



Privacy policy

April 2025

The purpose of this privacy policy is to describe how P+, Pensionskassen for Akademikere ("P+") accesses and processes personal data which is done in accordance with the legislation in force from time to time.

1. P+ is the data controller

P+ is the data controller for the processing of the personal data we receive about you as a member.

Contact information

P+, Pensionskassen for Akademikere
Dirch Passers Allé 76
2000 Frederiksberg
Denmark

kontakt@pplus.dk

+45 3818 8700

Contact information on our DPO

Sara Løchte
dpo@pplus.dk

2. Purpose of processing personal data

We process personal data for the purpose of:

- Admission to P+.
- Setting up pension schemes.
- Changing pension schemes.
- Testing purposes related to development of the member system.
- Claims handling when processing loss of earning capacity or death.
- Payment of pension and insurance benefits.
- Advisory services and information.
- Development of member-targeted advisory services and information initiatives.
- Administration of pension schemes (e.g. adjustments) and member relationships.
- Communication and marketing.
- Internal education purposes.
- Rental of apartments.
- Holding annual general meetings and member meetings.
- Compliance with our legal obligations.
- If the member submits a report via P+'s whistleblower scheme.

3. Categories of personal data

We process below-mentioned categories of personal data and only when necessary, cf. section 2.

Non-personal data, e.g.:

- Name*.
- Address*.
- Phone number*.
- E-mail*.
- Civil registration number*.
- Passport or driver's license information, including personal photo*.
- Salary information*.
- Social circumstances*.
- Education*
- Family information (spouse/cohabitant/children).
- Information about your member relations with us*.
- Asset information.

In case of any discrepancy between the Danish text and the English translation, the Danish text shall prevail.

- Payment information*.
- Accounting information*.
- Information on foreign identity cards*.
- Audio recordings of advisory services conversations.
- Image materials and audio (related to holdings of general meetings and member meetings).
- System generated information about user behavior on P+'s website and behind login in Min pension and in P+'s app.
- System generated information about whether materials sent via the pension fund's communication platform, currently e-Boks, have been read.
- Personal data which the member may choose to provide in relation to a report under P+'s whistleblower scheme. The member may also choose to remain anonymous, in which case there will be no processing of the members personal data - only the submitted report. If, contrary to expectations, personal data on another member is provided in P+'s whistleblower scheme, P+ will process this data in accordance with this privacy policy.

Sensitive personal data, e.g.:

- Health information.

Information marked with a * is compulsory. It is not possible to set up or change a pension scheme if the pension fund does not have this information.

4. How the pension fund receives personal data

In general, the pension fund collects personal data directly from you or your employer.

Personal data may also be collected from:

- a) Publicly accessible registers.
- b) Public authorities.
- c) Hospitals, general practitioners, medical specialist etc.
- d) Banks.
- e) Other pension companies.
- f) The Danish Centre of Health & Insurance.
- g) Insurance brokers and insurance agents.

5. Legal basis for the processing of personal data

P+ is permitted to process personal data on one of the following legal bases under **Article 6(1) of the General Data Protection Regulation**:

- a) Where you have given your consent to processing personal data for one or more specific purposes, pursuant to **Article 6(1)(a)**.
- b) Where the processing is necessary for the performance of the pension agreement with you and in order to take steps at your request prior to the setting up of the pension agreement, pursuant to **Article 6(1)(b)**.
- c) Where the processing is necessary for P+ as data controller, or a third party to pursue legitimate interests, pursuant to **Article 6(1)(f)**. This applies to the following:
 - a. The processing and administration of personal data is necessary for marketing and communication purposes.
 - b. Where you have submitted personal data in a report to P+'s whistleblower scheme, data is processed for P+ or a potential third party to be able to pursue legitimate interests, including following up on serious matters that may potentially constitute criminal offences.
- d) Where the processing is necessary to comply with a legal obligation that lies with P+, pursuant to **Article 6(1)(c)**.
- e) Where the processing is necessary for the establishment, exercise of defence og legal claims, pursuant to **Article 6(1)(f)**.

Where processing is based on your consent, you are at any time entitled to withdraw that consent without affecting the lawfulness the processing based on consent before its withdrawal.

If you want to withdraw a consent, please contact P+ on kontakt@pplus.dk or +45 3818 8700.

6. If we need to disclose personal data

P+ only discloses personal data if the pension fund is entitled to do so in order to pursue purposes mentioned in section 2 above, if we are required to do so under legislation or if we have obtained your consent. Employees in P+ are subject to a duty of confidentiality regarding members' affairs and must not unlawfully disclose or release information that has come to their knowledge in connection with their work.

We may share your personal data with the following parties:

- a) Your employer where your pension scheme is set up through your employer.
- b) Public authorities and publicly accessible registers.
- c) Hospitals, general practitioners etc.
- d) Banks.
- e) Other pension companies.
- f) The Danish Centre of Health & Insurance.
- g) Suppliers and distributors with whom we cooperate.
- h) Other third parties who in connection with specific processing activities are entitled to receive the personal data - such as real estate agents, professional advisers (such as lawyers) and other relevant stakeholders.

7. Under what circumstances do we disclose your personal data outside the EU

In general, personal data is processed within the EU/EEA. P+ does not transfer personal data to countries outside the EU/EEA, and in general P+ does not allow processors to transfer personal data to countries outside the EU/EEA. However, transfers of personal data to third countries may occur, e.g. in connection with PensionInfo's use of sub-processors. Such transfers must be made in accordance with Chapter V of the General Data Protection Regulation.

8. Retention of personal data

In general, P+ retains personal data for the periods set out below and only for as long as necessary to pursue the purposes mentioned in section 2 above.

Description	Retention period
Membership information	5 years after termination of the membership. This is due to considerations under the Limitation Act and applies to admission and advisory services.
Offers where no insurance agreement is concluded	Up to 1 year after submission of the offer. This is due to the need to document the offer and the information that the offer was based on.
Information obtained in connection with customer due diligence requirements under the Anti-Money Laundering Act	5 years after the membership has been terminated. Under anti-money laundering legislation, P+ is required to retain all transactions for the same period.
Accounting records containing personal data	5 years from the end of the financial years to which the records relate.
Health information	5 years after the member has transitioned to retirement pension, or the customer relationship has been terminated.

If you have submitted personal data in a report to P+'s whistleblower scheme, we will assess whether the report falls within the scope of the whistleblower scheme. If so, we will retain the personal data for the duration of any investigation and for a specific period hereafter for documentation purposes. If your report does not fall within the scope of the whistleblower scheme, the report is deleted immediately.

9. Automated decision-making

P+ does not make use of automated decision-making.

10. Your rights

As a member, you have a number of rights under the General Data Protection Regulation in relation to our processing of data. If you want to exercise your rights, you must contact us.

Right of access

You have the right to access the data that we process about you as well as certain additional information.

Right to rectification

You have the right to have inaccurate data about yourself corrected.

Right to erasure

In special cases, you have the right to have data about yourself erased before the time of our ordinary general deletion occurs.

Right to restriction of processing

In certain cases, you have the right to have the processing of personal data restricted if you have the right to restriction of processing, we may in future only process the data, apart from storage, with your consent, or for the establishment, exercise or defence of legal claims, or to protect a person or important public interests.

Right to object

In certain cases, you have the right to object to our lawful processing of your personal data. You may also object to the processing of data for direct marketing purposes.

Right to transmit data (data portability)

In certain cases, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to have those personal data transmitted from one data controller to another without hindrance.

You can read more about your rights in the Danish Data Protection Agency's guidance available on their [website](#)

11. Right to complain

You have the right to lodge a complaint to the Danish Data Protection Agency if you are dissatisfied with the way in which P+ processes personal data. You can find the Danish Data Protection Agency's contact details [here](#)

These guidelines take effect on 25 May 2018.

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P+

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