

Privacy policy

April 2025

This policy outlines how P+, Pensionskassen for Akademikere ("P+") accesses and processes personal data which is done in compliance with the legislation in force at any time.

1. P+ is the data controller

P+ is responsible for the processing of your personal data related to your membership of the pension fund.

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.
- Handling of claims in the event of loss of the ability to work or death.
- Payment of pension and insurance benefits.
- Advisory services and information.
- Development of member-oriented advisory services and information measures.
- Administration of pension schemes (e.g. adjustments) and membership conditions.
- Communication and marketing.
- Internal education purposes.
- Rental of apartments.
- Holding of general meetings and member meetings.
- Compliance with our legal obligations.
- If the member submits a report to P+'s whistleblower scheme.

3. Categories of personal data

We process below-mentioned categories of personal data and only, if necessary, cf. item 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 conditions*.
- Education*
- Family relationship (spouse/cohabitant/children).
- Information about your member relations with us*.
- Financial information.
- Payment information*.

- Accounting information*.
- Information about foreign identity cards*.
- Audio recordings of advisory services conversations.
- Visual materials and sound (relating to holdings of general meetings and member meetings).
- System generated information about user behavior on P+'s website and behind login on 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 to P+'s whistleblower scheme. The member may also choose to be anonymous and in that case there will not be any processing of the member's 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 compliance with the present personal data 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 obtains personal data directly from you or your employer.

Personal data can also be obtained 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. The legal basis for processing personal data

P+ is allowed to process personal data according to the following legal bases of the General Data Protection Regulation's article 6 (1) :

- a) Your consent to processing personal data for one or several purposes, cf. para (a).
- b) The processing is necessary in order to be able to comply with the pension agreement with you and to be able to complete pre-contractual measures at your request prior to the setting up of the pension agreement, cf. litra (b).
- c) The processing is necessary in order for P+ as the data controller or a third party to pursue legitimate interests, cf. litra (f). This applies to the following:
 - a. The processing and administration of personal data is necessary in order for P+ to conduct marketing and communication.
 - b. If you have forwarded personal data in a report to P+'s whistleblower scheme, data is processed in order for P+ or a potential third party to be able to pursue a legitimate interest, including follow-up on serious potentially criminal matters.
- d) The processing is necessary in order to comply with a legal obligation that lies with P+, cf. litra (d).
- e) The processing is necessary in order for legal claims to be determined, enforced or justified, cf. litra (f).

When processing is based on your consent, you are at any time entitled to withdraw the consent without this affecting the legitimacy of the processing of data based on the consent prior to the withdrawal.

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

6. Disclosure of personal data

P+ only discloses personal data if the pension fund is entitled to in order to pursue purposes, cf. item 2, is obliged to according to legislation or has received your consent. Employees in P+ are subject to confidentiality with respect to members' personal data and must not unfoundedly disclose or hand over information which has come to their knowledge in connection with their job.

We are allowed to disclose your personal data to:

- a) Your employer when 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 agents that we cooperate with.
- h) Other third parties who in relation to handling of actual activities are entitled to receive the personal data – such as real estate agents, professional advisors, e.g. attorneys and other relevant stakeholders.

7. Under which 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 that data processors transfer personal data to countries outside the EU/EEA. However, transfers of personal data to third countries may occur, e.g. in relation to PensionInfo's use of sub-processors. Such transfers must be performed according to the General Data Protection Regulation's chapter V.

8. Storage of personal data

In general, P+ stores personal data in below-mentioned periods and only for as long as it is necessary, cf. item 2.

Description	Storage period
Membership information	5 years after termination of the membership. The reason is the consideration of the rules in the Statute of limitations and applies to information obtained in relation to setting up pension schemes and advisory services.
Offers where no insurance agreement is concluded	Up to 1 year after submission of the offer. The reason is to be able to document the offer and the information that the offer was based on.
Information obtained to comply with requirements of the AML Act.	5 years after the member relations have been terminated. According to the AML Act, P+ is obliged to store all transactions in this same period.
Accounting records including personal data	5 years from the end of the accounting year that the material relates to. The requirements appear from the accounting legislation.
Health information	5 years after the member has transitioned to retirement pension, or the member relations have been terminated.

If you have provided 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 store 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 related to the pension fund's processing of data according to the General Data Protection Regulation. If you want to make use of your rights, you must contact us.

Right of access

You can obtain access to the personal data held about you.

Right to rectification

You can ask for incorrect, inaccurate or incomplete personal data to be corrected.

Right to erasure

You can request that personal data be erased when it is no longer needed or if processing it is unlawful.

Right to restriction of processing

In certain cases, you can request the restriction of P+ processing of your data. In this case, the pension fund can only process data - except from storage - with your consent or for the purpose of legal claims being determined, enforced or justified or to protect a person or important public interests.

Right to object

In certain cases, you can object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.

Right to data portability

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

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

11. Right to complain

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

These guidelines take effect on 25 May 2018.

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P+

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