

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

## 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 are employed at a supplier, with whom we cooperate, such as a consultant at company with whom SOS has entered into a consultancy agreement (“Consultancy Agreement”), or you have contacted SOS for other reasons, e.g., if you use our websites or visit our offices listed below in section 9.

SOS Group consists of many entities in the Nordic Countries and therefore there may be different data controllers depending on which entity you are in contact with. In this privacy notice the relevant data controllers are the entities listed on SOS website as linked to below.

The purpose of the processing of information about you is to be able to cooperate and handle our common interests. For consultant relationships, the purpose of the processing is to administrate the Consultancy Agreement and the matters related to the tasks performed under the Consultancy Agreement. 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, from external parties, or other persons, or entities related to you, such as the company or the supplier you are employed at. We also process personal data generated by SOS during the relationship.

The personal data processed by SOS varies depending on the specific situation, but as a starting point, we process regular personal data. Below we have listed the information we process in three relevant categories. Specifically for voice recordings, please see section 7 below.

1. When you visit SOS’ websites, we process the following information:

- (i) Session cookies and persistent cookies when visiting SOS’ websites – read more under “Cookie information” <https://www.sos.eu/en/who-we-are/compliance/#privacy-notice>
- (ii) In case you leave feedback to SOS via a feedback form available in our website, we process the following information: contact details, including name, address, telephone number, email address, case number and feedback written in the free text field

2. If you as a supplier, customer, or other third party, or visit our offices, we process the following information:

- (i) Contact details including name, address, telephone number, email address, profession/title and information about your reason for contact to SOS (e.g., when you are registering in the receptions)
- (ii) Video footage of SOS' entrances
- (iii) Location data in our mobility dispatching solutions if such solutions are used by you

3. If you are a consultant for SOS, the personal data processed by SOS varies depending on the specific situation, but there will be regular and sensitive personal data, such as:

- (iv) Contact details including name, address, telephone number, email address and profession/title (e.g., when you are registering in the receptions)
- (v) Date of birth or personal identification number, and your photo (e.g., copy of an ID card)
- (vi) Copy of a passport, including citizenship, in case you a medical consultant, where such documents are necessary in connection with booking of medical transports
- (vii) Central Business Register number, bank and invoicing information, as well as tax information, if the Consultancy Agreement is entered into with a company established in the form of a partnership
- (viii) Details of your qualifications, skills and experience, such as CV, information about relevant authorisations, certifications, education, courses, references, and any other public information, including information from social media, in case such is obtained in connection with entering into the Consultancy Agreement
- (ix) Information about criminal offences and/or credit rating, if such is relevant for the position and if such information has been collected, e.g., due to the position's character as a trusted position or otherwise containing great economic responsibility
- (x) Information about absences, days-off, and holidays
- (xi) Health data (e.g., information regarding disability) in exceptional cases and only if relevant
- (xii) Information about use of SOS' IT-systems, including recording of activity when login through SOS Citrix solution
- (xiii) Correspondence about various matters related to the tasks performed to SOS, including information about absences, incorrect payments etc.
- (xiv) Other information regarding the cooperation in relation to the agreed services delivered under the Consultancy Agreement

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

The purpose of processing information about you is, among other things, to be able to handle our common interests, maintain good partnership and ensure the physical security at our locations.

1. When you visit SOS' websites, the purpose of processing the above-mentioned information is, among others, to:

- (i) Make reports, statistics, and analyse activities

- (ii) Handle your questions/requests, in case you provide us feedback via the websites

2. If you are a supplier, customer, or other third party, or visit our offices, the purpose of processing the above-mentioned information is, among others, to:

- (i) Comply with our obligations as required by law or regulatory requirements
- (ii) Handle contractual relations and document agreements between you and SOS
- (iii) Manage general customer and supplier handling
- (iv) Handle your questions/requests
- (v) Send newsletters
- (vi) Conduct support
- (i) Ensure the security of our employees and consultants, to prevent criminal activities on our premises and to prevent unauthorised persons from gaining access to SOS premises
- (ii) Handle suspicions of IT-security incidents or personal data breach

3. If you are a consultant for SOS, the purpose of processing the above-mentioned information is, among others, to:

- (vii) Comply with our obligations as required by law or regulatory requirements
- (viii) Handle contractual relations and document agreements between you and SOS
- (ix) Handle your questions/requests
- (i) Document completion of courses relevant for the performance of the services under the Consultancy Agreement
- (ii) Log the use of SOS' IT systems, which is done for the purpose of carrying out technical trouble shooting and for control purposes

The above information may be shared internally with those involved and who have a work-related need to see your personal data and have access to it. The information shared is limited to what is required by each person to perform their work-related tasks.

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 (e.g., or insurance companies, when needed for the use of the insurances, the police, or tax authorities).

In addition, we collect and disclose information from and to suppliers with whom we work, including our data processors, such as IT suppliers and other business partners, as well as our subsidiaries.

Furthermore, we may disclose information to a legal advisor, if necessary.

#### **4 LEGAL BASIS**

When you visit SOS' websites, SOS will process the above-mentioned data, because SOS has a legitimate interest in registering and analysing traffic and statistics in relation to the use of our websites, or because we have a legitimate interest in processing your personal data to answer your request, cf. article 6(1)(f) of the EU General Data Protection Regulation (2016/679) ("GDPR") and article 6 (1)(a) when a consent is provided. Read more under "Cookie information" <https://www.sos.eu/en/who-we-are/compliance/>

If you are a supplier, customer, or other third party, or visit our offices, or are a consultant, SOS will process the above-mentioned data based on GDPR art. 6(1) (a), (b), (c), (e) and (f).

SOS' legitimate interests justifying the processing pursuant to art. 6 (1)(f) is to be able 1) to handle your request, 2) to handle any collaboration and/or contractual obligations towards our customers and suppliers, or 3) to be capable of addressing the handling of any dispute between SOS and you or the company that you represent. Further, we need to be able to handle complaints, take care of our financial interests and ensure quality assurance.

Where SOS processes sensitive data, the processing is carried out in accordance with the General Data Protection Regulation article 9 (2), litra a, b, e, and f, as well as in accordance with the applicable national legislation, depending on the nature of the processing.

Processing of national identification number of the consultant, if relevant, is carried out in accordance with art. 87 of the GDPR and the applicable national legislation, i.e., under the Danish Data Protection Act (databeskyttelsesloven) section 11 (2), the Norwegian Data Protection Act (personopplysningsloven) section 12, the Swedish Data Protection Act (dataskyddslagen) chapter 3 section 10, and the Finnish Data Protection Act (tietosuojalaki) section 29.

## **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 consultant, 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 it is necessary for handling the specific enquiry or matter. These countries might have different rules regarding data protection than in the EU/EEA.

Such transfers will only take place if appropriate safeguards are in place for the transfer such as:

- The country has been deemed by the Commission of the European Union to have an adequate level of protection of personal data, such as EU-U.S. Data Privacy Framework,
- The country has not been deemed by the Commission of the European Union to have an adequate level of protection of personal data, but we provide appropriate safeguards for the transfer using "Standard Contractual Clauses", as published by the Commission of the European Union,

- Any other legal basis, including the use of supplementary measures if deemed necessary, or if any of the derogations of article 49 of the GDPR are deemed adequate as a basis for the transfer.

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

We process information about you for as long as necessary 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.

For example, we will only store video footage as long as necessary and according to applicable national legislation.

Where it concerns the personal data of the consultants, we usually do not store personal data for a period longer than 5 years.

If any special circumstances require it, for example due to an ongoing dispute, SOS will keep your data stored for a longer period. However, personal data is not stored any longer than necessary to determine any legal claims.

## **7 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 specific purpose of a recording is informed, when calling the specific phoneline on which recordings take place. The recording is based on a legal basis in GDPR art. 6 (1) (a), (b), and/or (f).

SOS' legitimate interests justifying the processing 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 6 months in our Travelcare division. In our Mobility division they are as a main rule saved for 6 months, depending on the services delivered on the specific phonelines, where the purpose of the recording is also informed.

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 is ISO certified. At SOS, we emphasise strongly quality and information security and secure by that the protection of your personal data. Therefore, we are proud of our numerous accreditations and certifications, including ISO-27001 in information security and ISO-27701 (Privacy information management).

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

You have no obligation to share your personal data with SOS. In case you refrain from sharing the personal data that is necessary for the performance of the services, for instance under the Consultancy Agreement, this may affect the contractual relationship.

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/en/for-you/self-service/#access-to-personal-data>

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) If you wish to lodge a complaint in another country where SOS also operates (e.g., Sweden, Norway, Finland), you are entitled to do so.

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, Arne Jacobsens Alle 7, 2300 København S, Denmark. Business registration number: 17013718. Phone number: +45 7010 5055.

For any information about SOS' other locations and entities: <https://www.sos.eu/en/contact/>