

Nordania privacy notice for personal customers and other private individuals (Denmark)

Effective from 10. September 2025



1. Our role as data controller and the reason for this privacy notice

This privacy notice applies to the processing of personal data of personal customers, sole traders and other private individuals by Nordania Finans A/S [Danske Leasing A/S] (CVR 78867612) and Nordania Leasing, a division of Danske Bank A/S, [CVR 61126228], Birkerød Kongevej 25, DK-3460 Birkerød, Denmark, (collectively 'Nordania') as data controller. Nordania is part of the Danske Bank Group, and we may therefore refer to Danske Bank's guidelines etc. if these also apply to or are followed by Nordania.

Nordania has appointed a data protection officer (DPO), whose contact details are as follows:

DPO, Danske Bank A/S,
Bernstorffsgade 40, DK-1577 København V
Denmark

Email address: dpofunction@danskebank.dk

We process information about you (personal data), and this privacy notice applies to personal customers, retail customers as well as privately owned businesses (sole traders) and other private individuals, such as guarantors, holders of powers of attorney, guardians and other private individuals with whom Nordania interacts and collaborates.

This privacy notice sets out how and why and on what legal basis Nordania processes your personal data and how we protect your privacy rights.

See section 12 for more information on how to contact Nordania in case you have questions related to how Nordania processes your personal data.

Please note that we have separate privacy notices applicable to business customers, board members, executive board members and other key function holders, closely related persons and shareholders.



2. Types of personal data we collect and process

Depending on the services and products you have or are interested in and the necessity of processing personal data in that respect, we collect and process various types of personal data, including, but not limited to, the examples of personal data listed below:

- identification information, such as your name, civil registration number or other national ID number, and proof of identity, such as a copy of your passport, driver's license and/or birth certificate
- contact information, including your address, telephone number and email address
- financial information, including information about your income, assets, debts, credit assessments, insurances, pensions, taxes, environmental impact and members of your household (number and age of persons)
- information on security and collateral, including market values
- educational information, such as your education, profession, work, knowledge and experience
- environmental information and data on the environmental, social and governance (ESG) impact of your business (if you own a private business)
- information about the services and products we provide to you, including information about lease agreements, loans, etc.
- information on how you use our services and products and your preferences in relation to these
- information related to your use of our websites, platforms and digital applications, including – to the extent applicable and necessary – traffic, location, tracking and communication data, e.g. collected by use of cookies and similar technology, cf. also [Nordania's cookie policy](#)
- tracking data if you have consented to this in connection with signing up for newsletters
- information about your devices used to access our websites as well as technical information, including the type of device and operating systems
- information about you and your preferences in connection with various types of marketing and events
- video recordings when you visit our premises

- recordings of telephone conversations, cf. [Recording of phone conversations at Nordania](#), and of online meetings with you
- other personal data as necessary to provide you with specific products or services, or if we are required by law to do so

Our ability to offer the best possible advice and solutions for you very much depends on how well we know you and, consequently, it is important that the information you provide is correct and accurate and that you inform us of any changes.



3. Why and on which legal basis we process your personal information

Generally, we process personal information about you to provide you with the services and products you have chosen, to offer you the best advice and solutions, to protect you and Nordania against fraud, to fulfil our agreements with you and to comply with applicable regulations, including to maintain data security and data protection requirements.

Below, we list some examples of why and on which legal basis we process your personal data in various contexts:

- When we onboard you as a customer, we process your personal data for identification, verification and anti-money laundering purposes. The legal basis for this processing is to comply with a legal obligation*, cf. GDPR art. 6.1(c), for example, pursuant to the Danish Anti-Money Laundering Act (*hvidvaskloven*).
- When we provide you with the financial product you have requested or consider obtaining, such as lease agreements or loan agreements (in some cases by other companies in the Danske Bank Group), customer services, customer relationship management, including registration in our CRM systems, administration, credit assessment, recovery of outstanding debt, handling of complaints and/or making information available to service providers authorised to request information about you), we do this because you have entered into or are considering entering into an agreement with us on a service or product, cf. GDPR art. 6.1(b), and to pursue legitimate interests, cf. GDPR art. 6.1(f).
- If, for instance, we propose to share your personal data with another company within the Group, transfer your personal data to a third party for budget building or if we propose to transfer your personal data to a partner so you may receive a quotation for a product or a service, we may do this because you have given us consent to using and sharing your personal data for such specific purposes, cf. GDPR art. 6.1(a), or if we pursue a legitimate interest, cf. GDPR, art. 6.1(f).
- When we communicate with you about the products and services you have requested or send you information on system updates, we do so to fulfil a contract with you, cf. GDPR art. 6.1(b), or subject to a legal obligation*, cf. GDPR art. 6.1(c), or to pursue a legitimate interest, cf. GDPR art. 6.1(f).
- When we improve, develop and manage our IT systems, we may use your personal data for analysis purposes to improve or develop products and services, to test our systems or to develop, train and test IT models. This may be done on the legal basis we have for processing your personal data in our IT systems in the first stage of processing (which could be any of the legal bases mentioned in this section) and/or to ensure a sufficient level of security, cf. GDPR art. 6.1(c), or we may pursue a legitimate interest, cf. GDPR, art. 6.1(f).
- When we set fees and prices for our products and services, including using data analytics and statistics for such purpose, we do this to fulfil contractual purposes, cf. GDPR art. 6.1(b), so that you may receive a price quotation or similar.
- When we carry out fraud detection on card and account transactions, including processing of behavioural data to detect and prevent fraudulent activity in our accounts by identifying unusual, atypical, or suspicious use, as well as registration of payment cards on relevant lists of blocked cards, we do so to comply with legal obligations*, cf. GDPR art. 6.1(c), and to pursue legitimate interests, cf. GDPR art. 6.1(f).
- When we pursue statistical, scientific and research purposes as part of research projects or similar, including anonymisation of personal data for such purposes, we pursue legitimate interests, cf. GDPR art. 6.1(f), or we act in the public interest, cf. GDPR art. 6.1(e).
- When we carry out profiling and marketing of our services and products, including marketing on behalf of other legal entities of the Danske Bank Group, we do so if we have your consent to this, cf. GDPR art. 6.1(a), or are pursuing legitimate interests, cf. GDPR art. 6.1(f).

- We use cookies and similar technology on our website and in our apps for functional, statistical and marketing purposes via digital channels and social media platforms if you have consented to this, cf. GDPR, art. 6.1(a). We refer to our cookie policy for further information ([Nordania's cookie policy](#)).
- When we assess, check, test and monitor our compliance with internal company policies and rules and regulatory and legislative requirements, e.g. in relation to data protection, financial crime or market integrity, we process your personal data subject to legal obligations*, cf. GDPR art. 6.1(c), and to pursue legitimate interests of Nordania, cf. GDPR art. 6.1(f).
- We process your personal data for security reasons, cf. GDPR art. 6.1(c)
- We use video surveillance and record the front of buildings, entrances to our branches and other premises, reception and customer areas where we are pursuing legitimate interests, cf. GDPR art. 6.1(f), and subject to the Danish TV Surveillance Act (*TV-overvågningsloven*).
- When we collect, share and use personal data to build, maintain and use models for credit risk exposure and Internal Ratings Based (IRB) modelling to assess capital requirements, we do so with reference to the Capital Requirements Regulation (CRR), which is required as part of Nordania's risk management, cf. GDPR art. 6.1(c).
- When we send you newsletters, we process your personal data, and we use your email and name for documentation purposes to send you articles, news and updates because you have requested this service from us, cf. GDPR art. 6.1(b). We may also invite you to events and send you marketing material in areas that we think may have your interest, and we track which articles have your interest and which you open on the basis of your consent, cf. GDPR art. 6.1(a).
- We also carry out several other legal, regulatory, administrative and compliance-related processing activities which entail processing of personal data, including identification and verification as stipulated in the Danish Anti-Money Laundering Act, risk management and detection and prevention of fraud, credit fraud and other types of financial crimes, all based on legal obligations*, cf. GDPR art. 6.1(c).

*When we refer to processing of your personal data due to 'legal obligations', this refers to qualifying legal requirements in any of the following statutes and regulations (please note that this list is not exhaustive):

- The Danish Anti-Money Laundering Act (*hvidvaskloven*)
- The Danish Tax Reporting Act (*skatteindberetningsloven*)
- The Danish Bookkeeping Act (*bogføringsloven*)
- The Danish Credit Agreements Act (*kreditaftaleloven*)
- The Danish Financial Business Act (*lov om finansiel virksomhed*)
- The Danish Payments Act (*betalingsloven*)
- The Danish Act on Consumer Loan Businesses (*lov om forbrugslånsvirksomheder*)
- The Danish Marketing Practices Act (*markedsføringsloven*)
- The EU General Data Protection Regulation (GDPR) and the Danish Data Protection Act (*databeskyttelsesloven*)
- The Danish Capital Markets Act (*lov om kapitalmarkeder*)
- The EU Markets in Financial Instruments Regulation (MiFIR)
- The EU Market Abuse Regulation (MAR)
- The Danish Civil Registration System Act (*CPR-loven*)
- The EU Capital Requirements Regulation (CRR)
- The Danish Administration of Justice Act (*retsplejeloven*)
- The Danish TV Surveillance Act (*TV-overvågningsloven*)
- Various Danish tax acts, including the Tax Control Act (*skattekontrolloven*)
- The EU Markets in Financial Instruments Regulations (MiFID I and II)
- The Danish Act on Registration of Vehicles (*lov om registrering af køretøjer*)



4. Sensitive personal data

Some of the information we process about you may be sensitive personal data (also known as 'special categories of data'). Sensitive personal data may, e.g., be information about your health or information about your membership of a union.

Sensitive personal data is subject to specific processing conditions, and we try to avoid processing such personal data when possible. However, in some instances we need to process sensitive personal data about you.

Below you can see examples of types of sensitive personal data we process about you, why we do it and our legal basis (derogations in GDPR art. 9) for doing so:

- We process sensitive personal data about you that may appear in budget information you give us for credit evaluation purposes with your consent, cf. GDPR, art. 6.1(a) and 9.2(a).
- For certain products or services, we may ask to process your sensitive personal data for the purpose of providing you with such a product or service with your consent, cf. GDPR, art. 6.1(a) and 9.2(a).
- We may process sensitive personal data about you to comply with legal requirements that apply to us as a financial institution with legal basis in other legislation, cf. GDPR art. 6.1(c), 9.2(g) and 9.3.
- We may process sensitive personal data about you if such processing is necessary for the establishment, exercise or defence of legal claims, cf. GDPR art. 9.2(f).



5. How we collect the personal data we have about you

Personal data collected from you

We collect information that you share with us or that we obtain by observing your actions, including for example when

- you fill in applications and other forms for ordering services and products
- you submit specific documents to us
- you participate in meetings with us, for example with your adviser
- you talk to us on the phone
- you use our website, mobile applications, products and services
- you participate in our customer surveys or promotions organised by us
- you communicate with us by letter and digital means, including emails, or on social media
- you use our digital solutions or visit our websites
- you provide us with your household information
- we collect personal data from electronic communications, telephone and video recordings and monitoring
- we track your subscription to newsletters

We also store video recordings of you if you have visited our premises. We store this information according to the requirements of the Danish TV Surveillance Act (*TV-overvågningsloven*).

Incoming and outgoing calls and online meetings may be recorded, listened to and stored to comply with regulatory requirements but also for documentation purposes. We refer to our information on recording of phone conversations for details on our recording and processing of personal data in relation to voice and online meeting recordings ([Recording of phone conversations at Nordania](#)).

Personal data collected from use of cookies

We may use cookies and similar technology on our websites and in our digital solutions and apps. When you first enter one of our websites or download our apps, we set necessary cookies to enable you to use our services. If you consent to additional cookies, such as functional, statistical and/or marketing cookies, we set such cookies according to your consent to measure, analyse and improve the use and performance of our products and services and to the extent applicable and relevant to tailor and send you relevant marketing messages.

Some of the marketing cookies are owned by third parties, such as Meta or Google. We share responsibility (joint controllership) for such third parties' use of your personal data which is collected by way of cookies and processed for our benefit. We refer to our cookie policy for further information ([Nordania's cookie policy](#)).

Personal data we collect from third parties

We receive and collect data from third parties, including for example from the following:

- Members of your household if they are customers of Danske Bank, to perform required assessments of the household's finances. We do this to comply with credit assessment requirements, cf. sections 7 c and 52 a of the Danish Credit Agreements Act and section 9 of the Danish Act on Consumer Loan Businesses. If you have a joint loan/lease agreement with someone, we may collect information about you from your co-contracting party.
- The Danish Central Office of Civil Registration (*CPR-kontoret*), or equivalent local central civil registration offices as well as other publicly accessible sources and registers. We process the data for example for identification and verification purposes and to update data and check personal data accuracy, cf. GDPR art. 6.1(f), section 11 of the Danish Data Protection Act and section 43 b of the Danish Financial Business Act.
- Credit information agencies and warning registers. We collect and process the personal data to perform credit assessments. We update the personal data regularly.
- Other entities of the Danske Bank Group if we have your consent, for example to provide you with better customised products and services.
- Other entities of the Danske Bank Group, if existing legislation allows or requires us to share the information, for example if it is necessary to comply with group-based management control and/or reporting requirements established by law such as the Capital Requirements Regulation (CRR).
- External data controllers, such as business partners (including correspondent banks and other banks) and vendors, if we have your consent or if permitted under existing legislation, for example in order to provide you with a service or product provided by an external business partner you have signed up for, to enable our customers to use banking services abroad or to prevent and detect money laundering, fraud, abuse and loss.
- The Danish tax authorities, e.g. when we register you as a user with the Danish Register of Motor Vehicles.
- Insurance companies, e.g. in connection with your motor insurance.
- The Danish Registration Court in connection with registration of retention of title/charges.
- The car dealer in relation to the contractual relationship, e.g. when you request information from the relevant dealer about the residual debt under your purchase contract.
- Businesses and public authorities in connection with the issuance of parking fees or parking fines (if the parking fine or parking fee is sent to us).
- Foreign authorities concerning collection of road tolls when you drive abroad.



6. Third parties that we share your personal data with

We will keep your information confidential under applicable rules, including banking secrecy rules. However, where we have due cause (in Danish '*berettiget videregivelse*') as per some of the examples set out below, we may disclose and share relevant personal data with group companies and third parties, who are also obliged to keep your personal data confidential:

- Other entities of the Danske Bank Group if we have your consent, for example to provide you with better customised products and services.
- Other entities of the Danske Bank Group, if existing legislation allows or requires us to share the information, for example if it is necessary to comply with group-based management or risk management requirements imposed by law or regulations (e.g. the Capital Requirements Regulation) and/or reporting requirements established by law or required by regulators.
- If you are contemplating signing an agreement (for onboarding purposes) with Danske Bank A/S or if you are a customer of Danske Bank A/S, Nordania Finans A/S and/or Realkredit Danmark A/S, we will exchange and pool information about your financial situation, including financial information, credit assessments, etc., and use your civil registration (CPR) number to identify you for the purpose of facilitating the best ongoing risk and credit assessment and anti-money laundering and counter-terrorist financing efforts.
- Information about leased assets (including vehicle identification numbers (VIN)) is shared with Danske Bank A/S for the purpose of facilitating the most appropriate management of underlying financing factors at Danske Bank A/S (particularly in connection with Danske Bank A/S's efforts to offer more environmentally-friendly and sustainable financing).
- The Danish National Special Crime Unit (*National enhed for Særlig Kriminalitet (NSK)*) in accordance with anti-money laundering legislation.

- If you have asked us to transfer money to others, we disclose personal data about you that is necessary to identify you and to perform the transaction.
- When we process your international payments, your personal data may be processed by Swift in the context of Swift's Transaction Processing Services, which enable us to send and receive financial messages or files, and to pre-validate, track and manage financial transactions. For further information on the data protection practices of Swift in relation to the processing of your personal data in the context of Swift's Transaction Processing Services, please consult Swift's Personal Data Protection Policy (PDPP), cf. [Data Protection Policies | Swift](#).
- Service providers authorised as an account information service, payment initiation service or card-based payment instrument provider, if you (or someone who via our online services can view information about your accounts or initiate payments on your behalf) request such a service provider to receive information about you.
- Card producers, when cards are imprinted with your personal data.
- Guarantors, individuals holding a power of attorney, lawyers, accountants, or others you have authorised us to share information with.
- If you have joint financial products with someone, we share your information, including personal identification number, with your co-product holder/owner and for tax reporting purposes.
- Lawyers, accountants, consultants.
- Courier services. Occasionally, we may use courier services to deliver, for example, a physical document or similar items to you, and we disclose your name, address and telephone number to them, so you can receive the documents.
- IT service and outsourcing providers as well as personal data processors to provide services to us and you.
- Social media companies, such as Meta and Google, when you have given your consent for direct marketing purposes.
- Public authorities as required by law or in consequence of court orders or requests from the police, the bailiff, the courts of law or other authorities. This could include the Danish Police, the Danish Public Prosecutor, the Danish National Special Crime Unit (*National enhed for Særlig Kriminalitet (NSK)*), the Danish tax authorities in accordance with the Danish Tax Reporting Act, municipalities with reference to the Danish Act on Legal Protection and Administration in Social Matters and the Danish central bank (*Danmarks Nationalbank*) for statistical and other purposes.
- Regulators, such as the Danish Financial Supervisory Authority (*Finanstilsynet*), the Data Protection Agency (*Datatilsynet*), the Agency for Digital Government (*Digitaliseringsstyrelsen*), law enforcement agencies and other authorities in Denmark or abroad, in connection with their duties.
- Credit information agencies. If you default on your obligations to Nordania, we may report you to credit information agencies and/or warning registers in accordance with applicable law.
- Debt collection agencies. If you default on your performance on a credit agreement, we will transfer information of your debt to a debt collection agency.
- For social and economic research or statistical purposes, including where it would be in the public interest.
- In connection with transactions (including transfers, asset sales, mergers and acquisitions) which entail transfer of all or part of your business to another company, we may share your personal data to the extent necessary to complete the transfer and your customer relationship within the framework of the legal requirements we must comply with.
- We may disclose your personal data to third parties within and outside the Danske Bank Group as part of the electronic case processing of your consideration of [application] and conclusion of agreements with us, and such third parties may also in certain circumstances share your personal data with each other.
- The Danish tax authorities, e.g. when we register you as a user with the Danish Register of Motor Vehicles.
- Insurance companies, e.g. in connection with your motor insurance.
- The Danish Registration Court in connection with registration of retention of title/charges.
- The car dealer in relation to the contractual relationship, e.g. when you request information from the relevant dealer about the residual debt under your purchase contract.
- When your vehicle lease agreement has ended, we will subsequently sell the car, for which purpose the original registration certificate for the car must be enclosed. As this registration certificate contains your name and address, this information will be disclosed to the purchaser of the car. The purchaser will always be a commercial car dealership, which uses the registration certificate to re-register the car.
- If you have entered into an agreement (lease agreement, loan agreement or purchase contract) for a car of the makes Volkswagen, Audi, Seat, Skoda or Porsche, and if you have entered into a repair and service agreement in that

connection, we will exchange your personal data, including name and address, and the VIN of the car, with Skandinavisk Motor Co. A/S and the relevant repair shop for the purpose of managing the invoicing of the relevant repair and service agreement.

- If you have entered into a lease agreement for a car of the makes Volkswagen, Audi, Seat or Skoda, the car is fitted with an OBD box. For the purpose of managing the settlement/invoicing thereof, we will exchange the VIN of the car and the lease agreement details with Skandinavisk Motor Co. A/S.
- If you have entered into a lease agreement, your car will be inspected at a repair shop when you return the car. For the purpose of managing this return, we may in certain circumstances exchange information with the relevant repair shop.



7. Profiling and automated decisions

Profiling

We are constantly working to develop, improve and manage our products and systems. We use data analysis and statistics and evaluate our analyses, models and theories on customer behaviour with the use of advanced, innovative analytical methods, such as machine learning and AI. For example, this helps us set fees and prices and provides the basis for our marketing and business development. We continually process customer personal data, develop profiles with the use of machine learning models to help us offer products that meet our customers' unique needs and prioritise customer enquiries in an efficient way. We also process personal data for process and system development and improvement purposes, including through tests. We use transactional, behavioural and demographic personal data for statistical analysis and for developing new models, products and services. We analyse publicly available data, internal data, including data from other Group companies, and external data. The analyses allow us to create customer profiles and capture life-changing events, such as first job, home purchase or retirement. We do this to be a relevant financing partner for our customers and to provide the best financial advice. Our processing of personal data for the above-mentioned purposes is always based on an appropriate legal basis, such as your consent, and you will be informed in more detail when we use your personal data in such a process. We use cookies and similar technology on our websites and in our digital apps for marketing purposes, including for marketing via digital channels and social platforms such as Facebook. We refer to our cookie policy for further information.

Automated decision-making

With automated decision-making, we use our systems to make decisions without any human involvement based on the personal data we have about you. Depending on the specific decision, we also use personal information from public registers and other public sources. Automated decision-making helps us ensure that decisions are quicker and more fair, efficient and correct than decisions made through a similar manual process.

We will always inform you directly when we use your personal data in a process with automated decision-making. An example of our use of automated decision-making processes is in relation to loans and lease agreements, where we use information about your income, your expenses and how well you have kept up on payments in the past. This will be used to determine the amount of money we can lend you and, for lease agreements, the lease payment we can offer you.

See section 10 'Your rights' for more information on your rights in relation to automated decisions.



8. Transfer of personal data to third countries

Your personal data may be processed by our business partners within the EU/EEA if we request that such partners provide you with various services on our behalf.

In some cases, we use various IT suppliers, business partners and consultants, etc., who can access personal data from countries outside the EU/EEA, if necessary, despite such personal data generally not being stored in these third countries.

Such IT providers, partners, etc. are subject to data processing or data sharing agreements with us, which ensure that they process personal data only in accordance with the GDPR and applicable EU and national data protection laws. We primarily choose providers/partners that process personal data within the EU/EEA, and secondly suppliers in countries that appear on the European Commission's list of safe third countries. We will choose suppliers in other third countries only if necessary. Accordingly, we rely on different legal bases depending on the country of the personal data recipient:

- If we transfer your personal data to parties in countries where the European Commission has found that the country ensures an adequate level of protection, we rely on the adequacy decision of the European Commission as our GDPR art. 45 transfer basis.
- If we transfer your personal data to parties located in the USA, we may rely on the EU-US Data Privacy Framework to certified parties as our GDPR art. 45 transfer basis.
- If we transfer your personal data to other third countries, we may rely on the European Commission's standard contractual clauses (also known as SCCs) or a business partner's binding corporate rules (also known as BCRs) together with implementation of adequate supplementary measures to ensure that your personal data receives an essentially equivalent level of protection to that guaranteed in the EU/EEA, if and where deemed necessary, as our legal basis for transfer under GDPR art. 46.
- We may also transfer your personal data to parties outside the EU/EEA on the basis of the specific derogations set out in GDPR art. 49, for example in GDPR art. 49.1(e), if the transfer is necessary for our establishment, exercise or defence of a legal claim.

When transferring personal data to a business partner outside of the EU/EEA, we ensure that our transfer of your personal data is conducted in accordance with GDPR Chapter V.

You can read more on personal data transfers to third countries on the following websites:

- the Danish Data Protection Agency's website: <https://www.datatilsynet.dk/english> and
- the European Commission's website: https://commission.europa.eu/law/law-topic/data-protection/data-protection-eu_en



9. How long do we store your personal data?

We store your personal data only for as long as it is needed for the specified purposes for which your personal data was registered and used or as required by law for the purpose stated by the legislator. The personal data will subsequently be deleted or irreversibly anonymised.

We have many different processes where we use your personal data and many different legal bases for retention of your personal data. Our retention periods vary from a few minutes up to 30 years. Below you will see some examples of retention periods, but please note that the list is not exhaustive:

- We keep your account information for up to 10 years in accordance with the statutory limitation periods.
- We keep your Know Your Customer information for as long as you are a customer and for an additional five years as required by the Danish Anti-Money Laundering Act.
- We keep credit and collateral agreements for up to 10 years after expiry to document our agreement so we may defend our legal rights within statutory limitation periods.
- We keep lease agreements for up to five years after expiry to document our agreement.
- We keep your consent to our use of cookies for one year unless you withdraw it earlier.
- In one circumstance, we keep your personal data for a period of up to 30 years. This is exclusively for use in our Internal Ratings Based (IRB) models used for Nordania's and Danske Bank's risk management and calculation of capital requirements under the Capital Requirements Regulation (CRR) and where we are required to document financial crisis cycles.
- We keep your voice recordings for 15 months for general documentation purposes. Reference is made to our information on recording of phone conversations for details on our recording and processing of personal data in relation to voice and online meeting recordings ([Recording of phone conversations at Nordania](#)).

- If you, as a potential new customer, have asked for an offer for a loan, a lease agreement or another product or service, but decline the offer and do not become a customer, your personal data will normally be stored for six months, but may for some purposes be stored longer to comply with legal obligations, for example under the Danish Anti-Money Laundering Act.
- Surveillance videos are deleted 30 days after they were made in accordance with the Danish TV Surveillance Act (*TV-overvågningsloven*). In case of a police investigation, the video may be stored for a longer period.



10. *Your rights*

Your rights in relation to personal data are described below. To exercise your rights, you can use any channel to contact us, for example:

- Contact us on our main telephone number [+45 45 12 12 12]
- Contact your adviser directly, if you have one, or send a message via our website as described under 'Contact us'.

See section 13 for more information on how to contact Nordania about data protection.

Right of access to your personal data

You have the right to request access to your personal data and to request information about the processing we carry out. Your right of access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. Access to video surveillance may be restricted due to the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to employees. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of access.

If you wish to exercise your right of access under the GDPR, the best way to contact us is to write to us at gdpr-insight@nordania.dk. However, you may also contact us via your adviser or by sending a message via our website as described under 'Contact us'.

Rights related to automated decision-making

When we use automated decision-making in our processes, you will always be notified separately in advance about our legal basis for this and your option to be excluded from automated decision-making. Furthermore, you will be informed about the reasoning behind automated decision-making, and you will be given the opportunity to express your point of view and to object to the decision, and of your right to request a manual review of any automated decision.

Right to object to processing

In certain circumstances, you have the right to object to the processing of your personal data, for instance when we use automated decision-making processes, or, for example, when the processing is based on our legitimate interests. You have the right to object to our use of your personal data for direct marketing purposes, including profiling that is related to such purpose.

Right to rectification of your data

If your personal data is inaccurate, you are entitled to have your personal data rectified. If your personal data is incomplete, you are entitled to have the personal data completed, including by means of providing us with a supplementary statement.

Right to erasure ('right to be forgotten')

You are entitled to have your personal data erased if the personal data is no longer necessary for the purposes for which it was collected.

However, in the following cases, we are required to keep your personal data:

- To comply with a legal obligation*, for instance if we are obliged by law to hold your personal data for a certain period, for example as stipulated in the Danish Anti-Money Laundering Act or the Danish Bookkeeping Act. In such situations, we cannot erase your personal data until the required retention period has expired.

- For the performance of a task carried out in the public interest, such as sending statistical data to the Danish central bank (*Danmarks Nationalbank*).
- For establishment, exercise or defence of legal claims.

Restriction of use

If you believe that the data that we have registered about you is incorrect, or if you have objected to our use of the data, you are entitled to obtain restricted processing of your personal data for retention only until we can verify the correctness of the data or if our legitimate interests outweigh your interests or not.

Withdrawal of a consent

Where consent is the legal basis for a specific processing activity, you can always withdraw your consent at any time by contacting Nordania [see the section above or section 12]. Please note that if you withdraw your consent, we may not be able to offer you specific services or products. Please also note that we will continue to use your previously collected personal data, for example to fulfil an agreement we have made with you or if we are required by law to do so. Some consents are provided for one action only (such as consent to sharing personal data with a third party), also called one-time consents. Withdrawal of a one-time consent will not have legal effect due to the nature of the consent.

Data portability

You have the right to receive personal data which you have provided to us yourself in a structured, commonly used and machine-readable format for personal use. You also have the right to request that we transmit this data directly to another data controller.



11. Connected products

Below, you will find information regarding connected products in accordance with Article 3(2) of EU Regulation 2023/2854 of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation 2017/2394 and Directive 2020/1828 (the Data Act).

When you lease, purchase, or use products leased or sold by Nordania, and such products can be categorised as “connected products” (including vehicles with digital features, IT equipment, etc.), certain types of product data are generated and processed. More detailed information is provided below:

Type, format, and estimated volume of product data

Certain vehicles (connected products) may generate data such as driving patterns, location, technical status, and user interaction. Similarly, IT equipment (connected products) may generate various types of data depending on the specific IT product in question. Examples of such data types include log files (including traffic logs), user data, system data, location data, user interaction, network activity, security data, and/or app logs for items such as computers, servers, network equipment, and other IT hardware.

The format is typically structured digital logfiles, and the volume depends on the product’s features and usage. However, it can potentially amount to several hundred MB per month, depending on the specific vehicle or IT product and its level of use.

Continuous and real-time generation

Most modern connected products are capable of generating data continuously and in real time, particularly during active use and/or specific events such as traffic accidents, IT software crashes, etc.

Storage of data

Data is typically stored locally in the connected product’s operating system and/or on remote servers managed by the manufacturer or its data processors. The retention period varies and depends on the manufacturer’s policies. Nordania does not have direct access to this data, and we therefore refer you to the relevant manufacturer for specific details.

Accessing, retrieving, and deleting data

Users can typically access and retrieve data via the vehicle or IT equipment itself (the connected product), the manufacturer's app, or web portal. The ability to delete data depends on the manufacturer's technical capabilities and policies. Nordania does not provide technical solutions for this but refers users to the manufacturer's tools.

Reference to manufacturers

As Nordania does not have full insight into the individual manufacturers' technical specifications, solutions, policies, or systems for generating, processing, and storing product data for connected products, we refer to the relevant manufacturer for further and updated information regarding data generation and management for the connected product in question.

If there is any uncertainty regarding the manufacturer's contact details, you can reach out to nordania@nordania.dk, and we will assist you to the best of our ability.



12. Changes to this privacy notice

We are required to update this privacy notice on a regular basis. When we do, you will see that the 'effective from' date at the top of this document changes. If changes to how your personal data is processed will have a significant effect on you personally, we will take reasonable steps to notify you of the changes to allow you to exercise your rights (for example to object to the processing).



13. Contact details and how to complain

You are always welcome to contact us if you have questions about your privacy rights and how we process personal data. You can contact us on our main telephone number [+45 45 12 12 12] or contact your adviser directly, if you have one. You can also send a message via our website as described under 'Contact us', or you can send a letter to Nordania, Birkerød Kongevej 25, DK-3460 Birkerød, Denmark.

You can contact our DPO with all questions on our use of your personal data by email to dpofunction@danskebank.com or by sending a letter to Bernstorffsgade 40, DK-1577 København V, Denmark.

If you are dissatisfied with how we process your personal data or if your dialogue with our DPO has not led to a satisfactory outcome, you may also lodge a complaint with the Danish Data Protection Authority: Datatilsynet, Carl Jacobsens Vej 35, DK-2500 Valby, Denmark, email: dt@datatilsynet.dk.

If, for example, your residence or the place of the alleged infringement is in or is associated with another member state than Denmark, you can typically also lodge a complaint with the data protection authority in that member state. You always have the option to try your case in court.

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