

Privacy policy

At InCommodities we understand the importance of correct processing of your personal data. We are committed to be compliant with the current regulations and this policy is developed based on the General Data Protection Regulation (GDPR).

This policy is relevant to these different groups of people:

1. Applicants
2. Employees
3. Visitors at our website www.InCommodities.com

1. Applicants

1.1 Information and purpose

We collect and process different types of information about you, in connection to the recruitment process. These include:

- Name, address, e-mail, and phone number
- Application, CV, and other materials you decide to send us
- CPR number – InCommodities do not use your CPR number in the recruitment process unless you upload it yourself in the documentation you send us. We highly recommend that you remove all CPR numbers from your documents, before uploading them to our system.

We gather this information to run an efficient recruitment process, where you as a candidate can be evaluated fairly and thoroughly.

1.2 Sources

We collect your data through our Recruitment system “HR-ON Recruit” which is an integrated part of our website. We only collect the data you voluntarily send to us.

1.3 Transfer of personal data to third parties

InCommodities will not share or distribute your personal data in connection to the recruitment process.

Your data can be accessed by our Recruitment system provider, as they act as our data



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processor, and they have sub-processors who can get access to your data as well. Both will only handle your data on behalf of InCommodities.

1.4 Transfer of personal data to other countries outside EU/EEA

InCommodities, and our data processor, do not transfer your personal data to any countries outside of the EU.

If it was ever needed to do so, both InCommodities and its' data processors, will take all necessary measures to secure the processing of your data.

1.5 Storage of your data

Your data is stored in six months unless you renew your consent for us to store it for an additional six months. When your consent expires your data will automatically be deleted. If you end the recruitment process with an employment contract, we will transfer your data to our HR-system, and the storage period hereof is therefore extended. See section 2.4.

1.6 Your rights

When you send us your data as part of the recruitment process, you become the "registered". The registered has some rights in connection to their own personal data.

These rights are:

- The right to get access to the data stored
- The right to rectify incorrect information
- The right to delete information about
- The right to limit the information
- The right to data portability
- The right to object to the processing of personal data
- The right to object to an automated, individual decision, such as profiling.

1.7 Access to the data

InCommodities as the data controller has the responsibility to protect your personal data.

Only the relevant individuals from InCommodities will have access to your data. In the



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recruitment process, this includes the HR representative connected to the job position, the hiring manager, and in some cases an employee who is part of the hiring committee.

2. Employees

2.1 Information and purpose

We collect and process different types of data about you, in connection with your employment. These include:

- Name, address, and phone number
- CPR or social security number
- Date of employment, place of work, and job title
- Previous employer and seniority
- Holiday and absence
- Sick leave
- Bank details and tax information
- Any information related to injuries or special employment
- Health information, if relevant, e.g. allergies or handicaps
- Education, qualification, courses, competence profile, development plans, and evaluations
- Personality profile
- Documentation in cases of disciplinary matters e.g. warnings
- Portrait photos

We store all your employment contracts and appendixes made over time, as well as other relevant documents in relation to the employment.

There might be situations where we will need to process other types of data than the ones listed above. In such cases, we will have your explicit consent if it is sensitive personal data or notify you if it relates to non-sensitive personal data.

We collect and process personal data for the following purposes:

- Your CPR number is collected and processed as it is required by law in relation to salary, reporting to SKAT, registration at our Pension provider, and similar.



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- Other personal data is collected and processed to ensure the necessary and relevant data in relation to your employment, as well as documentation requirements we have as an employer.

Your personal data will not be shared, distributed, or disclosed to others than the ones mentioned in the GDPR Compliance document and AEPP.

2.2 Transfer of Personal Data to third parties

InCommodities will not share or distribute your personal data in connection to your employment.

Your data can be accessed by our system providers, as they act as our data processor, and they have sub-processors who can get access to your data as well. Both will only handle your data on behalf of InCommodities.

The third-party systems where your personal data is processed includes:

- HR-ON Staff (HR system)
- Danløn (Salary system)
- Velliv Pensionsportal (Pension provider)

2.3 Transfer of personal data to recipients in other countries outside EU/EEA

InCommodities, or our data processor, do not transfer your personal data to any countries outside of the EU.

If it was ever needed to do so, both InCommodities and its' data processors, will take all necessary measures to secure the processing of your data.

2.4 Storage of your data

We store your personal data as long as you are employed at InCommodities, in order to fulfill the purposes stated above. We will only store your data if it is relevant after the employment has ended, and no longer than 5 years after the last day of employment. It might be relevant for us to keep your personal data for a longer period after your



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employment has ended. E.g. for bonus payments, bookkeeping or if disputes arises between you and the company.

2.5 Your rights

When we store and process your data as part of your employment, you become the “registered”. The registered has some rights in connection to their own personal data.

These rights are:

- The right to get access to the data stored
- The right to rectify incorrect information
- The right to delete information about
- The right to limit the information
- The right to data portability
- The right to object to the processing of personal data
- The right to object to an automated, individual decision, such as profiling.

2.6 Access to personal data

InCommodities as the data controller has the responsibility to protect your personal data. Only the relevant individuals from InCommodities will have access to your data. This will as a rule of thumb, only be HR and your direct manager. Other individuals might need access to your data, e.g. Finance when calculating bonuses or making the annual report. They are all informed and up to date with our internal policies and guidelines, to ensure the safest processing of your personal data.

3. Visitors at our website

3.1 Collection of data

At InCommodities we do not collect any data on you when you visit our website

www.incommodities.com.



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4. Contact details

If you have any questions or if you wish to exercise your rights as the registered, please contact us at hrsupport@in-commodities.com.

Date of change	Responsible	Summary of change
03 Nov 2020	Ida Hedam Pedersen HR Coordinator	Policy created



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