

Personal data policy  
Logic Group A/S

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## **1 Introduction**

- 1.1 Logic Group A/S is committed to processing personal data in an orderly and secure manner to protect personal data and the rights and integrity of the persons concerned.
- 1.2 This Privacy policy (the "policy") describes how Logic Group A/S processes and protects personal data. The policy also describes measures implemented by Logic Group A/S to ensure compliance with existing data protection legislation.

## **2 Personal data**

- 2.1 The term personal data covers all information relating to an identified or identifiable natural person (the "data subject"). Such information may include name, contact information, payroll information, etc.
- 2.2 Logic Group A/S maintains a record of the personal data processed by logic Group A/s.

## **3 General principles**

- 3.1 In order to ensure a high standard of processing of personal data, logic Group A/s will abide by the following general principles relating to the processing of personal data by Logic Group A/S

(a) Legality and fairness

Personal data are processed legally and fairly and in accordance with the rights of data subjects.

(b) Purpose limitation

Personal data is only collected for certain and legitimate purposes. Furthermore, personal data will be used solely for the purposes for which the information was originally collected.

(c) Transparency

Where personal data are collected from data subjects or through third parties, the data subjects concerned will be provided with the information required by applicable law. In addition, the data subjects are always entitled to request information about the personal data collected about them.

(d) Data minimization

Any personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

(e) Accuracy

All processed personal data must be correct and, where necessary, kept up to date.

(f) Storage restriction

Personal data are processed only in a form that allows identification of the Registered, as long as necessary for the purposes for which the personal data have been collected and processed. Mandatory procedures and policies ensure that personal data is erased correctly.

(g) Confidentiality

Any personal data processed by the Logic Group A/S shall be considered as confidential information. Logic Group A/S will ensure confidentiality by making employees aware of the importance of personal information and training staff in how personal data may be processed.

**4 High safety standards**

4.1 Logic Group A/S will ensure technical and organisational security measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage, misuse or other processing in violation with applicable law.

4.2 Logic Group A/S has also implemented an IT security policy.

**5 Transfer of data and use of Data processors**

5.1 Logic Group A/S transfers personal data only to a country that is not regulated by the EU/ EØS's data protection rules to the extent that they Registered Have consented to such transfer or if other legal basis for the transfer of the data can be identified.

5.2 Logic Group A/S also sets a high standard of obligations for suppliers in relation to the processing of personal data. Logic Group A/S therefore ensures that necessary data processing agreements are in place with the Data processors and/or sub-processors used.

**6 Data protection incidents (privacy breaches)**

6.1 If Logic Group A/S identifies or is informed that the security of the processing of personal data has been compromised or is likely to be compromised or that there has been any other unauthorized or unintentional disclosure of or access to personal data, Logic Group A/S immediately informs the data subjects concerned.

Logic Group A/S is responsible for maintaining specific procedures for handling any personal data breach, including how notification will be made to the Data Controller and how relevant service Continuity plans will be implemented.

**7 Logic Group A/S Data Protection Officer**

7.1 To ensure compliance with the data Protection Regulation, Logic Group A/S has appointed a data protection officer.

7.2 The data protection officer monitors compliance with data protection rules, performs the training of Logic Group A/S Employees (see section 8), initiates audits (see below under section 9) and addresses all issues related to personal data.

## **8 Training**

8.1 Logic Group A/S is committed to conducting the training of relevant employees regarding applicable data protection rules and this policy.

8.2 New employees will receive an introduction to data protection and this policy if relevant to their position. Training is carried out on a regular basis and participation in training is obligatory.

## **9 Review**

9.1 Logic Group A/s has established processes for regular auditing to manage and mitigate the risks of Logic Group A/S's processing of personal data.