Data protection policy

Members, participants in the association’s activities and other stakeholders

Cf. the General Data Protection Regulation’s categorization of personal data⁠¹, Wind Denmark only manages personal information that does not belong to the category “sensitive personal data”, referred in this document as non-sensitive personal data. It’s a matter of basic identification information like name, address, information about financial affairs, customer relations or similar non-sensitive personal data. Cf. the General Data Protection Regulation’s article 4 (7) Wind Denmark takes the role as data controller by processing personal data on employees of member organizations and other stakeholders. Hence, Wind Denmark is responsible to comply with the requirements as a data controller. Among other things, these requirements comprise of:

• Valid personal data processing warrant (lawful processing)
• Compliance with the data subjects’ rights
• Obligation to report any breach of personal data security to the supervisory authority

1. Contact information of the data controller

Wind Denmark
Vodrofsvej 59, 2. sal
1900 Frederiksberg

Lysbrohøjen 24
8600 Silkeborg

CBR: 31407117
Tel.: +45 3373 0330

Mail: Danish@winddenmark.dk
Web: www.winddenmark.dk

2. Rights of the data subject

The data protection policy of Wind Denmark takes the rights of the data subjects into consideration cf. the General Data Protection Regulation’s statutory order concerning the most important rights (Chapter 3, section 2, 3 and 4 of the regulation²). This involves the following rights:

- **Right to be informed**
  You are entitled to receive information about our processing of your personal data.

- **Right to withdraw consent**
  In some cases, our processing of your personal data is based on a different legal basis than consent. To the extent that we may have obtained a consent from you for a given processing of your personal information, you are entitled to withdraw your consent at any time. You can do this by contacting us on the above contact details (see section 1).

- **Right of access**
  You are entitled to get access to the information about you that we process, as well as several additional information such as processing time, source of information, etc.

- **Right to rectification**
  You are entitled to get incorrect information about you corrected.

- **Right to erasure (‘right to be forgotten’)**
  In certain cases, you are entitled to get information about you deleted before our general deletion occurs.

- **Right to object**
  In certain cases, you are entitled object against our lawful processing of your personal information. You can also raise an objection against processing of your information for direct sales promotion.

- **Right to data portability**
  In certain cases, you have the right to receive your personal information in a structured, commonly used and machine-readable format and to transfer such personal data from one data controller to another without unnecessary impediment.

4. **Whence does Wind Denmark collect personal data?**

Wind Denmark process data that the association mainly has acquired through registration forms, participation in the association’s networks, projects and events, as well as data received directly through email correspondence or business cards handed by the data subject.

Wind Denmark process the following non-sensitive personal information on employees of the member organizations, participants in the association’s activities and other stakeholders:

- First name

5. Purpose and legal basis of managed personal data

The legal basis for our processing of your personal information is:

- When processing members' personal data, the Danish Wind Industry Association has a processing authority in point a of Article 6 (1) of the General Data Protection Regulation, as the data subject has consented to our processing of its information for one or more specific purposes.

Processed data and process purposes are as followed:

**First name and surname**
The full name of the contact person is used by the association as primary identification of contacts in the respective organizations.

**Status**
The contact person’s status state to what extent the concerned is active or has resigned from the company.

**Title**
Job title describe the contact person’s position in the respective organization. Job title is used by the association to identify relevant contacts in specific respects.

**Phone number**
If both phone numbers are provided, the association processes the contact person’s number on direct and mobile phones, respectively.

**E-mail address**
The contact person’s e-mail is being processed and applied with reference to communication regarding membership and other association-related activities.

**Primary contact**
The association registers whether a person is designated as “primary contact”, i.e. the person that handles the primary communication regarding and management of membership in the
respective member company. The member company itself can at any time designate a primary contact.

**Historical data**
The association processes historical data regarding the contact person that are relevant to this person’s and/or member company’s involvement in the association and its activities. This applies, for example, to individual purchases of sponsorship, test participation in networking groups, or when a contact person shifts from one member company to another.

**Documents**
The association processes documents, correspondence and contact-related contracts that are relevant to their and/or their company’s involvement in the association and its activities.

**Ticket orders for the association’s events**
The association processes information regarding contact persons’ ticket orders for the association’s events, network meetings and the like.

**Participation in the association’s networking- and committee groups, projects and task forces**
The association processes information regarding contact persons’ participation in networking- and committee groups as well as in projects and task forces.

**Participation in the association’s events**
The association processes information regarding contact persons’ participation in the association’s events and other association-related activities. The association uses information to conduct activities professionally, for planning, implementing and promoting future events, as well as performing follow-up questionnaire surveys.

**Subscription to the association’s newsletters and direct mails**
The association processes information regarding registration of 4 different newsletters as well as invitations to events. These are the following newsletter: Megawatt Nyt, Medlemssnyt, Market Watch and Energipolitisk Indsigt. The full name and e-mail address of the contact persons are registered for receiving the newsletters. The associations newsletters are sent out via Wind Denmark’s CRM-system. The System sends out newsletters, cf. the consent that is registered for the individual. Administration and registration of newsletters is processed in accordance with the Danish Marketing Practices Act.

6. Other stakeholders

Employees of potential member companies
Wind Denmark register and process personal information that the association’s secretariat has acquired via:

- Dialogue with employees of the potential member company
- Online registrations for the association’s events, which includes personal information on employees of the potential member company

Wind Denmark’s secretariat assesses internally whether a given organization is registered as a potential member.

Processing of personal data on employees of the potential member company takes place based on point f of Article 6 (1) of the General Data Protection Regulation. I.e. the processing is necessary for the purpose of the legitimate interests pursued by the controller or by a third

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3 Includes potential members, collaborators, suppliers and actors in the Danish Wind Industry Association’s “Sub-supplier Development Programme”
party, as it is not deemed to exceed the interests or fundamental rights of the registered. For further explanation regarding the association’s application of point f of Article 6(1), see the section: The legitimate interest. Employees of potential member companies are being registered in Wind Denmark’s CRM system.

Suppliers’ employees
With reference to suppliers’ employees, Wind Denmark processes personal data that the association’s secretariat has acquired via:

- Dialogue with employees of the particular supplier using the supplier’s services

Wind Denmark’s secretariat registers suppliers in the associations internal systems provided that the association makes use of the supplier regularly.

Processing of personal data on employees of the suppliers takes place based on point f of Article 6 (1) of the General Data Protection Regulation. I.e. the processing is necessary for the purpose of the legitimate interests pursued by the controller or by a third party, as it is not deemed to exceed the interests or fundamental rights of the registered. For further explanation regarding the association’s application of point f of Article 6(1), see the section: The legitimate interest.

Employees of suppliers are being registered in Wind Denmark’s CRM system.

Actors in the Subsupplier Development Programme
With reference to actors in the Subsupplier Development Programme, Wind Denmark processes personal information with legal basis in point c of Article 6 (1) of the General Data Protection Regulation. As an EU-funded program, Wind Denmark thus conducts legal processing of personal data related to the Subsupplier Development Programme, as it is the responsibility of the association to register and store such data.

The legitimate interest
As described above, DWIA’s processing of personal data involving employees of suppliers and collaborators, and in exceptional cases also potential members, is legally based on point f of Article 6(1). DWIA considers the interest in processing such personal data as being legitimate, since the processed data relates to persons and company in question who, in some way, collaborates with the association. Hence, there will be a mutual interest between the association and the data subject in processing these personal data in order to adequately handle the collaboration.

7. Where does Wind Denmark store personal data and who has access?

Wind Denmark stores data on member companies, their employees and other relevant stakeholders on several servers, all of which secure and operated by external suppliers (data processors). Data is stored within the EU and can only be accessed with login from Wind Denmark’s employees with personal identification information or our external suppliers. Both Wind Denmark and its external suppliers take all reasonable steps to ensure that personal data is always protected. The actual security of the associations servers is managed by external suppliers.

8. How long does Wind Denmark store personal data?

Further information can be found in the association’s complete data protection policy-document.
Cf. the General Data Protection Regulation’s principle regarding storage restraint Wind Denmark manages personal data according to the following term, unless the association can legitimize continued processing of the data in question, based on the personal data rules. As long as the data subjects are employed by member companies, they are legally registered in the association’s systems and servers. In case of termination of membership, the association keeps personal data of employees of that member organization for up to two year after termination of membership.

**Potential member companies**
The deadline for deletion or anonymization of personal data also applies to employees of potential member companies, who have not enrolled and/or used the association’s offerings during the two years in which the company and associated personal data have been registered in the association’s systems. The two-year period covers the period in which the association continues to assess that readmittance/admission of membership, and thus the retention of associated personal data, is applicable.

**Collaborators and suppliers**
The two-year period is not applicable for personal data of collaborators and suppliers. The association processes personal data on employees of collaborators and suppliers in the extent that the secretariat assesses it necessary for the daily work of the association.

**Resigned data subjects**
Provided that the secretariat receives an application for resignation, the resigned data subject will immediately be deleted from the association’s systems. If the personal data on the data subject appears in a context that is necessary for the performance of the membership, the association reserves the right to store data for that specific data subject for continued management of the company’s membership. This includes contexts such as contracts, e-mails, logs, comments, registration forms, etc.

**Wind Denmark perform two types of deletion/update of personal data:**

1. Deletion/update of personal data at year-end
2. Deletion/update of personal data continuously upon inquiry

The following personal data is being updated or deleted manually as a minimum at year-end:
- Participation in Wind Denmark’s activities, which took place for more than two years ago
- Participation in networking groups, committees, projects and task forces
- Personal data registered in the associations file server
- Personal data registered in Eventbuizz
- Personal data registered in NPS.Today
- Employees of unsubscribed member companies
- Employees of potential member companies

The following personal data is continuously updated or deleted manually:
- First name
- Surname
- Status
- Title
- Phone number
- E-mail address
- Primary contact

5 If the member company is a sole trader, both the member company and the employee are deleted
9. How long does Wind Denmark store e-mails

According to the regulation, it is Wind Denmark’s duty to ensure that personal data are only processed with a factual and legal purpose. Therefore, the association is obliged to permanently delete all personal data that no longer treats a factual or legal purpose or are no longer necessary in relation to the purpose of treatment.

All of the association employees must delete e-mails and the like containing confidential information and sensitive personal data within 90 days of dispatch/receipt.

10. How does Wind Denmark reply to request for access to personal data?

Upon request for access to personal data, Wind Denmark will respond within 90 days with an overview of the following personal data:

- Link to the associations GDPR-portal with an overview of the personal data that are stored on the person, including basic information, consents and legal basis of data processing, overview of documents, historical data and sales promotion (i.e. participation in events) and event roles
- Other personal data stored in the associations exchange- and file server
- Confirmation of whether the concerned person’s e-mail address is registered in the association’s NPS system
- Extraction from BizWizard with an overview of the ‘non-sensitive personal data’ stored on the person

Provided that the deleting basis of the regulation is met, Wind Denmark will without undue delay, respond to all inquiries regarding access to personal data and/or requests to correct and/or delete personal data, cf. the right to be forgotten (see section 2).

If access to personal data is wanted, please send an e-mail regarding this to: medlem@winddenmark.dk

11. Complaints

You are entitled to file a complaint to the Danish Data Protection Agency if you are dissatisfied with the way we process our personal information. You can find the Danish Data Protection Agency’s contact information at www.datatilsynet.dk or in the following:

Datatilsynet
Borgergade 28, 5
1300 København K