

# Privacy Policy

Forsikringselskabet Dansk Sundhedssikring A/S (“Dansk Sundhedssikring”, “we”, “us” or “our”) prioritises confidentiality and data security very highly. This privacy policy applies to our processing of personal data in connection with the provision of insurance. The privacy policy gives you the information you are entitled to according to the applicable data protection legislation.

## 1. Data Controller and contact details

Forsikringselskabet Dansk Sundhedssikring A/S is the Data Controller for the processing of your personal data when you are or have been covered by an insurance with us.

Our contact details are:

### Data Controller

Forsikringselskabet Dansk Sundhedssikring A/S

Company number: 34 73 93 07

Hørkær 12B

2730 Herlev

Phone: +45 70 20 61 21

E-mail: [driftsstyring@ds-sundhed.dk](mailto:driftsstyring@ds-sundhed.dk)

### DPO (Data Protection Officer)

Under the general data protection regulation, we are required to have a DPO (Data Protection Officer). You can contact our DPO via email at [databeskyttelsesraadgiver@ds-sundhed.dk](mailto:databeskyttelsesraadgiver@ds-sundhed.dk). We strongly recommend that you do not send sensitive or confidential information via email.

## 2. How we process your personal data

Insurance Policy holders and insured by Forsikringselskabet Dansk Sundhedssikring A/S		
For what purposes are personal data used?	Types of personal data	What is the legal basis for processing?
<b>Administration of insurance</b>  When you are covered by an insurance with us, we register your basic details in our systems, so that we can see that you are insured by us. We can then identify you and ensure that you are able to make a claim with us.	<b>General personal data</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• E-mail address</li><li>• Telephone number</li><li>• Workplace</li><li>• Employee group</li><li>• Payroll number</li><li>• Policy number</li><li>• Age</li></ul>	<u>GDPR art. 6 (1)(b) (performance of a contract):</u> To be able to deliver the services regulated in the contract we have entered into with either you or your employer, it is necessary for us to process your personal data.  <u>The Danish Data Protection Act's section 11 (2), number 1:</u> In

<p>Topdanmark promotes insurances for Dansk Sundhedssikring. Your personal data is collected by Topdanmark and passed on to Dansk Sundhedssikring, thus we can manage your insurance agreement. If you want to report a claim, please contact Dansk Sundhedssikring.</p>	<ul style="list-style-type: none"> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number</li> </ul>	<p>accordance with the Danish Insurance Business Act section 69, we process your CPR-number with the purpose of unambiguous identification of you when administrating your insurance.</p>
<p><b>Collection of health information prior to signing of insurance “Critical Disease”</b></p>	<p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information in the form of mental or physical disorders.</li> </ul>	<p><u>GDPR art. 6 (1)(b) (performance of a contract):</u> To be able to take steps prior to entering the contract (the insurance agreement), it is necessary for us to process your personal data to be able to assess your right to coverage.</p> <p><u>GDPR art. 9 (2)(f) (legal claim):</u> The need to be able to determine your right to receive insurance coverage according to the insurance agreement you are covered by.</p>
<p><b>Claims-handling</b></p> <p>We process your personal data to be able to handle your claims and assess whether the insurance covers the claim and to what extent. Furthermore we can assess which treatment provider we can recommend for you in our external healthcare network.</p> <p>If you would rather use your own treatment provider who is not in our external healthcare network, we will send a payment guarantee directly to you, and will then not take any further action with your personal data.</p> <p>If your problem is not solved with the number of treatments we authorised in the first instance, we can ask for details on your treatment from your treatment provider. We will use those details to assess the status of the problem and your progress before we approve further treatments.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Workplace</li> <li>• Employee group</li> <li>• Payroll number</li> <li>• Policy number</li> <li>• Cover and options</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p><u>GDPR art. 6 (1)(b) (performance of a contract):</u> To be able to deliver the services regulated in the contract we have entered with either you or your employer, it is necessary for us to process your personal data.</p> <p><u>GDPR art. 9 (2)(f) (legal claim):</u> The need to be able to determine your right to receive insurance coverage according to the insurance agreement you are covered by.</p> <p><u>Data Protection Act section 11 (2) number 1:</u> In accordance with the the Danish Insurance Business Act section 69, we process your CPR-number with the purpose of unambiguous identification of you when administrating your insurance.</p>

<p><b>Transfer to external professional treatment providers and pension companies.</b></p> <p>If a treatment is to be investigated or you wish to receive treatment in our external network of healthcare treatment providers, we will send your personal data to the relevant treatment provider.</p> <p>If you are covered by a mandatory provision of early action in the event of a risk of loss of the ability to work, we can transfer your personal data to your pension company with your consent.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Payment guarantee number</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number</li> <li>•</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p><u>GDPR art. 6 (1)(a) (consent):</u> We transfer your general personal data with your consent.</p> <p><u>GDPR art. 9 (2)(a) (consent) and the Data Protection Act section 11 (2) number 4:</u> We transfer your CPR number and health data with your consent.</p>
<p><b>Telephone therapeutic conversations</b></p> <p>We can offer you therapeutic conversations/mentoring sessions, where your personal data will be processed by our psychotherapists.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Telephone number</li> <li>• Age</li> <li>• Sex</li> <li>• Date of birth</li> <li>• Payment guarantee number</li> <li>• ClaimID</li> <li>• Date of treatment</li> <li>• CPR number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p><u>Article 6(1)(b) of the General Data Protection Regulation (performance of contract):</u> In order to be able to fulfil the contract that either you or your employer has entered into with us, we need to process your personal data so that we can see that you have an insurance policy with us and have the opportunity to identify yourself. This is necessary for you to report a claim with us.</p> <p><u>Article 9(2)(f) of the General Data Protection Regulation (legal claims):</u> We process your health data to assess whether you are entitled to have the case covered.</p>
<p><b>Emergency crisis assistance</b></p> <p>If you are exposed to an event or incident that subsequently requires emergency crisis assistance, and are covered by your health insurance, we can initiate the treatment and disclose your personal data to relevant treatment providers without your consent.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Payment guarantee number</li> <li>• Policy number</li> <li>• Cover and options</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number</li> </ul>	<p><u>GDPR art. 6 (1)(d) (vital interest):</u></p> <p><u>GDPR art. 9 (2)(c) (vital interest):</u></p> <p>In the event of a situation that requires acute crisis help, we have found that there can be vital consequences for you and your health if you do not receive treatment as fast as possible.</p>

	<p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	
<p><b>Communication and service notifications</b></p> <p>Physical or digital communication, including service notifications via letter, e-mail, SMS, e-Boks, Mit.dk or via our customer portal My DSS.</p> <p>Have you purchased an insurance via phone, we will send you a confirmation of our agreement via e-mail.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• CPR number</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests)</u>: We have a legitimate interest in processing your general personal data, to communicate with you on your insurance, your claims and changes to your insurance. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p> <p><u>Data Protection Act section 11 (2) number 1</u>: In accordance with the the Danish Insurance Business Act section 69, we process your CPR-number with the purpose of unambiguous identification of you when administrating your insurance.</p>
<p><b>Legal obligations and legal claims, including complaints</b></p> <p>To comply with our legal obligations, and to be able to establish, exercise or defend legal claims.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Workplace</li> <li>• Policy number</li> <li>• Cover and options</li> <li>• Payment guarantee number</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number</li> <li>• Other relevant details used to comply with a legal obligation or for the purposes of a legal claim</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>GDPR art. 6 (1)(c) (legal obligation) cf. Executive Order on complaint responsibility and the handling of complaints by financial undertakings, Section 4.</p> <p>GDPR art. 9 (2)(f) (legal claim)</p> <p><u>Data Protection Act section 11 (2) number 1</u>: In accordance with the the Danish Insurance Business Act section 69, we process your CPR-number with the purpose of unambiguous identification of you when administrating your insurance.</p>
<p><b>Early action in the event of risk for loss of earning capacity hert</b></p> <p>If you have health insurance with us through your pension company and</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> </ul>	<p><u>GDPR art. 6 (1)(b) (performance of a contract)</u>: To be able to deliver the services regulated in the contract we have entered with either you or your employer, it is</p>

<p>are covered by a mandatory provision of early action in the event of risk of loss of earning capacity, we analyse your data to determine whether you are at risk of losing your earning capacity.</p>	<ul style="list-style-type: none"> <li>• Telephone number</li> <li>• Cover and options</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>necessary for us to process your personal data.</p> <p>GDPR art. 9 (2)(f) (legal claim)</p>
<p><b>Recording of telephone calls for documentation purposes</b></p> <p>When you contact our Healthcare Team, we automatically record the phone calls. We do this to assess whether the case is covered and to be able to document what has been stated during the case and what has been agreed with you.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Telephone number</li> <li>• CPR number</li> <li>• The other content of the conversation</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p><u>Article 6(1)(b) of the General Data Protection Regulation (performance of contract)</u>: In order to be able to fulfil the contract that either you or your employer has entered into with us, we need to process your personal data so that we can see that you have an insurance policy with us and have the opportunity to identify yourself in connection with the use of your insurance.</p> <p><u>Article 9(2)(f) of the General Data Protection Regulation (legal claims)</u>: We process your health data to assess whether you are entitled to have the case covered.</p>
<p><b>Recording of phone calls for improving our service and quality</b></p> <p>We record phone calls for the use of improving our service and quality with your consent.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Telephone number</li> <li>• CPR number</li> <li>• The other content of the conversation</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p><u>GDPR art. 6 (1)(a) (consent)</u>: We record and use the recorded phone-calls for the mentioned purposes with your consent.</p> <p><u>GDPR art. 9 (2)(a) (consent)</u>: We record and use the recorded phone-calls for the mentioned purposes with your consent.</p>
<p><b>Online webinars</b></p> <p>Dansk Sundhedssikring offers online webinars regarding various topics, which are voluntary to participate in.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• E-mail</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests)</u>: We have a legitimate interest in processing your general personal data, to be able to provide access to the webinar-platform. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p>

<p><b>Reporting to public authorities and legal obligations</b></p> <p>According to the law, we are obliged as an insurance company to perform a number of analyses of claims received and cover approved. The results of such analyses are reported to the authorities in anonymised format.</p> <p>We can also use personal data if we have to respond to specific enquiries from the public authorities.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Case number</li> <li>• Invoice number</li> <li>• Treatment date</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>GDPR art. 6 (1)(c) (legal obligation)</p> <p>GDPR art. 9 (2)(f) (legal claim)</p>
<p><b>Business Intelligence, customer and product analyses</b></p> <p>Dansk Sundhedssikring compiles statistics and analyses via Business Intelligence (BI) to quality-assure and improve existing and develop new products and services and to perform anonymous reporting to our customers and business partners.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Phone number</li> <li>• Case number</li> <li>• Invoice number</li> <li>• Treatment date</li> <li>• Type of treatment</li> </ul>	<p><u>Article 6(1)(f) of the General Data Protection Regulation (balancing of interests)</u>: We have a legitimate legitimate interest in processing your general personal data in order to carry out statistics and analyses. We assess that this interest outweighs your interest in not processing your personal data.</p>
<p><b>Satisfaction and effect surveys</b></p> <p>We regularly conduct customer satisfaction and effect surveys. We do so by sending you links after you have been in contact with us and in partnership with one of our data processors, to our online customer satisfaction and effect measurement forms, which you can opt to respond to.</p> <p>Customer satisfaction and effect measurement surveys are voluntary.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Case number</li> <li>• Invoice number</li> <li>• Treatment date</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests)</u>: We have a legitimate interest in processing your general personal data, to analyse your responses on your satisfaction with your insurance. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p> <p><u>GDPR art. 9 (2)(a) (consent)</u></p>
<p><b>Invoicing, bookkeeping, accounts, financial calculations and pricing</b></p> <p>To invoice, bookkeep and keep accounts, and to calculate financial reserves, including our underwriting processes etc.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Case number</li> <li>• Invoice number</li> <li>• Treatment date</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>GDPR art. 6 (1)(b) (fulfilment of contract).</p> <p>GDPR art. 6 (1)(c) (legal obligation) cf. the Danish Bookkeeping Act and accounting legislation.</p> <p>GDPR art. 9 (2)(f) (legal claim)</p>

<p><b>Regress from Sygeforsikring “Danmark”</b></p> <p>If we have covered an insurance-claim, which is also covered by an insurance at Sygeforsikringen “Danmark”, we seek regress in the insurance-amount, which you are entitled to with “Danmark”.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Membership group-number</li> <li>• Payment guarantee number</li> <li>• CPR-number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests)</u>: We have a legitimate interest in processing your general personal data, to seek regress at “Danmark”. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p> <p>GDPR art. 9 (2)(f) (legal claim)</p> <p><u>The Danish Data Protection Act’s section 11 (2), number 1</u>: In accordance with the Danish Insurance Business Act section 69, we process your CPR-number with the purpose of unambiguous identification of you when administrating your insurance.</p>
<p><b>Transfer to sister companies</b></p> <p>When we perform administrative and financial analysis work for our sister companies PrimaCare A/S and DSS Hälsa AB, we use Dansk Sundhedssikring’s own personal data in the process, to be able to compare our data with those we receive from them.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Payment guarantee number</li> <li>• Policy number</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests)</u>: We have a legitimate interest in processing your general personal data, to be able to perform financial analyses for other members of our group. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p>
<p><b>Transfer to insurance brokers</b></p> <p>If your insurance was taken out through an insurance broker, we will disclose your personal data to the broker when necessary.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Workplace</li> <li>• Employee group</li> <li>• Payroll number</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number</li> </ul>	<p><u>GDPR art. 6 (1)(b) (performance of a contract)</u>: To be able to deliver the services regulated in the contract we have entered into with either you or your employer, it is necessary for us to process your personal data.</p> <p><u>GDPR art. 9 (2)(f) (legal claim) and the Danish Data Protection Act’s Section 7 (1)</u>: The need to be able to determine your right to receive insurance products according to the insurance agreement you are covered by.</p>

<p><b>Disclosure of data to Topdanmark Forsikring – business customers</b></p> <p>We disclose general data to Topdanmark Forsikring for the purpose of marketing of Topdanmark’s products.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Company name, CVR number, telephone number and information about the insurance broker (if one is affiliated with the company)</li> </ul>	<p><u>Section 85(3) of the Insurance Business Act</u>: Disclosure of personal data about business customers to Topdanmark Forsikring.</p> <p>The information will not be disclosed if the company has indicated to Dansk Sundhedssikring that the company does not want information to be disclosed for marketing purposes, or if the company otherwise generally does not want to be contacted for marketing purposes.</p> <p><u>Article 6(1)(f) of the General Data Protection Regulation (balancing of interests)</u>: We have a legitimate legitimate interest in disclosing information about whether a business customer is represented by an insurance broker, so that communication with the customer can go through the insurance broker.</p>
<p><b>Digital advertising, including newsletters</b></p> <p>Dansk Sundhedssikring may send you advertising material, including newsletters containing news about our products, services and advice regarding health.</p> <p>The advertising can be send by e-mail or our platform My DSS.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• E-mail address</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests)</u>: We have a legitimate interest in processing your general personal data, to be able to send you our newsletters. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p> <p>However, we always ensure to collect your advertising-consent prior to us sending the newsletters.</p>
<p><b>Profiling for the use in advertisement and canvassing</b></p> <p>We may use the information we possess about you to conduct profiling for the purpose of assessing which insurance products that are most relevant for you in connection with our sales enquiry.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address and postal number</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Employee group</li> <li>• Age</li> <li>• Gender</li> <li>• Business</li> <li>• Product and service preferences</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests)</u>: We have a legitimate interest in processing your general personal data, to be able to make all sales-enquiries from us as relevant as possible. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p>

<p>We use your CPR number to investigate whether you are registered at the “Robinson-list” and therefore do not wish to be contacted for advertising or canvas-purposes.</p>	<ul style="list-style-type: none"> <li>• CPR number</li> </ul>	<p><u>The Danish Data Protection Act’s Section 11 (2), no. 1 (legal requirement)</u>: According to the Danish Marketing Act Section 10 (4), we are obligated to check whether the persons we plan to contact by phone, have registered that they do not wish to be contacted for advertising or sales purposes.</p>
<p><b>Test of systems in connection with development</b></p> <p>Dansk Sundhedssikring may use your personal data for testing our systems, when we have conducted development of them, to ensure everything works as it should.</p> <p>Our test environments are subject to the same security as our production environments.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail address</li> <li>• Telephone number</li> <li>• Workplace</li> <li>• Employee group</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR number (confidential personal data)</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>Dansk Sundhedssikring process your personal data for test and development of our systems with the same legal basis as stated above.</p>
<p><b>Anonymisation</b></p> <p>Dansk Sundhedssikring can anonymise your personal data for the purposes of marketing, development of products and services, machine learning, compilation of statistics, and for sharing, reporting to your employer, sales and publication of completely anonymous data. Your data will be anonymised according to our internal anonymising rules.</p>	<p>The data protection rules do not apply to anonymous data.</p>	<p>The data protection rules do not apply to anonymous data.</p>

**Contact personnel at external treatment providers or external treatment providers in the form of sole trader businesses**

For what purposes are personal data used?	For what purposes are personal data used?	For what purposes are personal data used?
<p><b>Comply with collaboration agreement</b></p> <p>Dansk Sundhedssikring processes your personal data with to register your health clinic or treatment location in our network database of approved treatment providers, and subsequently to comply with the collaboration agreement.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone number</li> <li>• Type of processing offered</li> <li>• Contract details</li> </ul>	<p><u>GDPR art. 6 (1)(b) (fulfilment of contract).</u></p>
<p><b>Invoicing, bookkeeping and accounts</b></p> <p>To invoice, bookkeep and compile accounts.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone number</li> <li>• Invoice</li> <li>• Payment details</li> </ul>	<p><u>GDPR art. 6 (1)(b) (fulfilment of contract).</u></p> <p><u>GDPR art. 6 (1)(c) (legal obligation) cf. the Danish Bookkeeping Act and accounting legislation.</u></p>
<p><b>Satisfaction and effect surveys</b></p> <p>Dansk Sundhedssikring issues satisfaction surveys after receiving treatment, to get feedback on your treatment.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Details of customer satisfaction with your treatment</li> </ul>	<p><u>GDPR art. 6 (1)(f) (weighing of interests):</u> We have a legitimate interest in processing your general personal data, to issue and receive responses to satisfaction and effect surveys, to be able to improve our own products and services, along with Dansk Sundhedssikring's network of external and our own healthcare treatment providers. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p>
<p><b>Legal claim</b></p> <p>To comply with our legal obligations, and to be able to determine, defend and make legal claims applicable.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone number</li> <li>• Type of processing offered</li> <li>• Contract details</li> <li>• Correspondence</li> </ul>	<p><u>GDPR art. 6 (1)(c)(legal obligation).</u></p> <p><u>GDPR art. 6 (1)(f) (weighing of interests):</u> We have a legitimate interest in processing your general personal data, to apply or defend a legal claim. We believe this interest exceeds consideration for your interest in us not processing your personal data.</p>

## 2.2 About your ability to influence our legal basis

### Withdrawal of consent

You can withdraw your consent to the processing activities for which we use your consent as legal basis at any time.

If you do want to withdraw your consent, log in to your profile on My DSS, where you can find the option for withdrawal at the same place as you gave it. If you withdraw your consent, we will no longer process your personal data based on that consent. Withdrawal will not affect the legality of our processing of personal data from the point in time when consent was given, up to it being withdrawn.

### Objecting to weighing of interests

If you want to object to one or more processing activities we base on a legitimate interest as described above, you can contact us either via our customer portal My-DSS or by e-mail to [driftsstyring@ds-sundhed.dk](mailto:driftsstyring@ds-sundhed.dk), where you can put forward your objection against the specific processing. We will then consider whether your objection is justified, and whether the processing ought to be stopped on that basis.

## 2.3 Where do we get your personal data from?

When you take out an insurance with us, we receive your personal either from yourself, from your employer, or from your employer's insurance broker or from Topdanmark as an insurance broker, if the insurance-agreement has been entered through them.

We also receive details from you when you report a claim to us or change your details in your profile at My DSS. If the insurance claim is made by a third party, we receive information from the claimant.

If you are covered by an insurance as co-insured, the details we have on you come from your family member who is the main insured.

We also receive details from the public authorities, including Det Centrale Personregister (CPR register).

If you are in a treatment regime via us, we can receive details on your current treatment from your treatment provider.

If you review us on Trustpilot, we may receive the information you publish about yourself in the review, from Trustpilot.

## 3. Recipients of personal data

As a financial company, we are subject to duty of confidentiality under the Danish Insurance Business Act. Therefore, we process your data as confidential, and we only disclose data to others if legal. This could e.g. be based on consent or in accordance with legislation.

To fulfil the above-mentioned purposes, Dansk Sundhedssikring can also give your personal data to third parties who provide relevant services on the basis of a contractual relationship with Dansk Sundhedssikring.

Data is only disclosed when necessary in relation to the purpose.

### Data processors

Certain suppliers will only process personal data in accordance with our instructions according to our data processing agreements. Dansk Sundhedssikring currently uses the following data processors, or categories of data processors:

- a. IT suppliers for operation
- b. IT suppliers for compliance and security
- c. IT supplier of artificial intelligence, including transcription and storage of recorded phone-calls.
- d. IT consultancies for development of our IT-systems
- e. Suppliers of call centre services
- f. PrimaCare A/S is a group member, which supplies an external network of healthcare treatment providers, in the form of psychologists, physiotherapists, chiropractors and masseurs.
- g. Supplier of online doctor services.
- h. Further Underwriting International S.L.U. who will maintain the case handling of our claims within the product: Critical Disease and Cancer Care.

### **Independent Data Controllers**

In certain instances, it will also be necessary to disclose your personal data to independent Data Controllers. The following categories of recipients are involved on the basis of the following legal basis:

- a. Law offices, accountants, courts and public authorities receive general, confidential (CPR-number) and sensitive personal data on the basis of our legitimate interest in being able to determine, defend and make legal claims (GDPR article 6 (1)(f) (general personal data), GDPR article 9 (2)(f) (health data) and the Danish Data Protection Act's Section 11 (2), no. 2, no. 4 cf. GDPR article 9 (2)(f) (CPR numbers)).
- b. Pension companies receive general, confidential (CPR-number) and sensitive personal data on the basis of the following legal basis (consent according to GDPR article 6 (1)(a) (general personal data), article 9 (2)(a) (sensitive personal data) and the Danish Data Protection Act's Section 11 (2), no. 2 (CPR number)). We refer to the table above.
- c. Insurance brokers receive general and confidential (CPR-number) on the basis of the following legal basis (GDPR article 6 (1)(f) (general personal data), and the Danish Data Protection Act's Section 11 (2), no. 4 cf. GDPR article 9 (2)(f) (CPR numbers)). If you provide a separate consent, insurance brokers may also receive data regarding your insurance claims on the basis of GDPR article 9 (2)(a) (consent).
- d. External health clinics and treatment providers approved as part of either Dansk Sundhedssikring's or PrimaCares network of treatment providers receive general, confidential (CPR-number) and sensitive personal data on the basis of the following legal basis (consent according to GDPR article 6 (1)(a) (general personal data), article 9 (2)(a) (sensitive personal data), the Danish Data Protection Act's Section 11 (2), no. 2 and the Danish Insurance Business Act section 69.
- e. The debt collection company, which Dansk Sundhedssikring cooperates with, receive general, confidential (CPR-number) personal data for the use of debt collection activities on behalf of Dansk Sundhedssikring. We transfer the personal data on the basis of our legitimate interest in being able to determine, defend and make legal claims (GDPR article 6 (1)(f) (general personal data) and the Danish Data Protection Act's Section 11 (2), no. 4 cf. GDPR article 9 (2)(f) (CPR numbers).

### **Third Country Transfer (transfer of personal data outside of EU/EEA)**

Dansk Sundhedssikring may transfer personal data outside EU/EEA in the following cases:

- a. Dansk Sundhedssikring use the supplier Microsoft for a number of services and even though Dansk Sundhedssikring have chosen that all data must be stored in EU via European data centers, there is a risk that the personal data is transferred to especially USA, which is a third country. The risk exists because the mother company of Microsoft Ireland (Microsoft Inc) on the basis of requests made by American authorities, can request Microsoft Ireland to handover personal data and due technical support from other third countries. Since the approval of the EU-U.S. Data Protection Framework in July 2023 Microsoft has certified themselves under the agreement, which means that eventual transfer of personal data to USA are fully legal.
- b. If you are covered by the product “Critical Disease” and “Cancer Care” and report a claim, which is approved to be covered, Dansk Sundhedssikring may, via our data processor Further Underwriting International S.L.U., transfer your personal data to relevant treatment providers and/or to the special “Medical Board” in relation to Cancer Care throughout the entire world and therefore outside the EU/EEA. We transfer your personal data on the basis of GDPR art. 49 (1)(a) (consent).

## 4. How long do we retain your details?

We store your personal data as long as we have a legitimate purpose with the storage, then the personal data is either deleted or anonymised.

Danish law regulates how long personal data can be retained.

Personal data that is part of the processing of your claim is stored for 10 years from the conclusion of the case.

Telephone recordings are retained for 6 months with no regards to whether the purpose is for documentation or improving services and quality.

Other personal data not directly relevant to your claim will, in principle, be retained for 5 years + current financial year.

The personal data we use for test of our systems in connection to development are deleted in our test-environment immediately after the completion of the test.

## 5. Your rights

The GDPR gives you a number of rights that you can exercise by contacting us. But please note that your rights can be limited by other Danish legislation, or can be subject to other, weightier considerations.

To exercise your rights, log in to your profile at My DSS, which you can find [here](#). You can also contact our data protection team at [driftsstyring@ds-sundhed.dk](mailto:driftsstyring@ds-sundhed.dk).

Your rights according to GDPR are:

### a. Right of access

You have the right to access to and a copy of the personal data we process on you. But there are certain exceptions.

### b. Right to rectification

You have the right to correct or update outdated or incorrect details we have registered on you.

### c. Right to erasure (the right to be forgotten)

You have the right to have your personal data erased before we would normally do so, unless Dansk Sundhedssikring is entitled or legally obliged to store your data, as a result of other legislation or ongoing complaints or court cases.

**d. Right to restrict processing of personal data**

You have the right to have the processing of your personal data restricted, unless Dansk Sundhedssikring is entitled or legally obliged to continue to process your data, according to the legislation or ongoing complaint or court cases. If you request restriction on the processing of your personal data, we will always seek to restrict processing as much as possible.

**e. Right to object**

Your right to object to our processing of your personal data on the basis of weighing of interests according to GDPR art. 6 (1), letter f is described in more detail in item 2.2. of the privacy policy.

**f. Right to data portability**

You have the right to a copy of the personal data you have given us. The copy must be in a structured, commonly used and machine-readable format. In certain instances, you also have the right to ask us to transmit your data to another Data Controller.

## 6. Security

We protect the confidentiality, integrity and accessibility of your personal data. We have therefore implemented security precautions to ensure that our internal procedures fulfil the security standards and legal requirements laid down. All our personal data are stored and transmitted encrypted, in accordance with the Danish Data Protection Agency's guidelines. You can also log in with confidence to our customer portal, My DSS via MitID, where you can see your personal data and communicate with us concerning your cases.

Dansk Sundhedssikring has also compiled and implemented its own internal rules on information security, which include instructions and precautions to protect your personal data against destruction, loss, amendment, unauthorised publication, and against any unauthorised third parties gaining access to or knowledge of them. Our healthcare personnel are subject to statutory confidentiality.

## 7. Cookies

When you visit our website, various data might be collected, including your user behaviour, IP-address, browser-type etc.

Cookies for the use of statistics, preferences and advertising are processed on the legal basis of GDPR article 6 (1), letter a (consent).

You can read more about cookies, the purposes for which they are placed and withdraw your cookie-consent [here](#).

We use different suppliers, who can receive your personal via cookies:

- Cookiebot
- Piwik Pro
- LinkedIn

## **8. Questions and complaints**

If you have any questions or wish to make a complaint about our processing of your personal data, please contact our Data Protection Officer/DPO at [databeskyttelsraadgiver@ds-sundhed.dk](mailto:databeskyttelsraadgiver@ds-sundhed.dk).

You can also complain about Dansk Sundhedssikring's processing of your personal data direct to the Danish Data Protection Agency, at Carl Jacobsens Vej 35, 2500 Valby. Tel. 33 19 32 00, e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk) or via their website [www.datatilsynet.dk](http://www.datatilsynet.dk).

## **9. Changes to the privacy policy**

This data protection policy does not represent an agreement between Dansk Sundhedssikring and you, but does form the basis for Dansk Sundhedssikring's duty to inform according to data protection law. We reserve the right to make changes to the data protection policy from time to time, in accordance with the data protection legislation in force at any time. In the event of any changes, the date at the bottom of the data protection policy will be changed. The data protection policy in effect at any time will be available on our website.

Revision date: April 29th 2025