

JBF's Privacy Policy

In your interactions with Jydsk Barberblade-Fabrik A/S (JBF), you trust us with your personal data. It is important for us to respect your right to privacy, and ensure the safety of your data, as well as assure you that JBF is compliant with EU's General Data Protection Regulation (GDPR), which is effective as of 25 May 2018.

This privacy policy outlines how JBF manages the collection, use, disclosure, and handling of, or otherwise processes the personal data of its customers, the personnel of customers, visitors to JBF's website or premises, JBF's suppliers and dealers, and others with whom JBF deals.

1 Data controller

JBF is the data controller for personal data that we collect from you or you provide to us. If you have any questions, or would like further information, you are welcome to contact us using the information below.

Jydsk Barberblade-Fabrik A/S
Mineralvej 19
DK-9220 Aalborg Øst
Denmark

CVR: 77039015 Export CVR 87387852

Phone no.: +45 98 12 33 77

E-mail: jbf@jbf.dk

Website: www.jbf.com

2 The purpose and legal basis for the processing of your personal data

To enable us to fulfil our responsibilities as a manufacturer and seller of window scrapers, blades, industrial blades, and related products and services, JBF collects personal data about you, in order to effectively and efficiently conduct our businesses.

You are not required to supply any of the personal data that we may request. However, if the personal data we request is not provided, we may not be able to provide products and support in the most effective or efficient manner, or at all, or you may not be able to become a dealer for JBF.

We generally collect personal data directly from you in person, in writing, by telephone, e-mail, or via our website, or receiving your business card or similar.

We will only collect data to the extent that it is required for the specific purposes set out in this policy or notified to you at the time of collection.

JBF collects and uses personal information for the following reasons:

2.1 Customer, dealer and supplier relations

We receive or collect information about you from you or another party during the course of business. This may include:

- When you order any products and/or services

- Whenever you contact us or respond to our communications (e.g. e-mail, telephone, correspondence in writing)
- When you request information about our products or services, request support, or complete surveys
- When you meet us offline, at your own premises or ours, or at a trade fair
- When you provide us with a business card or similar
- If we have a business relationship with the organisation that you represent, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the relationship
- From third party data providers or publically available sources for anti-money laundering, background checking or similar purposes, and to protect our business and comply with our legal and regulatory obligations

Typically, the following personal data will be saved:

- Your name, your professional e-mail, your professional phone numbers, your professional role and your role in the buyer-supplier relationship
- Information relating to your business relationship with JBF, including previous products, services and support provided by JBF to you

We generally process this information in order to:

- To handle any orders for product and services, you place with us
- To arrange for shipping of goods
- To provide you with support in relation to the products and services you request from us
- To process transactions and send notices to you about your transactions
- To resolve disputes, collect fees, and troubleshoot problems
- To operate, manage, develop, and promote our business and, in particular, our relationship with the organisation you represent and related transactions
- To notify you about changes to our products, services or support
- To facilitate distribution of corporate communications that is relevant to the promotion and reporting of our business activities
- To protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial material and other financial or business crimes; and
- To comply with our legal and regulatory obligations and bring and defend legal claims

This processing may involve sharing your personal data with:

- Your colleagues within the organisation you represent
- Our data processors
- Selected third parties, such as:
 - Shipping companies
 - Other business partners, suppliers, and subcontractors for the performance of any contract we enter into with them or you
 - Our IT and internet service providers
- In exceptional circumstances:

- To competent regulatory, prosecuting and other governmental agencies or litigation counterparties in any country or territory
- Where we are required by law to disclose

We process this data in part to fulfil our contractual obligations towards you and the company you represent (GDPR art. 6, pt. 1, sch. b) as well as our obligations to (LAW; GDPR art. 6 pt. 1, sch. c), and in part in accordance with the rule of legitimate interest in GDPR (art. 6, pt. 1 sch. f) The legitimate interests, which justifies the processing, are that JBF generally conducts business with other companies, and in order to do this, the order information and other related communications are needed regardless of the employees who provided them and thereby the personal data attached. Other interests may include maintain, providing, and enhancing our products, services, and support.

2.2 Google Analytics

In order to better understand (1) how many people use our website, (2) how they find and use the webpages, and (3) how they otherwise use the website, we use Google Analytics to track the interaction between users and our website.

Google Analytics collects and processes data such as:

- Geographical location
- Device
- Internet browser
- Operating system
- IP-address

While these could be used to identify you, Google does not allow us access to this information.

Google Analytics uses cookies for their purposes, details of which can be found on Google's developer guides (link: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>)

Disabling cookies on your internet browser will stop Google Analytics from tracking any part of your visit to pages within this website. Read more about this in our '**Cookie Standard**' below this Privacy Policy.

Google is considered a third party processor residing outside the EU/EEA area. Read more about this in the section '**Transfers to recipients in third countries**'.

2.3 'Contact' and 'Become a dealer' forms

If you choose to use our 'Contact' form (link: <http://www.jbf.dk/en/contact/contact-info>) or 'Become a dealer' form (link: <http://www.jbf.dk/en/become-a-dealer>), your information will be stored in our backend and collated into an e-mail and sent to us.

By filling out the forms, we will receive your name, professional phone number, and professional e-mail address.

We use this data to respond to your request in an effective and efficient manner, and depending on your request we may save your data, i.e. if you become a dealer of JBF's products. In this case, please refer to the sections '**Customer and dealer relations**' and '**Supplier relations**' as applicable.

We process this data in order to take steps at the request of the data subject prior to entering into a contract in accordance with the GDPR (art. 6, pt. 1, sch. b).

2.4 E-mail newsletter

If you decide to join our e-mail newsletter, we will receive the e-mail address and other information that you choose to submit to us (such as your name, professional phone number, etc.).

We will use this information to send the newsletter to you, and to the extent possible, make sure the news and information are relevant to you.

Information about your use of the newsletter – i.e. whether it is opened, for how long it is opened, when the e-mail newsletter is deleted, and whether any links have been use – is collected by the IT-system in an anonymous form. This information is used to improve our service in order to further provide relevant information targeted and adapted to the recipients interest.

We process this data in accordance with the rule of consent in the GDPR (art. 6, pt. 1 sch. a) and the rule of legitimate interest (GDPR, art. 6, pt. 1, sch. f), where our interest lies in optimising future e-mail newsletter and related marketing campaigns.

You have the right to withdraw your consent at any time. You can do this by contacting us using the information provided above in section 1.

If you choose to withdraw your consent, it will not affect the legality of our processing of your personal data in accordance with your previously declared consent and up to the time of withdrawal. If you withdraw your consent, it therefore only takes affect from the time of withdrawal.

2.5 Website cookies

When you visit our website, we may use ‘cookies’ to assign your device a user ID.

A cookie is a small piece of information that is sent to your browser and stored on your computer’s hard drive. Cookies contain information that allows us to identify your device, understand your use of our website and set your preferences for future visits.

We may use this information to determine whether or not to display standard content. You can configure your browser to notify you when you receive a cookie, or disable cookies altogether. Please refer to our **‘Cookie Standard’** below for further information about the use of cookies and how to enable them and disable them. These cookies expire when your browser window is closed.

Please note that some of the cookies we use are essential for our website to operate, and that if you disable cookies altogether, you will not be able to use all parts of our website.

We treat information collected by cookies and other technologies as non-personal information.

3 Categories of personal data

The personal data JBF processes about you fall into the following categories:

- Identification information (i.e. your name etc.)
- Demographics (i.e. your stated geographic location etc.)
- Behaviour (i.e. your online behaviour on our website)
- Social network (i.e. your colleagues at the organisation you represent)

- Personal communication (i.e. the e-mail correspondence you have with JBF)
- Employment information (i.e. position, professional phone number, professional e-mail etc.)

You can find more precise information in the applicable sections above.

The personal data we process about you entirely consists of regular personal data, i.e. not sensitive data, data concerning criminal convictions or offences, or special categories (such as national security identification numbers).

4 Recipients of personal data

We may share your information with the following categories of recipients:

- Your colleagues within the organisation you represent
- Our data processors
- Shipping companies, by agreement with you or the organisation you represent
- Our IT and internet providers
- Our financial and legal advisors
- The police
- Other public authorities in order to comply with applicable law or legal cases

More precise information can be found in the applicable sections above.

We do not share your information with any third parties for their own marketing purposes and we do not send e-mails on behalf of third parties.

5 Transfer to recipients in third countries

As mentioned in the section '**Google Analytics**' and '**E-mail newsletter**', we use Google and MailChimp in order to have our website and newsletters working efficiently and effectively, and to enhance these based on the data we receive.

Both of these organisations are located in USA, and therefore outside the EU/EEA area. Both Google LLC and The Rocket Science Group LLC d/b/a MailChimp are on the EU-U.S. Privacy Shield List (see more here (link: <https://www.privacyshield.gov/list>)). They have also both covered the GDPR rules in their own privacy notices which can be found for Google here: (link: <https://policies.google.com/privacy?hl=en-GB&>) for MailChimp here: (link: <https://mailchimp.com/legal/privacy/>).

6 Storing your personal data

We will retain your personal information for the period necessary to fulfil the purposes outlined above, or in separate consent forms.

When contacting us using the 'Become a dealer' form, your information will be stored for the duration of the processing of the enquiry and the subsequent three (3) years, in order to

If you become or already are a dealer, customer, or supplier, your information will be saved for the entire supplier-buyer relationship and the subsequent five (5) years to comply with the Danish Bookkeeping Act.

When consenting to receive e-mail newsletters, your information will be saved until you withdraw your consent. This can be done at any time by contacting us using the information provided in section 1 above.

We strive to delete personal information, as soon as their purpose have been served, unless other legal, contractual, or other obligations require us to keep the longer.

If any information technically cannot be completely erased, we will implement suitable measures to prevent any further processing of this information.

7 Your rights

Under the General Data Protection Regulation, you have some rights in regards to our processing of your personal information. The rights available to you depend on our reason for processing your information.

If you wish to act on any of these rights, please contact us using the information provided in section 1. We have one month to respond to you in this regard.

7.1 Your right of access

You have to right to ask us for copies of your personal information, as well as certain further information.

7.2 Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

7.3 Your right to erasure

In certain circumstances, you have the right to ask us to erase your personal information before the time of our general erasure procedures take effect.

7.4 Your right to restriction of processing

In certain circumstances, you have the right to ask us to restrict the processing of your information. If you have the right to restrict the processing, we can only process your information – except from storage – with your consent, with a legal basis, or to protect a person or important public interests.

7.5 Your right to object to processing

You have the right to object to our otherwise legal processing of your person data. You can also object to our processing of your information for the purposes of direct marketing.

7.6 Your right to data portability

In certain circumstances, you have the right to receive your information in a structured, commonly used, machine-readable format, as well as the right to have this data transferred from one data controller to another.

You can read more about your right in the Danish Data Protection Agency's guide to the rights of data subjects, which you can find at www.datatilsynet.dk. For information in English, please see the ICO's (The UK's Information Commissioner's Office) webpage on the matter here (link: <https://ico.org.uk/your-data-matters/>).

8 Complaints

If you have any questions, concerns, or complaints regarding this Privacy Policy or JBF's data processing, please contact us:

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DK-9220 Aalborg Øst
Denmark

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E-mail: jbf@jbf.dk

Website: www.jbf.com

You have the right to submit a complaint to the Danish Data Protection Agency (in Danish: Datatilsynet), if you are unsatisfied with the way JBF treats your personal information. You can find the Agency's contact information here: www.datatilsynet.dk.

If you wish to submit a complaint to another national Data Protection Agency, the list of authorities in EU member states is available at Eurojust (The European Union's Judicial Cooperation Unit) here (link: <http://www.eurojust.europa.eu/doclibrary/Eurojust-framework/jsb/jsb/EU%20Member%20State%20Authority%20Contactpoints/EU-Member-State-Authority-Contactpoints-ART19-EJDecision-EN.pdf>)

9 Updates to this Privacy Policy

JBF's Privacy Policy may be revised in order to reflect changes in our products, services, support, or in the laws applicable to JBF and you. All changes will be available on this webpage. If we make any material changes to the policy, we will then notify you on our website homepage and/or by e-mail. We will not limit your rights in this privacy policy without your express consent.

This policy was last updated 28 May 2018.