



PRIVACY POLICY ORATO advokater P/S

ORATO advokater P/S (hereinafter “ORATO”) is subject to the Data Protection Act and the General Data Protection Regulation (“the Regulation”), which means, amongst other things, that we are obliged to inform you concerning the personal data ORATO processes about you, and the rights you have in this connection.

We have registered personal data about you. This is done for various reasons. In most cases, it is because you or the company you represent are clients of ours, but it may also be because your personal data has been provided to us for other reasons in connection with a case in which we are involved. We also register personal data about our business partners.

1. DATA CONTROLLER

ORATO advokater P/S, Gullandsstræde 5, 4000 Roskilde, CVR no. 40479295, is the data controller. If you have any questions concerning the processing of your personal data, you can contact Mette Bjørndal at +45 3126 3146 or mb@orato.dk.

2. PERSONAL DATA AND PURPOSE

In connection with ORATO’s assistance in your case or your other co-operation with ORATO, ORATO will to the necessary extent process and store a certain amount of data about you. This will typically consist of your contact information (name, address, e-mail address and telephone number), but depending on the nature and character of the case, it may also include one or more of the following:

- Civil registration number (CPR no.)
- Bank details
- Identification details (copy of health insurance card and driving licence, or other photo ID)
- Health information (illness history, e.g. in connection with termination of employment)
- Photographs
- Salary and other financial information
- Information on criminal offences
- Sensitive personal data, including data on race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and the processing of data relating to health, sexual relationships or sexual orientation
- Pay slips, employment contracts and resignations/terminations

All personal data are treated confidentially in accordance with the Code of Conduct of the Danish Bar and Law Society, the Administration of Justice Act, the Data Protection Act and the Regulation, and we will only process your personal data if we have a legitimate reason for doing so.

ORATO’s legal basis for processing the data arises from both the legitimate interest of ORATO in processing and storing client data, as defined in Article 6 (1) (f) of the Regulation, as well as the necessity of such data processing in order to be able to handle your case and thereby protect your interests or those of our clients.

In addition, the basis for processing arises from the fact that ORATO is obliged in a number of cases to collect and store health insurance cards and photographic ID in order to comply with the Act on Measures to Prevent Money Laundering and Financing of Terrorism, cf. Article 6 (1) (c) of the Regulation.



ORATO may also process data on civil registration numbers when this is necessary in order to ensure your unique identification, or if such processing is required in connection with communication with a public authority, cf. the rules of the Data Protection Act on the processing of civil registration numbers.

To the extent necessary in connection with the handling of your case and the protection of your interests, ORATO will process information on criminal offences pursuant to the rules of the Data Protection Act on the processing of criminal offences.

ORATO may process sensitive personal data to the extent necessary for the establishment or defence of legal claims, cf. Article 9 (2) (f) of the Regulation.

To the extent that you enter into co-operation with ORATO, ORATO has a legitimate interest to process necessary personal data about you, cf. Article 6 (1) (f) of the Regulation.

3. RECIPIENTS AND PROCESSORS OF PERSONAL DATA

Your personal data is processed exclusively by ORATO, unless other use follows from the nature of the request or the type of task.

It may be necessary to disclose your personal data to others. This will be done only to the extent necessary, based on the principle of data minimisation. Disclosure may for example be made to the courts and the parties to proceedings, including other lawyers, in connection with legal proceedings or the like, or to a bank and auditor in connection with company registration. It may also be necessary to disclose personal data to the public authorities in connection with the reimbursement of unemployment benefits.

Your civil registration number will be forwarded to the Court of Judicial Registration in connection with possible property registration, and to the Danish Business Authority in connection with company registration.

Any disclosure of personal data will take place within the framework of the rules to which we are subject, and in compliance with our statutory duty of confidentiality.

ORATO may disclose data relating to criminal offences if such disclosure is made in order to protect public or private interests, including your own interests, if your own interests clearly outweigh the need to respect confidentiality.

In addition, your personal data may be disclosed to your insurance company if ORATO is applying for insurance cover on your behalf, or to the Department of Civil Affairs and, where applicable, the Appeals Permission Board, if we are applying for legal aid on your behalf.

Your personal data may also be disclosed to our business partners and data processors if the disclosure is appropriate or necessary for our handling of your case.

Finally, personal data may be disclosed if ORATO is legally obliged to do so, for example to a public authority.

3.1. IN RELATION TO BANKRUPTCY AND COMPULSORY WINDING-UP PROCEEDINGS

In bankruptcy cases, the bankrupt company (the insolvent estate) is the data controller and the processing of the estate is carried out by ORATO, which is appointed liquidator of the estate. As part of the processing of the



insolvent estate, the following personal data will be processed, which also encompasses the insolvent estate's suppliers, customers, employees, etc.: contact details, salary, civil registration number and other identifying information, actions undertaken by the insolvent estate, relevant information on trade union membership and/or health, and any criminal record.

These personal data are processed in the context of the settlement of bankruptcy and compulsory winding-up proceedings.

ORATO processes and stores personal data pursuant to the relevant rules of the Bankruptcy Act and the Regulation, as set out in section 2, above, and otherwise in accordance with the provisions of this Privacy Policy.

3.2. IN RELATION TO THE RECRUITMENT OF STAFF

ORATO collects and processes the personal data of applicants in connection with recruitment and employment processes. This is done in order to assess the application and the applicant's qualifications in relation to the further processing. The legal basis is Article 6(1)(b) of the Regulation on entry into a contract. The collection of personal data takes place through the submission of the application, CV, transcripts, references and appendices, and via searches on social media and other publicly available platforms.

It is not necessary for ORATO to know an applicant's Danish civil registration number (CPR number), so please cross out this number on examination grade transcripts, etc., prior to submission.

ORATO may process the applicant's data in connection with possible participation in personality and talent tests. Participation in such tests is based on the consent of the applicant. All information is treated confidentially and is not passed on to other persons or companies. However, the information may be lawfully disclosed to companies in the course of the provision of their services. This applies, for example, to test providers.

4. ACCESS TO KNOWLEDGE, RECTIFICATION, DELETION, LIMITATION AND OBJECTIONS

You can request to be informed about the personal data ORATO has registered about you. If you so wish, ORATO will provide you with an electronic copy of the data collected.

You may at any time object to data about you being processed.

You also have the right to request that personal data registered about you be rectified or deleted, or that processing be limited.

If you object to the processing of your personal data by ORATO during the handling of the case, or request the deletion or limitation of data necessary for the handling of the case, as referred to in section 2, ORATO will no longer be able to handle the case. The case will then be concluded and billed.

There may be specific situations under the Regulation in which ORATO is not obliged to comply with the above rights.

If you wish to request (1) knowledge of, (2) rectification or deletion of the personal data registered about you at ORATO, or (3) limitation of the processing of the registered personal data, or (4) if you have any other objections, please contact Mette Bjørndal at mb@orato.dk or tel. +45 3126 3146.



5. DATA PORTABILITY

In certain circumstances, you have the right to have your personal data forwarded or transferred to another controller. If you wish to do so, please contact Mette Bjørndal, who will assess whether the necessary conditions have been met.

6. DURATION OF STORAGE

Your personal data will be stored securely for ten years from the date on which the case was archived, unless there are legitimate reasons to extend this period. This is to avoid conflicts of interest and to comply with the Bookkeeping Act and the Act on Measures to Prevent Money Laundering and Financing of Terrorism, which contain specific rules governing how long we must store your personal data. We will store your contact details for as long as we need to be able to get in touch with each other.

6.1. IN RELATION TO BANKRUPTCY AND COMPULSORY WINDING-UP PROCEEDINGS

The personal data recorded will be stored securely for five years from the end of the bankruptcy/compulsory winding-up proceedings, unless there are legitimate reasons to extend this period.

If our processing of your personal data is based on your consent, you are entitled to withdraw this consent at any time. If you withdraw your consent, we will no longer be entitled to process your data, unless another legal basis exists. We will then delete your data, which may mean that we can no longer handle your case.

6.2. IN RELATION TO THE RECRUITMENT OF STAFF

During the recruitment process, ORATO will store the applicant's data until the specific position is filled and the recruitment is complete. If you are hired by ORATO, this information will be included in your personnel file. If you are rejected for the position, ORATO will store your data for up to six months after the rejection, at which time the data will be deleted.

7. COMPLAINTS

You have the right to submit complaints concerning ORATO's processing of your personal data. Complaints may be submitted to the Danish Data Protection Agency, Borgergade 28, 5, 1300 Copenhagen K, dt@datatilsynet.dk. You can read more about this at: www.datatilsynet.dk.

8. QUESTIONS

If you have any questions concerning the processing of your personal data by ORATO, you are welcome to contact Mette Bjørndal at +45 3126 3146 or mb@orato.dk.

Applicable from 1 July 2019

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