

Data protection and privacy policy

Controller

Qmed Consulting Group
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DK 1150 Copenhagen
CVR-nr.: 30564278

(the "**Organization**")

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1. Introduction

- 1.1 This data protection and privacy policy (the “**Policy**”) describes how Qmed Consulting Group (“us”, “we” or “our”) collects and processes personal data relating to the purchase of services, membership, products or general use of our website.
- 1.2 As part of the recruiting processes, we collect and process personal data relating to job applicants. The Organization is committed to being transparent about how we collect and use personal data and meeting our data protection obligations. As a controller, we collect and process personal data about you in connection with handling your job application and in the recruiting process.
- 1.3 The Policy is prepared and made available to comply with the general data protection regulation (2016/679 of 27 April 2016) (the “**GDPR**”) and the rules included herein on information to be provided to you.

2. Types of personal data processed

- 2.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data: name, address, telephone number, email address, CV, profile picture, educational documents, references from former employers, information from social media that is publicly available and relevant, social security number, purchasing history, invoicing and bookkeeping data and documentation, account status (customer points, payments etc.).
- 2.2 We do not process sensitive personal data, i.e., the special categories of personal data, as defined in GDPR, Article 9(1).
- 2.3 When it is relevant, personal data is collected directly from you or from external sources:

Recruiter
Lawyer
Hospitals
Clients (manufacturers of Medical Devices, In-vitro Diagnostic Devices and Pharma)
Book keeper
- 2.4 If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by our updating of this Privacy Policy.

3. Purposes for processing the personal data

- 3.1 We only process personal data for legitimate purposes in accordance with the GDPR. Depending on the circumstances, the personal data is processed for the following purposes:
 - a) To process job applications and to recruit the relevant candidates.
 - b) To deliver products or services to a user, customer or member.

- c) To store personal data to comply with applicable legislation requirements such as bookkeeping acts.
- d) To send direct marketing to users, customers or members.
- e) To administrate and pay salaries.
- f) To communicate and exchange data with public authorities when required by law.
- g) To give support and service messages, including answering questions and complaints and send updates about our products and services.
- h) To improve our products, services or website.
- i) To facilitate a sales process.

4. Legal basis for processing personal data

4.1 We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a) The processing is necessary for compliance with applicable legislation, cf. the GDPR, article 6(1)(c), including any specific rules on the processing of personal data in the employment context as provided in GDPR, Article 88 such as section 12(1) of the Danish data protection law.
- b) The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, cf. the GDPR, article 6(1)(f).
- c) If we have asked for a consent for the processing of specific personal data, the legal basis for such personal data is a consent, cf. article 6(1)(a) of the GDPR, as the consent can always be withdrawn by contacting us via the contact details provided at the end of this Policy, and, if the consent is withdrawn, the personal data processed on the basis of consent is deleted, unless it can or must be processed, for example, in order to comply with legal obligations.
- d) The processing is necessary for the performance of a contract to which the data subject is party, cf. the GDPR, article 6(1)(b), the first indent.

5. Disclosure and transfer of personal data

5.1 We only pass on personal data to others when the law allows it or requires it, including when relevant and asked to do so by you or a data controller when applicable.

5.2 We transfer personal data to the following recipients from the EU/EEA:

- a) Data processors
- b) Tax authorities (for example in connection with accounting etc.)
- c) Banks (for example in connection with payments etc.)
- d) Collaborators

5.3 From time to time we use external companies as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless the

applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed on the basis of a data processor agreement in accordance with the requirements hereto under GDPR. Where the external parties are data controllers, the processing of personal data will be performed based on said external parties' own data privacy policy and legal basis which the external parties are obligated to inform about unless the applicable legislation allows otherwise.

- 5.4 We transfer personal data to countries or international organisations outside the EU/ EEA. Personal data is transferred to the following countries: Switzerland and Norway. Such transfers are based on the standard contractual clauses about data protection made or approved by the EU Commission and possibly approved by a national data protection agency, ensuring a sufficient level of protection
- 5.5 If you have any questions about our use of data processors, cooperation with other data controllers, including subsidiary companies, or transferring of data to third countries, please contact us for more information or documentation of our legal basis for said transfers.

6. Erasure and retention of personal data

- 6.1 We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We also retain personal data to the extent that it is an obligation from applicable law, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of personal data, please contact the email mentioned in the last section of this Policy.

6.2 For job applicants:

If you are offered a position and become an employee in the Organization, your personal data from the job application and data from the recruiting process are transferred/moved to our regular HR management system.

If you are not offered a position in the Organization, your personal data is erased after 6 months in accordance with applicable law. Notwithstanding the above, specific reasons related to employment law may necessitate the continuous processing of personal data. This may have different implications. For example, we may process the applications for a longer period to prove that there was no unlawful discrimination in the selection process when we consider this necessary. Similarly, it may be relevant to process the personal data for a limited period if a similar relevant position may become available during this period, or if another candidate opts out of the recruiting process.

7. Data subject rights

- 7.1 Data subjects have a number of rights that we can assist with. If a data subject wants to make use of his or her rights, he or she can contact us. The rights include the following:

- 7.1.1 The right of access: Data subjects have a right to ask for copies of the information that we process about them, including relevant additional information.

- 7.1.2 The right to rectification: Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.
- 7.1.3 The right to erasure: In certain circumstances data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.
- 7.1.4 The right to restrict processing: Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject has the right to have the processing of his or her personal data restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.
- 7.1.5 The right to object: Data subjects have, in certain situations, a right to object to the legal processing of his or her personal data.
- 7.1.6 The right to data portability: Data subjects have, in certain situations, a right to receive his or her personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data has been provided.
- 7.1.7 You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision is necessary for your employment, the decision has a legal basis, or is based on your explicit consent.
- 7.1.8 If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal of consent.
- 7.1.9 You can always lodge a complaint with a supervisory authority.
- 7.2 In connection with inquiries concerning your rights, we ask that you provide us with adequate information to process your inquiry, including your full name and your email address, so that we may identify you and respond to your inquiry.
- 7.3 More information about data subject rights can be found in the guidelines of the national data protection authorities. If a data subject wishes to make use of his or her rights as described above, the data subject is asked to use the contact details provided at the end of this Policy. We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.

8. Changes to this Policy

- 8.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

9. Contact

9.1 You may contact us at the below-specified email if you:

- disagree with our processing or consider our processing of your personal data infringes on the law,
- have questions or comments to this Privacy Policy, or
- want to invoke one or more of your rights as a data subject described in this Privacy Policy.

9.2 If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at gdpr@qmed-consulting.com.

Yours Sincerely,

Qmed Consulting Group