

PRIVACY POLICY

1 Introduction

1.1 This privacy notice explains how Round ApS ("we", "us", "our") processes personal data in various situations. We provide you with this information as we are required to do so under the General Data Protection Regulation (the "GDPR").

1.2 Below, please find information on the various situations where we process personal data:

- Business purposes and surveys/interviews – see section 3.2.
- Events – see section 3.3.
- Round Alumni – see section 3.4.
- Recruitment – see section 3.5.

2 Controller

2.1 Round ApS acts as a data controller for the processing of personal data in connection with the below mentioned purposes. You can find our contact details in section 9 below.

3 Description of the processing

3.1 Below, please find the specific purposes for our data processing, the categories of personal data that we process, the legal basis for such processing, and the retention periods that we have decided (in specific situations, we may defer from our general retention periods in case of e.g., complaints, objections, or other specific situations).

3.2 Business purposes and surveys/interviews

Purpose	Categories	Legal basis	Retention
<p>Communicating with you when you represent a customer, partner, supplier, or another third party, including managing and answering general inquiries.</p>	<p>Name and contact information, title, and position. The relationship to the business that you represent. The subject of your inquiry.</p>	<p>Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interests in managing business contacts and fulfilling any agreement, we may have concluded with the company you represent.</p>	<p>If there is a business relationship, we process personal data as long as the business relationship exists and up to 6 months after the end of the financial year in which the customer or supplier relationship has ended. In case of general inquiries (if no business relationship exists), we process personal data up to 15 months after the last communication.</p>
<p>Performing surveys and stakeholder interviews as part of preparing customer reports.</p>	<p>Name and contact information, title, and position. Answers to surveys and personal opinions based on stakeholder interviews. The personal data may be subject to voice recording during the specific interview, which will be specifically addressed case-by-case with a possibility to object to such recording.</p>	<p>Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interests in preparation for interviews etc. as well as collecting answers and opinions as part of performing surveys and stakeholder interviews to draft specific customer reports.</p>	<p>Up to 15 months after the report has been finalized and handed over to our customers.</p>

Bookkeeping purposes.	Information stated on invoices etc.	Article 6(1)(c) of the GDPR. For the Danish entities, the legal obligations derive from the bookkeeping legislation.	Up to 5 years after the end of the financial year in which the customer or supplier relationship has ended.
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3.3 Events

Purpose	Categories	Legal basis	Retention
Facilitating marketing events, webinars, pitch meetings, participating in industrial fairs, etc.	Name and contact information, title, and position. The relationship to the business that you represent.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interests in managing your personal data when participating in marketing events etc.	Up to 15 months after the last communication.

3.4 Round Alumni

Purpose	Categories	Legal basis	Retention
Facilitating alumni events, meetings, and other arrangements related to your former employment.	Name and contact information.	Article 6(1)(a) of the GDPR, as we ask for your consent to be part of the alumni group.	Until the consent is withdrawn or – in case we decide not to facilitate any further alumni events – up to 15 months after the last event.

3.5 Recruitment (see also [section 8 below](#))

Purpose	Categories	Legal basis	Retention
<p>Receipt of applications etc. and conducting interviews</p>	<p>As part of the recruitment process, we will receive and process the personal data that you have included in your application, CV and any other material that you may have forwarded along with your application.</p> <p>We may also ask you to send us additional information, including information about your previous employments, work assignments, skills and performance, and interpersonal skills.</p>	<p>Article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of you as a person and your skills in relation to the contents of the position.</p>	<p>If your application is rejected, we will generally delete the personal data about you when the recruitment process is completed and generally no more than 6 months after the date when you were informed of the rejection.</p> <p>If we employ you, the personal data that we have processed during the recruitment process will, if relevant, be stored in your personnel file in accordance with the applicable retention periods. In that case, you will be further notified.</p>
<p>Review of social media</p>	<p>If relevant, we will obtain available information published by you on social media, such as LinkedIn and Facebook.</p>	<p>Article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of you as a person in relation to the contents of the position.</p>	<p>See above.</p>

Processing refer- ences	If we wish to obtain references, we will first ask for your approval. Unless you are otherwise specifically notified by us, the information we obtain in that connection will include the following categories: Information about your previous employments, including information relating to work assignments, skills and performance.	Article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of your qualifications to perform a specific job function.	See above.
Use of personality tests and compe- tency tests	We may use a personality test and/or a competency test to identify your personal preferences and skills, forming a basis for a dialogue with you about your personal resources and conduct.	Article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of your personal skills based on the tests.	See above.
Review of criminal records	During the recruitment process, we may ask you to show your criminal record certificate. Whether a criminal record certificate is required depends on the position, including the responsibilities and powers involved.	No processing of personal data takes place, as you will in any case only be asked to show us a physical copy of the criminal record certificate (and you are thus not asked to send us a copy via email or otherwise provide us with a copy for us to keep).	See above.
Job interviews	If you progress in the recruitment process, we will conduct interviews	Article 6(1)(f) of the GDPR as we pursue the legitimate interest in the processing	See above.

where we will focus on your professional and personal skills etc. We will write down some of the information disclosed during the interview(s) of the personal data being necessary for our assessment of your personal skills.

Drafting of employment agreement	If we offer you a position, we will process the personal data necessary for staff administration purposes. In that case, you will receive further information on this.	The legal basis for processing personal data stated in the application documents is article 6(1)(b) of the GDPR as it is necessary to process the personal data for the purpose of drafting an employment agreement.	See above.
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4 Categories of recipients

- 4.1 We disclose your personal data to our relevant business partners, including external advisors.
- 4.2 We use data processors to store the data.

5 Transfer to third countries

- 5.1 We transfer your personal data to our data processors located in third countries. This includes the US.
- 5.2 The legal basis for our transfer is the Commission Decision of 10 July 2023 on the EU-U.S. Data Privacy Framework for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.
- 5.3 If you want additional information about our transfer of personal data to third countries, including a copy of the above-mentioned standard contractual clauses, you may make a request for such additional information by contacting us (see section 9 below).

6 Your rights

6.1 As a starting point and depending on the specific situations, you have the following rights:

- *Right to withdraw consent:* Where you have given your consent for our processing of your personal data, you have the right to withdraw your consent at any time. You can withdraw your consent by contacting us (see contact details in section 9 below). If you withdraw your consent, the withdrawal will not affect the lawfulness of processing that has already been carried out based on your consent.
- *Right of access:* You have the right to have confirmed whether collection or processing your personal data has taken place, and, if so, you have the right to request a copy of your personal data in a digital format.
- *Right of rectification:* You have the right to require that we correct any inaccurate personal data, and that we complete incomplete personal data.
- *Right of erasure:* In certain circumstances, you have the right to request that we erase personal data concerning you; for example, if it is no longer necessary for the purposes in which it was originally collected.
- *Right to restrict processing:* In certain circumstances, you have the right to request that we restrict the processing of your personal data, for example, if you believe that the personal data is not accurate or lawfully processed.
- *Right to object to the processing:* In certain circumstances, you have the right to request that we stop processing your personal data.
- *Right to data portability:* In certain circumstances, you have the right to receive the personal data you have provided us with in a structured, commonly used, machine readable format, and the right to have us transmit the data to another entity, where technically feasible.

6.2 You can read more about your rights in the Danish Data Protection Agency's guidelines on data subjects' rights, which is available at datatilsynet.dk (in Danish) and at datatilsynet.dk/english (in English). Please contact us if you wish to exercise any of your rights. The relevant contact details are [stated below](#).

7 Complaint to a supervisory authority

7.1 If you want to lodge a complaint with a supervisory authority about our processing of your personal data, you can do so by contacting the Danish Data Protection Agency via their website, www.datatilsynet.dk.

8 Mandatory processing of personal data (relevant for recruitment purposes)

- 8.1 Under the data protection rules, you are entitled to be informed of whether the provision of personal data is a statutory requirement, or a requirement necessary to enter into a contract, and of whether you are obligated to provide the personal data and of the possible consequences of failure to provide such data.
- 8.2 It should be noted in that respect that under the Danish Health Information Act, an employee must state of its own motion or at the employer's request to that effect whether the employee knows that (s)he suffers from an illness or shows symptoms of an illness which will significantly affect the employee's ability to carry out the work in question. Further, as a potential future employee, you are subject to the general duty of transfer which means that you must not knowingly withhold information that may be relevant to your opportunity for being employed. Moreover, it should be noted that if you are offered a position, we will use certain personal data about you to draft your employment agreement, including your name and address; see the provisions of the Danish Employment Contracts Act.
- 8.3 If you do not wish to provide the information that you are required to provide under the provisions of the Danish Health Information Act and/or according to your duty of transfer or the information necessary for drafting an employment agreement, or any other information which we are required to collect from you by law, we will be unable to offer you a position.

9 Contact information etc.

- 9.1 Our contact information is:

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