general, we will only retain the Stakeholders' personal data for as long as is necessary to fulfil the purposes described above.

Personal data on **customers and suppliers** (and their employees) is deleted within three years after the relation with the customer or supplier has terminated or – if applicable – that later time when any guarantee period for good or services delivered or purchased has expired.

Personal data on market research respondent is deleted within five years after the market research has been finalised and reported to the customer.

If we have legitimate interest therein, e.g. if a legal dispute has arisen related to the customer, market research respondent etc., &Robin may retain personal data for an extended period.

## 7. Stakeholder's rights

Under the GDPR, you have several rights concerning our processing of your personal data. These rights include:

- a) **Right of access:** You have the right to access the data we process about you, as well as certain additional information hereon.
- b) **Right to rectification:** You have the right to have incorrect information about yourself corrected.
- c) **Right to erasure:** In certain cases, you have the right to have your data deleted before our general deletion practices take effect.
- d) **Right to restrict processing:** In certain situations, you have the right to restrict our processing of your personal data.
- e) **Right to object:** In certain cases, you have the right to object to our otherwise lawful processing of your personal data.
- f) **Right to data portability:** In certain cases, you have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to have those data transferred from &Robin to another data controller.

Further, if &Robin is processing your personal data based on your consent, you are entitled to withdraw your consent at any time. This does not, however, affect the legitimacy of &Robin's processing prior your withdrawal of your consent.

If you wish to exercise any of your right or if have questions, you may contact us using the contact information set forth [above under item 1](#).

## **8. Right to complain**

If you find that &Robin's processing of your personal data is not in compliance with applicable data protection rules, you may file a complaint with the Danish Data Protection Agency.

The Danish Data Protection Agency's contact details are available on <https://www.datatilsynet.dk/kontakt>.