

# Privacy notification – SOS International (Customers, suppliers and other)

## 1 PROCESSING OF PERSONAL DATA

SOS International (“SOS”) collects and processes personal data about you, since you are employed by one of our customers or a supplier, with whom we cooperate, or you have contacted SOS for other reasons e.g. if you use our website. The purpose of the processing of information about you, is to be able to cooperate and handle our common interests. We are acting as the data controller when we process your personal data.

## 2 WHAT INFORMATION ABOUT YOU DO WE PROCESS?

SOS processes information about you which we receive from you, or from another person related to you. The information we process may vary, but it will be regular personal data, such as:

- (i) Contact details including name, address, telephone number, e-mail address and profession/title
- (ii) Session cookies and persistent cookies – read more under “Cookie information” <https://www.sos.eu/en/who-we-are/compliance/>
- (iii) Video footage of SOS’ entrances
- (iv) Information about use of SOS’ IT-systems including recording of activity when logging in through SOS Citrix solution (relevant for SOS consultants)

Please see section 7 below about phone recordings.

## 3 HOW WILL WE USE THE INFORMATION ABOUT YOU?

The purpose of processing information about you is to:

- (i) Send newsletters
- (ii) Handle contractual relations
- (iii) Conduct support
- (iv) Manage general customer and supplier handling
- (v) Handle your questions/requests
- (vi) Make reports/statistics
- (vii) Ensure the security of our employees, to prevent criminal activities on our premises and to prevent unauthorised persons from gaining access to SOS premises
- (viii) Handle suspicions of IT-security incidents or personal data breach

SOS only discloses your personal data to external parties if necessary and if there is a legal basis for this. This can be public authorities, private companies or individuals, foundations,

associations, etc. depending on the nature of relationship. In addition, we leave information to our data processors (such as IT vendors).

Internally, only those of our employees who have a work-related need to see your personal data have access to it.

#### **4 LEGAL BASIS**

SOS process information about you based on the General Data Protection Regulation art. 6(1) (b), (c), and (f). SOS' legitimate interests justifying the treatment pursuant to art. 6 (1)(f) is to be able to handle your request, to handle any contractual obligations towards our customers and suppliers or to be capable of addressing the handling of any litigation between SOS and you, is in particular to be able to handle complaints, take care of our financial interests and quality assurance.

#### **5 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

SOS may exchange information with suppliers and other parties in countries outside EU/EEA if relevant for the specific customer or supplier, but only if it is permitted under data protection legislation and given that all relevant conditions are fulfilled. SOS will only exchange such information if that it is necessary for handling the specific enquiry.

These countries might have different rules regarding data protection than in the EU/EEA.

When the transfer of personal data is made to countries outside the EU/EEA, where the European Commission has not decided that the country ensures an adequate level of data protection, the transfer is conducted based on standard data protection clauses adopted by the European Commission or for the performance of a contract, art. 49(1)(a) and (b).

The transfers are appropriately safeguarded as described here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)

#### **6 HOW LONG DO WE PROCES YOUR INFORMATION?**

We process information about you for as long as necessary in order to achieve the purpose for which it was collected. We do not store the personal data in a manner, which enables identification, for a period which is longer than necessary for the purpose for which the personal data is legitimately processed.

#### **7 ESPECIALLY REGARDING PHONE RECORDINGS**

SOS records phone conversations with the purpose of securing the quality of our work and for training purposes, or documenting agreements. The recording is based on a legal basis in GDPR art. 6 (1) (a), (b), and/or (f).

SOS' legitimate interests justifying the treatment pursuant to art. 6 (1) (f) is in particular to be able to handle complaints and document agreements entered into.

We are data controllers for the recording of phone conversations between you and SOS.

The recording can in some cases be submitted to our customers as insurance companies for the end-users or to other third parties (e.g. public authorities), if SOS is legally entitled or obliged hereto.

The recordings are saved, as long as they are necessary for the purpose for which they are collected. As a main rule they are saved in 12 months, if they are recorded for the purpose of securing the quality of our work and for training purposes, and for 36 months if they are recorded for the purpose of documenting agreements.

You have the right to withdraw your consent. If you choose to do so, this will affect only our ability to process your information going forward. If you wish to withdraw your consent, please contact SOS by means of this link <http://www.sos.eu/en/for-you/self-service/#access-to-personal-data>

## **8 HOW DO WE PROTECT INFORMATION ABOUT YOU?**

SOS International is ISO-certified. SOS values quality and information security and thereby we ensure the protection of your personal data. This is underlined by our certifications, such as ISO-27001 (information security).

We use technical and organisational security measures to protect your personal data against unlawful loss, alteration, destruction or access by unauthorised persons and to ensure lawful processing. Our security procedures are regularly revised on the basis of developments in technology.

No surveillance on SOS premises takes place without signposting.

## **9 YOUR RIGHTS**

Under data protection legislation, you have the right to receive information about and object to the processing of information about you. Upon request, you also have the right to have information about you rectified, deleted or restricted if the information is wrong, misleading or unlawfully processed. In addition, you have the right to data portability.

In several situations, SOS International is entitled or required to store your personal data in accordance with legislation. This means that in many situations SOS International will not be able to meet your request for deletion before the legislations requirements for storage have expired.

If you wish to make use of your rights you can contact SOS via our webpage, <https://www.sos.eu/da/selvbetjening/>

You can lodge a complaint about our processing of information about you by contacting the Danish Protection Agency. You can find their contact information here: [www.datatilsynet.dk](http://www.datatilsynet.dk)

SOS has a Data Protection Officer, who can be contacted on the following email address:  
[dataprotectionofficer@sos.eu](mailto:dataprotectionofficer@sos.eu)

SOS International A/S, Nitvej 6, 2000 Frederiksberg, Denmark. Business registration number: 17013718. Phone number: +45 7010 5055.