

DATA PROTECTION POLICY

November 2023

This data protection policy ("Policy") describes how The Trade Compliance House ApS (Alias: Lykke Schmidt ApS), (Trade Compliance House), as data controller, collects and processes your personal information in connection with your use of our website and our services and in connection with the fulfillment of agreements for the delivery of services and products as well as the resolution of tasks.

Trade Compliance House has issued this Policy because we are determined to fulfill our obligations regarding the processing of personal data in accordance with applicable Danish law and EU legislation in the area ("GDPR"). The purpose of our Policy is to provide you with information about our processing of your personal data and information about how we ensure compliance with the GDPR.

1 PROCESSING OF PERSONAL DATA

Trade Compliance House receives personally identifiable information in connection with its work, including when performing tasks and delivering services and products.

Trade Compliance House processes this information according to written internal instructions that ensure confidentiality and that the processing takes place in accordance with both the EU data protection regulation and the data protection act.

2 CONTACT INFORMATION

Trade Compliance House Consulting ApS (cvr.nr. 41144815), Bredgade 3, 4., 1260 København K, Phone +45 4040 1681, is the data controller for the personal data that is received and processed.

Questions regarding the processing of personal data should be addressed to info@LykkeSchmidt.com.

3 PURPOSE

Processing of personal information takes place in order to be able to perform the tasks and deliver the services or products Trade Compliance House has undertaken or is required to do according to applicable law, or to protect Trade Compliance House's legitimate interests in asserting, clarifying or defending its legal claims.



Social security number and sensitive personal data such as health information, trade union affiliation, religious, sexual orientation etc. are processed in accordance with the requirements of the Data Protection Act.

The Law on Money Laundering authorizes the processing of personal data in its area.

Trade Compliance House only processes personally identifiable information to the extent that it is necessary in relation to the execution of the assignments and delivery of the services that Trade Compliance House has undertaken.

Information that is processed mainly comes from our customers, but can also come from counterparties, other parties, courts, public authorities and open public registers, etc. Trade Compliance House continuously ensures that only correct, updated information is processed.

4 FINANCE AND CASE MANAGEMENT

Trade Compliance House uses the E-conomic accounting system, and a data processing agreement has been entered into with the suppliers. Personally identifiable information is passed on for the purpose of using the systems.

All material, including inquiries regarding the individual cases, is archived electronically and in some cases also physically on the cases.

5 TRANSFER OF PERSONALLY IDENTIFIABLE INFORMATION

When processing Trade Compliance House's assignment, it may be necessary to transfer personally identifiable information to public authorities and other parties in the case. It may also be necessary to transfer information authorized by law, e.g. Money Laundering Act and Accounting Act.

Finally, if a task includes services or deliveries from Lykke Schmidt Advokatanpartsselskab (Cvr. no. 43772694), Trade Compliance House will pass on personal data to Trade Compliance House if it is relevant or required for Trade Compliance House to fulfill its/their obligations in according to the assignment, internal safety regulations and/or applicable law.

By engaging Trade Compliance House or placing an order, the client consents to Trade Compliance House sharing and transferring personal data as described above.

Personally identifiable information is deleted no later than 10 years after the completion of the assignment. The period has been determined taking into account Trade Compliance House's obligations under the Bookkeeping Act and the Money Laundering Act, as well as the possibility of dealing with cases of liability for damages.



Personal information is not passed on for marketing purposes and is not transferred to countries outside the EU/EEA, unless a separate agreement has been entered into.

6 THE DATA SUBJECT'S RIGHTS

6.1 Right of access

Upon request, Trade Compliance House grants a registered person the right to access the personal information it processes, if the information is not covered by Trade Compliance House's duty of confidentiality.

6.2 Right of rectification

Incorrect, objective data processed about a data subject may be required to be rectified by the data subject. The registered person has the right to have any illegally processed information deleted at Trade Compliance House.

6.3 Data portability

A registered person has the right to data portability , by receiving the information that the person has given to Trade Compliance House in a common machine-readable format.

6.4 Right to object

In certain cases, the data subject can object to the processing of his personal data. If the data subject has the right to have the processing restricted, Trade Compliance House will only process the information, except for storage, with the consent of the data subject or for the purpose of establishing, asserting or defending legal claims, or to protect a person or important societal interests.

6.5 Right to be forgotten

If the personal data is no longer necessary to fulfill the purpose of collection, e.g. if the legal basis ceases, or if the data subject's legitimate interest in the data being deleted is greater than Trade Compliance House's interest in the data being stored, the data subject can demand that the data be deleted. Regarding the data subject's rights, please refer to the Norwegian Data Protection Authority's guidance on the data subject's rights, which can be found at www.datatilsynet.dk.

7 COMPLAINT TO THE DANISH DATA PROTECTION AUTHORITY

The registered person has the right to complain to the Data Protection Authority about the way Trade Compliance House processes the person's personal data . The Danish Data Protection Authority's contact information can be found at www.datatilsynet.dk.