



PRIVACY POLICY

SEMLER PREMIUM DENMARK A/S

This privacy policy explains how SEMLER PREMIUM DENMARK A/S ("we" or "us") processes your personal data.

1 DATA CONTROLLER

The legal entity responsible for processing your personal data is:

Semler Premium Denmark A/S

Co. no. 45 31 09 81

Park Allé 355

2605 Brøndby

Denmark

persondata@semmler.dk

+ 45 43 28 82 00

2 DESCRIPTION OF PROCESSING

Purpose	Categories of personal data	Sources	Legal basis	Recipients	Retention
Sale, rent and leasing					
<p>a. Offers and Sale Personal data is used to prepare offers on vehicles, for placing orders to our factories, for sales and registration of vehicles, including deregistration, for vehicle valuation, for vehicle insurance, for installing tracking equipment, and for preparing driving slips in connection with test drives of vehicles.</p> <p>b. Rental of vehicles Personal data is used for the administration of vehicle rentals.</p> <p>c. Rentals and demo vehicles Rental and demo vehicle delivery Personal data is used for the delivery of rental vehicles and the use of demo vehicles, as your location may be monitored in connection with the use of these.</p> <p>d. Logistics and distribution Personal data is used for the export of vehicles, delivery/pickup, and preparation of vehicles, as well as for the transport and</p>	<p>We process the following personal data about you:</p> <p>General personal data</p> <ul style="list-style-type: none"> Name, address, e-mail, telephone number, driver's license, customer number, photo/video, health insurance card, signature, order number, CPR no. Information about purchased or rented products, including registration number, registration certificate including power of attorney, chassis number, information about and any picture of the purchased or rented product, any rental period, damage to the vehicle, accidents and breakdowns in which the vehicle is involved and other information that follows from the individual agreement. Information about any debts in the car, invoice data, your experience, technical data from your car. Payment information, insurance information, job 	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> Directly from you Public authorities, including the police, in the event of a possible violation of the Road Traffic Act during a test drive, Banks and financial institutions (information on outstanding debt in vehicles we buy) Credit reference agencies. Insurance companies we have taken out insurance with 	<p>Legal basis for processing of personal data:</p> <ul style="list-style-type: none"> Entering into and fulfilling a contract Article 6.1.b (necessary for the performance of a contract to which you are a party). Legal obligations Article 6.1.c (necessary for us to comply with a legal obligation). The legal obligations in this connection follow from Consolidated Act no. 720 of 30 May 2017 on the registration of vehicles, section 7d, and Executive Order no. 463 of 2 May 2013 on the rental of motor vehicles without a driver, sections 4-6 and Executive Order no. 1618 of 18 December 2018 on liability insurance of motor vehicles and Executive Order no. 866 of 19/06/2023 on registration of vehicles, Section 38(5) and Executive Order amending the Executive 	<p>We can share your personal data with:</p> <ul style="list-style-type: none"> The factories where vehicles are produced and their group companies Group companies Suppliers and resellers, including IT suppliers, support, goods suppliers. Partners, including for car valuation, satisfaction surveys, external preparation of vehicles, wholesale buyers, leasing companies, intermediaries, transport companies. Financial institutions that we work with to assist our business, including banks and finance companies Insurance companies we have taken out insurance of vehicles with. Public authorities, including SKAT and the Danish Motor Vehicle Agency 	<p>We process the personal data for as long as necessary for the purposes mentioned below.</p> <p>We store information about you for as long as you are an active customer with us. We consider you an active customer as long as we have been in contact with you within the past three years. Information about you is deleted when you have not been an active customer for one year; i.e. 4 years after our last contact with you.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> Information included in bookkeeping material (invoices, confirmations and correspondence regarding the application of additional equipment, including special tracking equipment on the vehicle, etc.) is stored as a minimum in accordance with the rules of the Bookkeeping Act; i.e. 5 years from the end of the financial year to which the registration relates, regardless of whether your customer relationship may end before then Information used in connection with the registration of vehicle users is stored until registration has

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<p>relocation of ordered vehicles. Personal data is also used to register primary and secondary users of vehicles.</p> <p>e. Credit assessment Personal data is used for credit assessment in connection with account creation.</p> <p>f. General support Personal data is used for general communication and support in connection with the delivery of our services, as well as to support our relationship with you.</p> <p>g. Video surveillance There may be video surveillance at our locations for security and crime prevention purposes.</p> <p>h. Statistics Personal data is also used to compile internal statistics on sold vehicles.</p>	<p>title, information about registration with a credit information agency.</p> <ul style="list-style-type: none"> Images from video surveillance. <p>Personal data relating to offences and criminal convictions</p> <ul style="list-style-type: none"> Violation of criminal legislation, including the Road Traffic Act in connection with test drives. <p>Other data</p> <ul style="list-style-type: none"> In addition, in certain cases, additional personal data of a more private nature may be processed, including information about hobbies, holiday trips and other information that you choose to provide to us. We must emphasize that we do not actively request this information and thus only process it to the extent that you voluntarily choose to share such information with us. Photo and video recordings of your vehicle in connection with 		<p>Order on the Registration of Vehicles (Executive Order no. 741 of 17 June 2024)</p> <ul style="list-style-type: none"> Legitimate interests Article 6.1.f (Necessary for the pursuit of our legitimate interests). The legitimate interests pursued are, in addition to being able to defend, establish or assert legal claims: <ul style="list-style-type: none"> i) Our interest in ensuring that we can provide a good service to you, including that we can continuously improve our service based on feedback from you ii) our interest in being able to offer you payment and credit terms that are adapted to your financial situation iii) our interest in being able to communicate effectively with you, including being able to target marketing and other communications to your interests 	<ul style="list-style-type: none"> Police and parking companies in relation to fines and fees related to your use of the rented vehicle. Counsellors. 	<p>taken place or up to 6 months after.</p> <ul style="list-style-type: none"> Driving licences (information on test drives) are stored for 5 years However, vehicle information is retained throughout the lifetime of the vehicle Video recordings are deleted after 30 days. The registration certificate and associated power of attorney are stored for 12 months Video recordings of your vehicle during workshop visits are stored for 18 months

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	workshop visits to describe conditions found during inspection of the vehicle.		<ul style="list-style-type: none"> iv) our interest in keeping statistics on sold vehicles, etc. for internal use. v) optimisation of warehouse logistics and internal follow-up on sales, as well as optimisation of business operations and ensuring quality of workshop work and sales. • Article 10, cf. Section 8 of the Data Protection Act regarding information on criminal offences and criminal convictions • Section 11 of the Danish Data Protection Act (GDPR) regarding civil registration numbers. 		
Financing & leasing					
Data is used to obtain quotes and assist you in entering into agreements with financing and leasing companies on financing, including leasing of vehicles, export of vehicles, delivery/collection and preparation of vehicles, as well as for the transport and relocation of ordered vehicles. We only collect	<p>We process the following personal data about you:</p> <p>General personal data</p> <ul style="list-style-type: none"> • Name, address, e-mail, telephone number, driver's license, health insurance card, signature, civil registration number. 	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you 	<p>Legal basis for processing of personal data:</p> <ul style="list-style-type: none"> • Entering into and fulfilling a contract Article 6.1.b (necessary for the performance of a contract to which you are a party or for the implementation of measures taken at the 	<p>We can share your personal data with:</p> <ul style="list-style-type: none"> • Finance and leasing companies. 	The information is deleted when it is confirmed that the financing or leasing company has received the information.

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<p>this information for the purpose of disclosure to financing and leasing companies.</p>	<ul style="list-style-type: none"> Registration number, registration certificate, chassis number, information about the purchased, rented or leased product, invoice data. Marital status, household information, payment information, information about your finances, insurance information, job title. 		<p>request of the data subject prior to the conclusion of a contract)</p> <ul style="list-style-type: none"> Legitimate interests Article 6.1.f (Necessary for the pursuit of our legitimate interests). The legitimate interest is our interest in being able to assist you in entering into agreements with financing and leasing companies on financing. Section 11 of the Danish Data Protection Act Section 11 of the Danish Data Protection Act regarding civil registration numbers. 		
Aftersales					
<p>a. Offers Personal data is used for the preparation of offers, workshop visits, service, vehicle inspections, vehicle repairs, vehicle returns, vehicle storage, vehicle transport, mobility services and roadside assistance, as well as ordering and storing wheels.</p> <p>b. Credit assesment</p>	<p>We process the following personal data about you:</p> <p>General personal data</p> <ul style="list-style-type: none"> Name, address, e-mail, telephone number, customer number, order number, driver's license, payment information. Registration number, chassis number, registration certificate, information about the 	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> Directly from you From the factories (where vehicles are produced) Insurance companies Rescue companies Police 	<p>Legal basis for processing of personal data:</p> <ul style="list-style-type: none"> Entering into and fulfilling a contract Article 6.1.b (necessary for the performance of a contract to which you are a party). Legal obligations Article 6.1.c (necessary for us to comply with a legal obligation). The 	<p>We can share your personal data with:</p> <ul style="list-style-type: none"> The factories where vehicles are produced and their group companies Group companies Suppliers and dealers, including IT suppliers, support, goods suppliers, tire hotels. Business partners, including leasing 	<p>We process the personal data for as long as necessary for the purposes mentioned below.</p> <ul style="list-style-type: none"> We store information about you for as long as you are an active customer with us. We consider you an active customer as long as we have been in contact with you within the past three years. Information about you is deleted when you have not been an active customer for one year; i.e.

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<p>Personal data is used for credit assessment in connection with account openings.</p> <p>c. Video surveillance For reasons of security and crime prevention, there may be video surveillance at our locations.</p>	<p>car's condition, pictures of the car, technical data from the car, your geographical location in connection with rental and demo vehicles.</p> <ul style="list-style-type: none"> Information on registration with a credit reference agency (only in connection with account opening). Insurance information, appraiser reports, customer experience. Images from video surveillance <p>Personal data relating to offences and criminal convictions</p> <p>Violation of criminal law, in the event of a violation of the Road Traffic Act during test drives, and in cases where such personal data is provided by insurance companies in insurance cases where we carry out repairs.</p>	<ul style="list-style-type: none"> Credit reference agencies. 	<p>legal obligations in this connection follow from Consolidated Act no. 720 of 30 May 2017 on the registration of vehicles, section 7d, and Executive Order no. 463 of 2 May 2013 on the rental of motor vehicles without driver, sections 4-6 and Executive Order no. 1618 of 18 December 2018 on liability insurance of motor vehicles</p> <ul style="list-style-type: none"> Legitimate interest Article 6.1.f (Necessary for the pursuit of our legitimate interests). The legitimate interests pursued are: <ul style="list-style-type: none"> i) Our interest in ensuring that we can provide a good service to you, including that we can continuously improve our service based on feedback from you ii) our interest in being able to offer you payment and credit terms that are adapted to 	<p>companies, preparation companies, transport companies, insurance companies, the trade association Forsikring & Pension, rescue companies, car painters, etc.</p> <ul style="list-style-type: none"> Financial institutions that we work with to assist our business, including insurance companies Police and parking companies in relation to fines and fees related to your use of a rental car. 	<p>4 years after our last contact with you.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> Information included in bookkeeping material (invoices, etc.) is stored at least in accordance with the rules of the Bookkeeping Act; i.e. 5 years from the end of the financial year to which the registration relates, regardless of whether your customer relationship may end before then Driving licences (information on test drives) are stored for 5 years However, vehicle information is retained throughout the lifetime of the vehicle Video recordings are deleted after 30 days.

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			<p>your financial situation</p> <p>iii) our interest in being able to communicate effectively with you, including being able to target marketing and other communications to your interests;</p> <p>iv) our interest in keeping statistics on sold vehicles, etc. for internal use</p> <p>v) Our interest in preventing crime and ensuring that it is safe and secure to move around our locations.</p> <ul style="list-style-type: none"> • Section 8 of the Danish Data Protection Act Article 10, cf. Section 8 of the Data Protection Act regarding information on criminal offences and criminal convictions 		
Collection and disclosure to the EU					

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<p>a. Collection and disclosure of data on vehicle fuel and energy consumption Personal data is used for the purposes of. to comply with applicable EU legislation on the collection and reporting of data on the fuel and energy consumption of passenger cars and light commercial vehicles to the manufacturer, the European Commission and the European Environment Agency (EEA). We collect information about fuel and energy consumption as well as the car's identification number (VIN number / chassis number) in connection with the vehicle being handed in for service, repair or other types of intervention.</p>	<p>We process the following personal data about you:</p> <p>General personal data</p> <ul style="list-style-type: none"> Information on fuel and energy consumption, information on the ratio of driving time to distance travelled with the cruise control system switched on or off, and whether the speed limit has been observed, including the time when the speed assistance system is switched on or off. 	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> Directly from you 	<p>Legal basis for processing of personal data:</p> <ul style="list-style-type: none"> Consent Article 6.1.a (consent). With your consent, we will process data from the intelligent speed assistance system in accordance with the GDPR. Regulation (EU) 2021/1958 of the European Parliament and of the Council, Article 4(1). We are obliged to report data on fuel and energy consumption in accordance with the Standards of Taxation and Energy. Regulation (EU) 2021/392 of the European Parliament and of the Council, Article 9(2). 	<p>We can share your personal data with:</p> <ul style="list-style-type: none"> The European Commission and the European Environment Agency (EEA). The factories where vehicles are produced and their group companies, Semler Group's group companies. 	<p>We process the personal data for as long as necessary for the purposes mentioned below.</p> <ul style="list-style-type: none"> Information on fuel and energy consumption is stored until this data has been transmitted to the manufacturer, the European Commission and the EEA in accordance with Regulation (EU) 2021/392. Information on the use of intelligent speed assistance systems is aggregated and processed anonymously by the European Commission and the EEA in accordance with Regulation (EU) 2021/1958 of the European Parliament and of the Council.
<p>b. Collection and disclosure of data on the use of intelligent speed assistance systems The personal data is collected for the purpose of to comply with existing EU legislation on the development of intelligent speed assistance systems.</p>					

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Marketing and competitions					
<p>a. Events Personal data is used to register for and hold events, driving courses, etc. for customers, as well as for use in press trips and lending of press cars to journalists.</p> <p>b. News and offers Personal data is used for marketing purposes, including targeting our communication with you based on your areas of interest and focus and sending you relevant news, promotions, offers, etc.</p> <p>c. Social media Personal data is used for marketing via social media in connection with events, purchase of vehicles, etc.</p> <p>d. Competitions Personal data is used for participation in competitions where our product is included in the prize.</p>	<p>We process the following personal data about you:</p> <p>General personal data</p> <ul style="list-style-type: none"> Name, address, e-mail, customer number, telephone number, civil registration number, passport information, driver's license, your interests, any allergies, payment information, information about relatives, pictures of the car and possibly you. Other information you provide to us in relation to competitions. Information about the product (prize) in relation to competitions: Chassis number, registration number and/or other technical information. <p>Sensitive personal data</p> <ul style="list-style-type: none"> Health information for use in any special consideration during events held by us. 	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> Directly from you From the factories (vehicle manufacturers) Group companies. 	<p>Legal basis for processing of personal data:</p> <ul style="list-style-type: none"> Consent Article 6.1.a and 9.2.a (consent). Entering into and fulfilling a contract Article 6.1.b (necessary for the performance of a contract to which you are a party) Legitimate interests Article 6.1.f (Necessary for the pursuit of our legitimate interests.) The legitimate interest pursued is our interest in ensuring effective and relevant communication with you and the appropriate organisation of our activities in this area. Section 11 of the Danish Data Protection Act Section 11 of the Danish Data Protection Act regarding civil registration numbers. 	<p>We can share your personal data with:</p> <ul style="list-style-type: none"> The factories where vehicles are produced and their group companies Group companies Suppliers and resellers, including IT suppliers, support, goods suppliers. Business partners, including travel agencies, airlines, hotels, etc. 	<p>We process the personal data for as long as necessary for the purposes mentioned below.</p> <ul style="list-style-type: none"> We store information about you for as long as you are an active customer with us. We consider you an active customer as long as we have been in contact with you within the past three years. Information about you is deleted when you have not been an active customer for one year; i.e. 4 years after our last contact with you. <p>Exceptions:</p> <ul style="list-style-type: none"> Information included in bookkeeping material (invoices, etc.) is stored at least in accordance with the rules of the Bookkeeping Act; i.e. 5 years from the end of the financial year to which the registration relates, regardless of whether your customer relationship may end before then Driving licences (information on test drives) are stored for 5 years Passport information and other information collected solely for the purpose of your participation in events that involve travel and accommodation arranged by

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					<p>us will be deleted no later than one month after the event has been held.</p> <ul style="list-style-type: none"> ○ We process your name and e-mail for as long as you are subscribed to our newsletter and for up to 2 years from the withdrawal of consent to receive marketing material from us. ○ Information collected in connection with competitions is deleted three months after the competition has expired. Information about the prize recipient may be processed for a longer period of time, depending on the product (prize).
Website administration					
<p>Data is collected through your use of our website. We use this information, for example, to optimize the user experience on our website, quality purposes and the services we offer. See more about this in our cookie policy: https://www.semlerpremium.dk/cookies/</p>	<p>We process the following personal data about you:</p> <p>General personal data</p> <ul style="list-style-type: none"> • IP-adresse, betalingsoplysninger, andre oplysninger fra brug af hjemmeside. • Oplysninger indhentet i forbindelse med chat: navn, e-mail, telefonnummer og chatkorrespondance. 	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you 	<p>Legal basis for processing of personal data:</p> <ul style="list-style-type: none"> • Legitimate interests Article 6.1.f (necessary for the pursuit of our legitimate interests.) The legitimate purpose is to be able to provide the services that you have requested, to be able to further develop and optimize the user experience on our website, and to be able to help and guide you via our chat. 	<p>We can share your personal data with:</p> <ul style="list-style-type: none"> • Suppliers and resellers, including IT suppliers, support, goods suppliers. 	<p>We process the personal data for as long as necessary for the purposes mentioned below.</p> <ul style="list-style-type: none"> • We store IP address and data about the use of the website for up to 2 years after you last visited the website. • Information collected in connection with chat is stored for up to 12 months after you have contacted us on our website via chat.

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Recruitment					
<p>Recruitment of employees</p> <p>We process your personal data when you apply for a position with us.</p>	<p>We process the following personal data about you:</p> <p>General personal data</p> <p>2.1 Navn, e-mail, telefonnummer, hjemmearadresse, fødselsdato, civilstand, informationer om pårørende, CPR-nr. eller lign., nationalitet, køn, oplysninger om tidligere ansættelser og referencer, uddannelseshistorik, professionelle kvalifikationer, sprog og andre kompetencer, resultater af persontype- og færdighedstests, fotos og videoklip, sproglige og erhvervsmæssige præferencer samt øvrige personoplysninger indeholdt i ansøgninger, udtalelser og CV.</p> <p>2.2 Derudover behandles for ansøgere under 18 år oplysninger om forældremyndighedsindehavere eller værge.</p> <p>2.3 For visse stillinger i koncernen kræves sikkerhedsgodkendelse.</p>	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> • Directly from you • Group companies • Online sources, such as social media that are publicly available • From third parties, which may include: <ul style="list-style-type: none"> i) References ii) Former employees, or iii) Other third parties, including background check agencies, government agencies for security clearances, and recruitment agencies. 	<p>Legal basis for processing of personal data:</p> <ul style="list-style-type: none"> • Consent Article 6.1.a (consent) • Entering into and fulfilling a contract Article 6.1.b (necessary for the performance of a contract to which you are a party or for the implementation of measures taken at the request of the data subject prior to the conclusion of a contract). • Legitimate interests Article 6.1.f (Necessary for the pursuit of our legitimate interests). Our legitimate interest in this regard is to ensure the selection and recruitment of the right candidates for positions within the company. • Obligations and rights under labour, health and social law 	<p>We can share your personal data with:</p> <ul style="list-style-type: none"> • Suppliers and resellers, including IT suppliers • Group companies • Referees • Public authorities, including the police in connection with security clearance. 	<p>We process the personal data for as long as necessary for the purposes mentioned below.</p> <ul style="list-style-type: none"> • Information about applicants who are not employed is stored for up to 6 months after the final rejection, unless the applicant has consented to longer storage • Information about successful applicants will be transferred to their personnel file and retained in accordance with the deadlines set out in our Employee Privacy Policy.

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	<p>Vi vil derfor foranledige en sådan udført, hvis du skal varetage et sådant job.</p> <p>Følsomme oplysninger</p> <p>2.4 Oplysninger vedrørende fagforeningsmæssigt tilhørsforhold og helbredsoplysninger.</p> <p>Personoplysninger vedrørende lovovertrædelser og straffedomme</p> <ul style="list-style-type: none"> Oplysninger om overtrædelse af strafbelagt lovgivning samt information på straffeattest. 		<p>Article 9.2.b (necessary for the purpose of complying with or enforcing obligations and rights under labour, health and social law), cf. Section 12 of the Data Protection Act.</p> <ul style="list-style-type: none"> Section 8 of the Danish Data Protection Act Article 10, cf. Section 8 of the Data Protection Act regarding information on criminal offences and criminal convictions. Section 11 of the Danish Data Protection Act Section 11 of the Danish Data Protection Act regarding civil registration numbers. 		

3 OVERFØRSLER TIL LANDE UDENFOR EU/EØS

Some of the third parties we share personal data with may be located outside the EU and EEA. For example:

- Microsoft Online Service, including 365 Dynamic 365. Se the list of locations where Microsoft can process your personal data [here](#).
- Google LLC., including Google Analytics. Se the list of locations where Google can process your personal data [here](#).
- Salesforce Inc.. Se the list of locations where Salesforce can process your personal data [here](#).

We may also exchange data with social media, including when we set 3rd party cookies or otherwise pass on data to them. In this case, personal data may potentially also be transferred to countries outside the EU, depending on the social media platform in question.

In some cases, the country is approved by the EU Commission as a so-called "safe third country", and otherwise the transfer takes place on the basis of the EU Commission's standard contractual clauses. You can obtain a copy of the Standard Contractual Clauses by contacting us at the contact details listed above.

4 AUTOMATED DECISION-MAKING, INCLUDING PROFILING

We use profiling to be able to offer you certain services and products that meet your preferences and interests for marketing purposes. You have the right to object to the profiling. You can object via the website <https://gdpr.semler.dk>.

With automated decision-making, we use our systems to make decisions based on the information we have about you. Automated decision-making enables us to ensure that our decisions are prompt, fair, efficient and correct based on the information we have recorded.

5 YOUR RIGHTS

You have the following rights:

- You have the right to request access to, rectification or erasure of your personal data.
- You also have the right to object to the processing of your personal data and to have the processing of your personal data restricted.
- **In particular, you have an unconditional right to object to the processing of your personal data for direct marketing purposes.**
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before your withdrawal of your consent.
- You have the right to receive the personal data you have provided yourself in a structured, commonly used and machine-readable format (data portability).

- You can always lodge a complaint with a data protection supervisory authority, e.g. Datatilsynet in Denmark.

You can exercise your rights by contacting us via <https://gdpr.semler.dk> and you can withdraw your consent by contacting us at the contact details mentioned above.

There may be conditions or limitations to these rights. It is therefore not certain that you have the right to data portability in the specific case - this depends on the specific circumstances of the processing activities.

Last updated: February 28, 2025