



PRIVACY POLICY

This privacy policy applies to Gefion Group A/S, business registration no.: 37 04 25 60, ("Gefion Group") and its associated project companies. A full list of associated project companies can be seen at the bottom of this policy.

Gefion Group is a data controller and thus responsible for the data collected about you. We ensure that your personal data are processed in accordance with existing legislation.

We take our data protection seriously and have therefore adopted this privacy policy informing you of how we process and treat your data.

CONTACT INFORMATION

Please do not hesitate to contact us by e-mail regarding our processing of your personal data:

Gefion Group A/S
Østergade 1, 1. floor
1100 Copenhagen
Privacy@gefiongroup.com

For inquiries concerning Rødovre Port, please send an e-mail to:

privacy@roedovreport.com

PROCESSING OF PERSONAL DATA

Personal data are all information which can be assigned to you. If you do not wish for us to process data about you, it may be difficult for us to adequately maintain and/or comply with concluded contracts or legal obligations.

POTENTIAL TENANTS

To be registered on our waiting list for a home, we need to collect the following personal data about you:

- Name, e-mail, phone number

We share your personal data with our real estate agent.



We collect personal data for the following purposes:

- The possibility of offering you a home in the future
- Administration of interrelationships

We collect data on the following legal basis:

- The processing of your personal data is based on your consent, which you give when you sign up for our waiting list

We store the data in the period established by legislation and delete the data when the data are no longer relevant. The period depends on the character of the data and the reason for the processing. Data regarding potential tenants will be deleted when you withdraw your consent.

TENANTS

To be considered a tenant at Gefion Group, we need to collect the following personal data about you:

- Name, e-mail, phone number, address, education, bank information, optionally copies of pay checks
- Social security number (CPR)

We share your personal data with our real estate agent and the administrator of the property.

We collect the data for the following purposes:

- To be able to rent you a home
- Continuously tenant administration

We collect the data on the following legal basis:

- Processing of personal data is based on fulfillment of the lease agreement

We store the data in the period established by legislation and delete the data when the data are no longer relevant. The period depends on the character of the data and the reason for the processing. Typically, data regarding tenants are deleted 3 years after the lease is terminated.

PRIVATE BUYERS

If you wish to buy a home from us, we need to collect the following personal data about you:



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- Name, e-mail, phone number, address, citizenship, occupation, bank guarantees

We share your personal data with our real estate agent and the administrator of the property.

We collect the data for the following purposes:

- Sale of home

We collect the data on the following legal basis:

- Processing of personal data is based on fulfillment of the purchase agreement

We store the data in the period established by legislation and delete the data when the data are no longer relevant. The period depends on the character of the data and the reason for the processing. Typically, data regarding private buyers will be deleted at the end of the agreement or when the correspondence is no longer relevant.

- Your information and the purchase agreement will be deleted 5 years after the 1-year inspection of the home

SUPPLIERS AND PARTNERS

To order to be a supplier or partner, we need to collect the following personal data about you:

- Name, e-mail, address, phone number, payment information, business registration no. for sole proprietorship

We collect personal data for the following purpose:

- Processing of purchases/services
- Administration of interrelationships

We collect the data on the following legal basis:

- The processing of personal data is based on fulfillment of contractual obligations
- The company is legally obligated to document deposits and withdrawals in accordance with the Danish legislation "*Bogføringsloven*"

We store the data in the period established by legislation and delete the data when the data are no longer relevant. The period depends on the character of the data and the reason for the



processing. Typically, data regarding suppliers and partners will be deleted upon termination of the agreement:

- Data which are relevant for accounting is processed until the end of the current year + 5 years in accordance with "*Bogføringslovens § 10*"
- Data about suppliers/partners are processed until the end of the current year + 5 years

JOB APPLICANTS

When we receive your job application, it will be processed in accordance with the following procedures:

The job application, including attachments, is shared with relevant employees in the recruiting process.

In certain cases, we use external recruiting agencies, who are given access to your application, including attachments.

Any personal data collected in the recruitment process are processed based on the following legal basis:

The processing of the data is the interest of the company and the registered with a view to a future collaboration where the legal basis is a balancing of interest.

If we obtain references, it is solely obtained if you give us your consent.

We store your job application, including attachments, for 6 months. Hereafter, your job application will be deleted.

Unsolicited job applications, including attachments, will be stored for 6 months after which they will be deleted.

If we want to store your job application, including attachments, for more than 6 months, we will contact you for you to give your consent. Your consent is voluntarily, and you can withdraw it any time, please see contact information above.



OTHER INFORMATION ABOUT PROCESSING

SECURITY

We have taken the necessary technical and organizational measures to prevent that your data accidentally or illegally get deleted, released, lost, impaired or are disclosed to unauthorized persons, abused or in any way processed without legal grounds. The data controller ensures that processing only takes place, when all principles of data protection are fulfilled (GDPR, art. 5).

DATA MINIMIZATION

We only collect, process and store the personal data necessary to fulfill our purpose. Furthermore, it may be determined by law which type of data is necessary to collect and store in connection with our business practices. The type and the extent of the personal data we process can be determined by the need to comply with a contract or any other legal obligation.

DATA IS UP TO DATE

Since our service depends on the fact that your data are correct and up to date, we ask you to inform us about relevant changes in your personal data. You can make use of the contact information provided above to inform us about the changes. We will then make sure your data are updated. If we notice incorrect data, we will update the data and inform you.

NEWSLETTER/HOME AGENT

Your consent to receive our newsletter/home agent is optional, and you can withdraw it by contacting us at any time. Please use the contact information above.

TRANSFERRING DATA

We use several third parties for storage and processing of data, including suppliers of IT solutions, external real estate agents. These only process data on our behalf and may not use the data for their own purposes. In relevant situations, data are passed on to e.g. banks, debt collection, cargo firms or public authorities, etc.

We only use data processors in the EU or third countries that have the necessary security guarantees, and companies in countries that can provide your data proper protection. If transferring to the United States (Microsoft, Dropbox and Mailchimp), we have entered into a SCC-Contract and the transfers have been assessed by a Transfer Impact Assessment (TIA).



SHARED DATA RESPONSIBILITY (WHEN USING SOCIAL MEDIA)

We use the following social media: Facebook, Instagram and LinkedIn which are categorized as shared data responsible. Shared data responsibility means that no personal data are passed on, but both parties are responsible for the purpose and processing of personal data.

If customer testimonials or anything like that are published, the legal basis is: Consent.

YOUR RIGHTS

- At any time, you have the right to be informed of the data we process about you, from where we have collected the data and what we use the data for. You may also be informed about how long we store your data, and who receives the data about you, to that extent we pass on data in Denmark and to foreign countries.
- Upon request, we can inform you about the data we process about you. The access might be limited with respect to privacy protection, business secrets and immaterial rights.
- If you think that the personal data, we process are incorrect, you have the right to have the data corrected. In that case, please contact and inform us with the correct data. Make sure to be as precise as possible with your corrections, otherwise it may make it difficult or even impossible to comply with your request.
- In some cases, we will have an obligation to delete your personal data. This is for instance the case if you withdraw your consent. If you think that your data are no longer necessary for the purpose for which the data were collected, you can request for the data to be deleted. Please also contact us if you believe that your data are processed in contravention of the law or other legal obligations. When you contact us with a request to have your personal data corrected or deleted, we will look into whether the requirements are fulfilled, and if that is the case, change or delete your data as soon as possible.
- You can file a complaint with the Danish supervisory authority "*Datatilsynet*".
- You have the right to object to the processing of your personal data. You can also object to our passing of your data for marketing purposes. If your objection is justified, we will stop the processing and/or passing of your personal data.
- You can make use of data portability if you want your data transferred to another data controller or data processor.



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- On our own initiative, we delete your personal data, when the data are no longer needed for the purpose for which the data were collected.

When you contact us with a request to have your personal data corrected or deleted, we look into if the requirements are fulfilled, and if so correct or delete the data as fast as possible.

You can make use of your rights by contacting us. You can find our contact information above.

[LIST OF ASSOCIATED PROJECT COMPANIES](#)

1. Gefion Group Holdco ApS – business registration no.: 39 31 27 94
2. Gefion Group Holdco II ApS – business registration no.: 37 77 93 69
3. Gefion Group Holdco III ApS – business registration no.: 55 66 00 18
4. Gefion Byg ApS – business registration no.: 42 31 87 95
5. Amager Strandvej 60-64 / Ved Amagerbanen 37 ApS – business registration no.: 37 51 14 55
6. GG St. Kongensgade 100 & 106 P/S – business registration no.: 38 30 68 47
7. Rødovre City P/S – business registration no.: 37 27 19 77
8. Kanalgaden 3 ApS – business registration no.: 39 16 47 95
9. HKP 1A Holding ApS – business registration no.: 39 34 89 42
10. GG Development 8 ApS – business registration no.: 38 24 05 52
11. GG KBV P/S – business registration no.: 41 88 05 89
12. GG MBVH A/S – business registration no.: 39 46 36 87
13. GG Horneby P/S – business registration no.: 42 01 67 21
14. K/S GG Østed – business registration no.: 42 28 35 25
15. K/S GG Ørnesædevej Havdrup – business registration no.: 42 34 50 67



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16. Klostergårdsvej ApS – business registration no.: 41 32 56 82

17. GG Køge K/S – business registration no.: 43 01 33 51

18. GG Billund Hovedgade P/S – business registration no.: 43 16 57 98

19. GG Frederikssundsvej 100 K/S – business registration no.: 43 83 80 32