



Privacy policy

March 2022

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 (Data Protection Officer):

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 benefits.
- Advisory services.
- Administration of pension schemes (e.g. adjustments).
- Communication and marketing.
- Rental of apartments.
- Holdings of general meetings and member meetings.
- Compliance with legal obligations.
- Handling of submission of a report to P+'s whistleblower scheme from a member.

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 photo*.
- Salary information*.
- Social circumstances*.
- Family relationship (spouse/cohabitant/children).
- Information about your member relations with P+*.
- Financial information.
- Payment information*.
- Accounting information*.

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

- Information about foreign identity cards*.
- Visual materials (relating to holdings of general meetings and member meetings).
- System generated information about whether materials sent via the pension fund's communication platform, at present e-Boks, have been read.
- Personal data which the member has chosen to state related to a notification to P+'s whistleblower scheme. A notification can also be anonymous and in that case there will not be any processing of personal data, only the filed notification. If, contrary to expectations, personal data on another member is stated 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 of your personal data

P+ is allowed to process personal data according to the following legal basis:

- a) Your consent to processing personal data for one or several purposes.
- b) In order to be able to fulfil 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.
- c) The processing is necessary in order for the data controller or a third party to pursue legitimate interests.
 - a. The processing and administration of information in order for P+ to market our products and communicate.
 - b. If you have forwarded personal data in a report to P+'s whistleblower scheme, data is processed in order for the data controller or a potential third party to be able to pursue a legitimate interest, including follow-up on serious potential criminal circumstances.
- d) The processing of data is necessary in order to comply with the legal obligation that lies with P+.
- e) The processing of data is necessary in order for legal claims to be determined, enforced or justified.

When the processing of data 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 your personal data

P+ only discloses your personal data if the pension fund is entitled to, 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 with whom we cooperate.
- 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. Transfer of 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
Member 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.
Pension offers that are not accepted	Up to 1 year after submission of the offer. The reason is the consideration of being able to document the offer and the information that the offer was based on.
Personal data obtained to comply with 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 been transferred to retirement pension, or the member relations have been terminated.

If you have forwarded personal data in a report to P+'s whistleblower scheme, the pension fund assesses whether the report is subject to the scope of the whistleblower scheme. If so, the pension fund stores the personal data for the period that a potential investigation is going on and in a following specified period for documentation requirements. If your report is not subject to the scope of the whistleblower scheme, the report is deleted immediately.

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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 are entitled to gain access to the data P+ processes about you as well as a number of other information.

Right to rectification

You are entitled to have incorrect information about you rectified.

Right to delete

In certain cases, you are entitled to have personal data deleted before the ordinary, general deadline for deletion.

Right to restricted processing

In certain cases, you are entitled to restrict P+'s 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 are entitled to object to the pension fund's legal processing of your personal data. You are also entitled to object to processing of your personal data for direct marketing.

Right to data portability

In certain cases, you are entitled to receive 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 discontent 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.

Last revised on 30 March 2022.



P+

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