# Privacy policy (information to be provided)

Your privacy is important to the New Carlsberg Foundation. To safeguard your privacy we have established the following policy for how the New Carlsberg Foundation ('we' or 'us') handles your personal data.

In the following, the European Union's General Data Protection Regulation will be referred to as the 'GDPR'

In the following, the Danish Data Protection Act will be referred to as the 'DDPA'.

# The New Carlsberg Foundation is the data controller

The data controller is the New Carlsberg Foundation, VAT DK54065418, located at Brolæggerstræde 5, 1211 Copenhagen K, Denmark. If you wish to invoke your rights – as described below – or if you have any questions, you are welcome to contact Nina Schmidt-Petersen at tel .+45 4422 5880 or by email: nsp@ncf.dk.

# Our processing activities

Below you can read more about the categories of data we process, for what purposes and on what legal basis.

# **Grant applicants**

The New Carlsberg Foundation collects and processes your personal data – including your application – for the purpose of:

- assessing whether the New Carlsberg Foundation is going to approve a donation for you or your project
- announcing and publicizing your project including personal data such as your name and, possibly, your job title on our website if we approve your application for a donation
- sharing the submitted application, in its entirety, with professionals who are part of the New Carlsberg Foundation or who are consulted in connection with our processing of your application
- further processing for archival purpose in the interest of society at large, for the purpose of scientific or historical research and for statistical purposes
- inviting you to particularly relevant professional events and the facilitation of such events (see also the section 'Managing events' below)
- budgeting and accounts

The New Carlsberg Foundation provides funding for the arts, art research, the publication of books, research trips and similar purposes. You can read more about the scope of the foundation's work, including what the foundation supports and does not support, at this website: <a href="https://www.ny-carlsbergfondet.dk/en/application/what-we-support">https://www.ny-carlsbergfondet.dk/en/application/what-we-support</a>

## Categories of personal data

We process general personal data, including basic data such as your name, address, email and telephone number as well as project information and description, project budget, banking information and the project evaluation.

The New Carlsberg Foundation has no need to process sensitive personal data. We therefore ask you not to provide us with such information.

# Legal basis

The New Carlsberg Foundation processes your personal data based on your consent, cf. the DDPA's art. 9 (2) in order to process your application, including determining whether to approve funding for your project.

If you are awarded a grant the New Carlsberg Foundation will process – including publicizing – your general personal data for the purpose of legitimate interests pertaining to announcing what the foundation supports and publicizing your project, cf. the GDPR's art. 6 (1-f) and the GDPR's art. 6 (1-b).

If you are awarded a grant the New Carlsberg Foundation may further use your personal data to invite you to professional events, cf. the GDPR's art. 6 (1, sec. f). You can read more about this in the following sections.

The New Carlsberg Foundation processes personal data if it is necessary for compliance with a legal obligation to which the New Carlsberg Foundation is subject, cf. the GDPR's art. 6 (1-c).

#### Your consent is required

You are required to provide your consent to the processing of certain data in order to have your application processed and reviewed. If you do not give your consent to this data processing we will not be able to process your application for funding.

If you receive a donation from us you should be aware that certain general information may be made public without your consent. Thus, we may publicize basic personal data such as your name, grant amount and a description of the project.

# About your consent - withdrawing your consent

When you submit your application we request your consent for processing your personal data for the purposes described above. In the consent form we inform you about the legal basis and about our legitimate interest in processing your personal data. When you give your consent you also give us permission to share the submitted application, in its entirety, with professionals who are part of the New Carlsberg Foundation or who are consulted in connection with our processing of your application. Your consent is voluntary, and you can withdraw it at any time by contacting us, using the contact information above. If you do not give your consent, or if you withdraw it, your application will be declined.

If you choose to withdraw your consent this will not affect the legality of our processing of your personal data based on your previously given consent up until the time of your withdrawal. Thus, if you withdraw your consent, such withdrawal will only take effect from the time it is stated. Withdrawing your consent will also not affect the processing of personal data that are processed on a different legal basis.

#### Storage and erasure

When you have given your consent it will remain valid until we have processed your application. Below, you can read more about your rights when you have given your consent for us to process your personal data, as described above.

If you are awarded a grant your application will be kept on file as long as the New Carlsberg Foundation deems it necessary in order that we may include the data in the New Carlsberg Foundation's internal records of purposes and projects that have received funding.

The New Carlsberg Foundation's assessment of how long it will be necessary to keep your information on file will be based on our need to see what projects have received funding, including the ability to differentiate the support provided by the New Carlsberg Foundation in order to ensure a balanced distribution of funds among different areas.

In any circumstance, the data will be kept on file at least until the completion of the project and for up to five years plus the current accounting year after the completion of the project.

When we award a grant for a project we will announce and publicize the project, including on our website. This may include the publicizing of basic personal data, such as your name, the grant amount and a project description. The purpose of storing and publicizing the data in this manner is to publicize what the foundation supports and to publicize your project, cf. the GDPR's arts. 6 (1-f) and 6 (1-b).

If the New Carlsberg Foundation declines a grant application, information about the applicant's name, email address, a summary of the application, project title and, if relevant, the name of the organization you applied on behalf of will be preserved in the New Carlsberg Foundation's internal records of received applications. This is done to enable the New Carlsberg Foundation to differentiate its funding. Other data will be erased if we decide not to fund your project.

# Who has access to your data?

Your data may be shared, including being disclosed and made available, internally within the New Carlsberg Foundation. In addition, we may also disclose or make your personal data available to the following recipients:

- The New Carlsberg Foundation discloses personal data to public authorities in accordance with the legal obligations or rights of the New Carlsberg Foundations in accordance with other legislation or if it is required by another authority.
- The New Carlsberg Foundation may share your data with external consultants, professionals and similar for the purpose of assessing your application and project.
- Accountant and, possibly, lawyer and other advisors.
- · Bookkeeping staff.
- IT providers in connection with the operation and maintenance of IT systems as well as user administration and support.

Your data is stored within the EU (European Union) and the European Economic Area ('EEA'). If we transfer your data to data processers in third countries this occurs within the framework of the GDPR safeguarding your privacy.

# **Managing events**

# Purpose

The New Carlsberg Foundation collects and processes your personal data with the purpose of handling professional events, including handling participants, sending out invitations and lists of participants and facilitating and organizing the event.

# Categories of personal data

We process general personal data, including your name, title, organization, job title, telephone number and email address.

# Legal basis

When we invite you to attend a professional event that we expect will be of interest to you, we do so based on our legitimate interest, cf. the GDPR's art. 6 (1-f). Note that the event is not intended, in any way, to pursue any commercial activity. You are free, at any time, to decline the receipt of future invitations by replying to the invitation by email with the message 'unsubscribe'.

If you choose to attend the event, the processing is necessary for us to pursue a legitimate interest in being able to manage and operate the event, cf. the GDPR's art. 6 (1-f and 1-a).

# Storage duration

We will continue to store your data as long as we have a legitimate need to be able to process them. We further consider whether there are any specific conditions that call for shorter or longer duration of

storage.

#### Recipients

As a general rule, we do not share your personal data with others. However, we do share the list of participants with the other participants registered for the event. The list of participants will only feature the following personal data: name, email address, organization and job title. If you do not wish for your personal data to be included in the list of participants, please contact us. You can read more about your rights with regard to our processing of your personal data in subsequent sections of this Privacy Policy document.

# Job recruitment

#### Purpose

The purpose of our processing of your personal data is to fill vacant or future positions at the New Carlsberg Foundation.

#### Categories of personal data

We process both the basic personal data that you provide in your job application (for example your name, address, email, job application and resumé/CV) as well as any data that might emerge in connection with the recruitment process, for example through testing, from third parties, such as a reference person, or similar.

As a general rule, the New Carlsberg Foundation has no need to process confidential (for example your CPR number (official Danish ID number)) or sensitive personal data. We therefore ask you not to provide us with such information.

#### Legal basis

The New Carlsberg Foundation's processing of your personal data happens in accordance with the GDPR's art. 6 (1-f), as we have a legitimate interest in being able to assess candidates and fill vacant positions with suitable candidates.

If the New Carlsberg Foundation receives data that you have actively volunteered to provide to the New Carlsberg Foundation, such data will be regarded as being received with your (the applicant's) consent, cf. the DDPA's art. 12 (3).

References from, for example, former employers will only happen with your consent, cf. the DDPA's art. 12 (3).

The New Carlsberg Foundation is further entitled to process data under the GDPR's art. 6 (1-b), as this processing is necessary for our ability to enter into an employment contract with you.

# Duration of storage

We process your data until the recruitment process has been completed. In any circumstance, however, we delete your data no later than three months after receiving your application, unless we determine that specific circumstances necessitate shorter or longer storage, or if you give us your consent to store your data for longer, for example in connection with recruitment for other current or future positions.

# Recipients

We treat all your personal data as confidential; thus, only employees who are involved in the recruitment process will have access to your data. We do not generally share your personal data with third parties, but may in some cases provide them to third parties such as test providers, recruitment agencies or similar who provide services to us in connection with the recruitment process. When that is the case, the New Carlsberg Foundation makes sure to enter into the necessary agreements, in part in order to ensure that your personal data are handled securely and confidentially in accordance with

the obligations specified in the GDPR.

## The source(s) of your personal data

In addition to the data you type in yourself, we may, in connection with the recruitment process, conduct a search for relevant publicly available information online, for example from LinkedIn, Facebook and other social media.

#### **Security**

To safeguard your data we maintain high security standards. To that end, we have a number of internal procedures and policies in place to ensure that we live up to our high security standards.

# Your rights

# Right to access data

You have the right to access the personal data we have collected about you.

# Right to have data rectified

You have the right to request having your personal data rectified if they are incorrect, including the right to complete incomplete data.

When you have applied for funding via the New Carlsberg Foundation's application system you may rectify your personal data yourself.

#### Right to have data erased

In certain cases you have the right to have the personal data about you that we process erased. If you request the erasure of personal data related to an active application you should note that we will then not be able to process your application. The same applies if you withdraw your consent.

# Right to restrict data processing

You have the right to request that we restrict the processing of your personal data. The New Carlsberg Foundation does not use automated processing of personal data (profiling).

# Right to object to our processing of your data

You have the right to object to a use of your personal data that is based on the New Carlsberg Foundation's legitimate interests. We will not continue to use your personal data unless we can demonstrate a legitimate reason for their use that overrules your interests and rights and/or point to legal requirements.

You also have the right to object to our processing of your personal data based on the rule about the balancing of interests.

# Right to transfer data

You can also contact us if you would like to inquire about your options for data portability.

#### Right to withdraw your consent

If you have given your consent to data processing you may, at any time, withdraw your consent by contacting the New Carlsberg Foundation.

#### **Complaint**

If you wish to lodge a complaint over our processing of personal data you can contact us at nsp@ncf.dk. You may also lodge a complaint with the Danish Data Protection Agency (Datatilsynet), Borgergade 28, 5, 1300 Copenhagen K, telephone +45 3319 3200, email: dt@datatilsynet.dk.

## Updating our data protection policy

Because we care about safeguarding your personal data, this data protection policy may be subject to updates.

7 March 2019, version 2.0.