



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. Gefion Group ensures that your personal data is processed in accordance with existing legislation.

Gefion Group takes data protection seriously and has therefore adopted this privacy policy informing you of how Gefion Group processes and treats your data.

CONTACT INFORMATION

Please do not hesitate to contact Gefion Group by e-mail regarding the processing of your personal data:

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

PROCESSING OF PERSONAL DATA

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

POTENTIAL TENANTS

To be registered on Gefion Group's waiting list for a home, Gefion Group needs to collect the following personal data about you:

- Name, e-mail, phone number

Gefion Group shares your personal data with a real estate agent.

Gefion Group collects personal data for the following purposes:

- The possibility of offering you a home in the future



- Administration of interrelationships

Gefion Group collects 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

Gefion Group stores the data in the period established by legislation and deletes the data when the data is 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, Gefion Group needs 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)

Gefion Group shares your personal data with a real estate agent and the administrator of the property.

Gefion Group collects the data for the following purposes:

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

Gefion Group collects the data on the following legal basis:

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

Gefion Group stores the data in the period established by legislation and deletes the data when the data is 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 Gefion Group, Gefion Group needs to collect the following personal data about you:

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

Gefion Group shares your personal data with a real estate agent and the administrator of the property.

Gefion Group collects the data for the following purposes:

- Sale of home

Gefion Group collects the data on the following legal basis:

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

Gefion Group stores the data in the period established by legislation and deletes the data when the data is 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, Gefion Group needs to collect the following personal data about you:

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

Gefion Group collects personal data for the following purpose:

- Processing of purchases/services
- Administration of interrelationships

Gefion Group collects 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*"

Gefion Group stores the data in the period established by legislation and deletes the data when the data is 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 Gefion Group receives a 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, Gefion Group uses external recruiting agencies, who are given access to the application, including attachments.

Any personal data collected in the recruitment process is 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 Gefion Group obtains references, it is solely obtained if you give Gefion Group your consent.

Gefion Group stores the job application, including attachments, for 6 months. Hereafter, the job application will be deleted.

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



If Gefion Group wants to store the job application, including attachments, for more than 6 months, Gefion Group 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

Gefion Group has taken the necessary technical and organizational measures to prevent that data accidentally or illegally gets 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

Gefion Group only collects, processes and stores the personal data necessary to fulfill Gefion Group's purpose. Furthermore, it may be determined by law which type of data is necessary to collect and store in connection with Gefion Group's business practices. The type and the extent of the personal data Gefion Group processes can be determined by the need to comply with a contract or any other legal obligation.

DATA IS UP TO DATE

Since Gefion Group's service depends on the fact that data are correct and up to date, Gefion Group asks you to inform Gefion Group about relevant changes in your personal data. You can make use of the contact information provided above to inform Gefion Group about the changes. Gefion Group will then make sure the data is updated. If Gefion Group notices incorrect data, Gefion Group will update the data and inform you.

NEWSLETTER/HOME AGENT

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

TRANSFERRING DATA

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



Gefion Group only uses 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), Gefion Group has entered a SCC-Contract and the transfers have been assessed by a Transfer Impact Assessment (TIA).

SHARED DATA RESPONSIBILITY (WHEN USING SOCIAL MEDIA)

Gefion Group uses the following social media: Facebook, Instagram and LinkedIn which are categorized as "shared data responsible". Shared data responsibility means that no personal data is 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 Gefion Group processes about you, from where Gefion Group has collected the data and what Gefion Group uses the data for. You may also be informed about how long Gefion Group stores your data, and who receives the data about you, to that extent Gefion Group passes on data in Denmark and to foreign countries.
- Upon request, Gefion Group can inform you about the data Gefion Group processes about you. The access might be limited with respect to privacy protection, business secrets and immaterial rights.
- If you think that the personal data, Gefion Group processes are incorrect, you have the right to have the data corrected. In that case, please contact and inform Gefion Group 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, Gefion Group 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 is no longer necessary for the purpose for which the data was collected, you can request for the data to be deleted. Please also contact Gefion Group, if you believe that your data is processed in contravention of the law or other legal obligations. When you contact Gefion Group with a request to have your personal data corrected or deleted, Gefion Group will look into whether the requirements are fulfilled, and if that is the case, change or delete your data as soon as possible.



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- 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 Gefion Group's passing of your data for marketing purposes. If your objection is justified, Gefion Group 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.
- On Gefion Group's own initiative, Gefion Group deletes your personal data when the data is no longer needed for the purpose for which the data was collected.

When you contact Gefion Group with a request to have your personal data corrected or deleted, Gefion Group will 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 Gefion Group. You can find Gefion Group's contact information above.

LIST OF ASSOCIATED PROJECT COMPANIES

1. Gefion Group Holdco ApS – business registration no.: 39 31 27 94
2. Gefion Group Holdco III ApS – business registration no.: 55 66 00 18
3. Amager Strandvej 60-64 / Ved Amagerbanen 37 ApS – business registration no.: 37 51 14 55
4. Kalundborgvej Holbæk K/S – business registration no.: 44 49 63 64
5. GG MBVH ApS – business registration no.: 39 46 36 87
6. GG Horneby P/S – business registration no.: 42 01 67 21
7. K/S GG Osted – business registration no.: 42 28 35 25
8. K/S GG Ørnesædevej Havdrup – business registration no.: 42 34 50 67
9. Klostergårdsvej ApS – business registration no.: 41 32 56 82
10. GG Køge K/S – business registration no.: 43 01 33 51



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11. K/S GG Karlslunde Landsby – business registration no.: 44 14 31 51

12. GG Niels Juels Gade K/S – business registration no.: 44 90 45 94

13. GG Havnegade K/S – business registration no.: 44 84 21 81

14. K/S GG Hillerød Posthus – business registration no.: 44 71 77 51