

ATRIUM Partners ("ATRIUM") policy for processing personal information on customers, potential customers and other business relations who are identifiable natural persons

Introduction

The General Data Protection Regulation ("GDPR") applies to all information we have about identifiable natural persons.

Therefore, the rules do not apply to business companies, but they are of importance to you as a customer of ATRIUM if you have a sole proprietorship. They also matter if you, as a person, are affiliated with a company that is a customer of ours - for example, if you are the owner / real owner, subscriber or proxy holder of a company, we therefore have personal information about you

Purpose of processing personal data

ATRIUM collects and processes personal data on customers, potential customers and other business relations who are natural persons ("Commercial Relations") in order to provide customers with the best independent advice, to operate and develop ATRIUM, and to comply with applicable legislation as we are a financial establishment.

Categories of personal information

ATRIUM mainly processes so-called ordinary personal data in accordance with Article 6 of the GDPR. In addition, ATRIUM may be required to obtain the natural persons' CPR number as referred to in Article 87 of the GDPR.

Legal basis

ATRIUM collects and processes personal data in accordance with applicable law.

Customers

We collect and record personal data when the customer has signed or are considering entering into an agreement with us regarding financial advice, cf. Article 6 (1), point (b) of the GDPR or if the customer has consented to ATRIUM using personal information for a particular purpose, cf. Article 6 (1), point (a) of the GDPR.

According to the Act on Prevention of Money Laundering and Terrorist Financing, Chapter 3, ATRIUM is required to obtain documentation and identity information for its customers. If the customer is a natural person, name, address and CPR number, or similar, should be obtained if a CPR number is not available. In cases where the customer is not a natural person, similar information must be obtained from the legal entity's real owners, i.e. the circle of physical persons controlling, has a decisive influence on or, in particular, being met by the legal entity that constitutes the customer.

For existing customers who are natural persons, certain information about the customer's name, address, contact information and CPR number is collected and processed, and minutes of relevant meetings are recorded.

For previous customers, all information collected in connection with the customer relationship is stored in the period when the customer has had a mandate agreement with ATRIUM.

Commercial considerations in relation to the collection and processing of personal data

ATRIUM collects and processes personal information on commercial relations in accordance with the legitimate interests rule contained in Article 6 (1), point (f) of the GDPR. The legitimate interests justifying the collection and processing of personal data in ATRIUM vary with the nature of the specific external relationship, as further described below.

For potential customers, contact data is stored that enables ATRIUM to get in touch with the prospect and to refer the dialogue that has taken place over the time that ATRIUM has been in dialogue with the prospect. Contact data includes name, address, phone number and e-mail address. There are reports of conclusions from relevant meetings.

For existing as well as potential suppliers, contact data is stored that enables ATRIUM to get in touch with the relevant supplier.

Sources of personal data

Personal data collected by ATRIUM on customers is generally provided by the customer as part of the cooperation. Secondly, we collect information from the Central Business Register and other publicly available sources and registers.

Storing personal information on customers

ATRIUM stores the information as long as the customer relationship exists and as long as it is necessary for the purpose data has been registered and used. We therefore store information as long as we provide financial advice to the customer. Once the customer relationship with ATRIUM has ended, we usually save the customer's personal information for another 5 years. This is primarily to comply with our obligations under the Bookkeeping Act, the Anti-Money Laundering and the Financing of Terrorism Act and the Tax Control Act.

Retention of personal data on other commercial relations

ATRIUM saves personal information on commercial relations only as long as there is a commercial purpose. There may be dialogue with potential customers over a number of years before establishing a customer relationship, and therefore, in certain cases, ATRIUM stores personal information on potential customers over several years.

Third parties and your personal information

ATRIUM may, with the consent of customers, pass personal data to intra-group companies for administrative purposes.

We only disclose information about customers to public authorities if this is imposed on us by applicable law.

In connection with IT development, hosting and support, we transfer personal data to data servers, including third-country data third-country users. We ensure that customers' rights are protected and that

the level of protection is maintained in connection with such data transfers. This is done using standardized data processing agreements that reflect the rules in the GDPR.

Your rights as a customer in relation to personal data

The GDPR gives the customer certain rights, which can be summarized as follows:

The customer can, as a rule, gain insight into the personal information we have registered and use, including where they come from and how we use them. The customer is entitled to know how long we store the information and who receives information about the customer and to the extent that we pass on personal information.

If our data is incorrect, incomplete or irrelevant, customer is entitled to have the information corrected or deleted with the restrictions contained in applicable law or rights to process data.

If the customer believes, that the information we have recorded about the customer, is incorrect or has objected to our use of the information, the customer may require that we limit the use of the information for storage. However, current legislation or the legitimate interests of ATRIUM may require that we retain the right to store the customer's data.

If we use information based on the customer's consent or agreement and the processing of the information is automated, the customer is entitled to receive a copy of the information provided by the customer in an electronic machine-readable format.

In some cases, the customer is entitled to object to our processing of the customer's personal information.

The customer has the right to object to our use of his personal information for direct marketing purposes.

Finally, as a customer, you can revoke any consent at any time. Note, that if the customer revokes consent, we may not be able to offer financial advice. Note, that we may continue to use the customer's personal information, for example to comply with an agreement, we have entered into with the customer or if we have a statutory duty.

Data manager and contact information

Data manager is:

ATRIUM Partners A / S
Strandvejen 102B, 2nd floor
2900 Hellerup
CVR Number: 27 36 11 10

ATRIUM has appointed the company's compliance officer as responsible for personal data. If you have questions about how ATRIUM processes your information or has other questions related to this, you can contact the compliance officer at compliance@atriumpartners.dk