

# Privacy policy regarding processing of personal data in relation to employees

## Globus Wine

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# Privacy policy regarding processing of personal data in relation to employees

## Globus Wine

### 1. Welcome to GDPR in Globus Wine!

Globus Wine A/S ("Globus Wine" or "we") will collect and process personal data about you, as part of your employment with Globus Wine in accordance with this privacy policy.

### 2. Collection of personal data

Globus Wine will collect and process personal data, which is considered necessary for the administration of your employment with Globus Wine.

The following personal data may be registered:

1. Personal information such as social security number, name, address, phone number, e-mail address, etc.
2. Copy of driving license and passport
3. Work information such as employee ID, start date of employment, CV, job location, work e-mail address, work phone number, title, job position, full time / part time, promotions, etc.
4. Financial information such as salary and other compensation, bonus, taxes, bank account number, other employee benefits, etc.
5. Registration of work hours
6. Size of clothes and shoes
7. Photos and video
8. Sickness absence
9. Absence due to maternity leave or other employment leave
10. Training and education
11. Performance reviews
12. Results of personality tests, etc.
13. Copies of criminal records or other information on criminal offences
14. Passwords and usernames
15. Information obtained as part of access control
16. Disciplinary sanctions
17. Family information such as closest relatives
18. Information necessary in order to administer possible health insurances, pension schemes or other personal benefits, etc.

Further, in certain circumstances we may be required to collect and process sensitive personal data, such as:

1. Health information
2. Union membership

Globus Wine will only collect and process personal data about you, which is considered necessary for the administration of your employment with Globus Wine on the basis of your employment contract, as otherwise requested by you or on the basis of your consent. Your personal data may also be processed in order to comply with legal requirements or to establish or defend legal claims.

### 3. Processing of personal data

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Globus Wine may process your personal data for the following purposes:

1. Staff administration, management and administration of compensation (salary, bonuses, benefits, etc.), training and other HR functions related to your employment with Globus Wine
2. Planning and administration of the Globus Wine workforce
3. Appointments and removals
4. Personal development records, performance management and appraisals, effectiveness assessment, etc.
5. Facility management and security
6. Administration of absence and disciplinary sanctions
7. Completion of employee surveys
8. Administration of whistle-blower notifications
9. Provision and support of IT systems, user profiles, investigations, etc.
10. Handling of claims and disputes
11. Compliance with legal, regulatory and other good governance obligations
12. Other legitimate business purposes

This list of reasons / purposes may be ongoing updated in order to comply with other business needs and / or statutory requirements.

## 4. With whom will Globus Wine share your personal data?

In order to pursue the abovementioned purposes your personal data may be made available to recipients providing relevant services under contract to Globus Wine such as processors of salary, expenses and other compensation information, and IT hosting and maintenance providers. Such service providers will only process the personal data in accordance with our instructions.

Certain personal data will be transferred to other Globus Wine's group companies. This data may be name, title and company name.

Certain personal data will also be reported to government authorities where required by law and for tax or other purposes or to pension or insurance providers as well as travel agencies, airline companies, leasing bureaus and financial institutions. Personal data may also be disclosed to external parties as required by employment or other relevant legislation, or by legal process, as well as to parties you authorise Globus Wine to disclose your personal data to.

Globus Wine will not sell your personal data to any third party.

## 5. Transfer of personal data

If your personal data is transferred to data controllers or data processors located in countries outside the EU/EEA, including group entities, not ensuring an adequate level of data protection, such transfer will be safeguarded by the EU Commission's Standard Contractual Clauses. Otherwise, you will be asked to provide your explicit consent to the transfer.

## 6. Video Surveillance

Globus Wine has installed video surveillance in specific targeted areas of its business premises. The surveillance areas are clearly marked with signs. If in doubt, you can contact Globus Wines COO.

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The purposes of video surveillance are prevention of crime, to ensure security of employees and compliance with relevant requirements.

The recordings will only be accessed and reviewed in case of suspicion of criminal actions, violations of internal guidelines or internal/external audits. The recordings may also be accessed to clarify security questions.

The recordings may be disclosed to the police in case of criminal actions or if the disclosure is otherwise required by law. If disclosure is necessary for other purposes than the aforementioned, we will ask you to consent to such disclosure if you are part of the recordings.

The recordings are stored on a server, which can only be accessed by a limited number of employees and are only accessible by entering password.

Recordings from video surveillance which has been conducted for the purposes of preventing crime are deleted or anonymized no later than 30 (thirty) days after the recording has taken place, unless it is necessary for Globus Wine to keep the recordings for the purpose of dealing with a specific dispute, e.g. in relation to solving crime. Recordings from video surveillance which has been conducted for other purposes will be deleted when it no longer serves a purpose to store the information.

## 7. Storage of your personal data

As a general rule, your personal data will be kept for a period of five years following termination of your employment unless we are required to store your personal data for a longer period due to legal obligations, including the Danish Bookkeeping Act. Your personal data may be stored for a longer period if necessary for the purpose of a specific claim or dispute.

Sensitive personal data will be deleted when the purpose for which it was collected and processed no longer exist.

We may process and store your data for a longer period than set out above in an anonymized form, which means that we will no longer be able to track the data back to you.

## 8. Your rights

You have a right of access to the personal data, which we process and store about you, subject to certain statutory exceptions. Furthermore, you have the right to object to the collection and request restriction of the processing of your personal data. In addition, you have the right to require us to rectify or erase your personal data, unless we are obliged to store and process your personal data, e.g. in relation to the Danish Bookkeeping Act.

Under certain circumstances, you may also request that we provide you with an overview of your personal data in a structured, commonly used and machine-readable format and request us to transmit such data to another data controller.

## 9. Contact and complaints

If you want to exercise any of your rights, if you have any questions regarding this privacy policy or the processing of your personal data, you may contact Globus Wines CFO.

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## Globus Wine

If you have any complaints regarding the processing of your personal data, please do not hesitate to contact us. You can also file a complaint with the Danish Data Protection Agency.

This document is available, in a Danish and English version. In case of doubt, the Danish version shall prevail.

### 10. Signature

By providing my signature below, I hereby declare that I have read and understood the content of this privacy policy and agree to the processing of my personal data in accordance with this policy.

Date:

\_\_\_\_\_  
Name:

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# Privacy policy regarding processing of personal data in relation to employees

## Globus Wine

### Appendix 1 - Use of employee photos in marketing material

#### 1. Use of employee photos

In various contexts, Globus Wine may use situation photos typically showing one or more employees in a job situation as well as portraits of you. Globus Wine may also record videos where you may appear. Photos and videos may be used both internally and externally.

You will always be informed before photos of you are taken.

Photos may be used in campaigns and marketing material such as advertisements, flyers, posters, leaflets, etc., including on our websites and as part of our profile on LinkedIn, Facebook, etc. Photos may also be part of articles or in other industrial contexts, as well as in job advertisements.

#### 2. Consent

##### 2.1 Scope of consent

By signing this consent form, you consent to Globus Wine using your portrait photo as well as situation photos and videos depicting you as stated under clause 1 above.

The consent applies during your employment with Globus Wine as well as following termination of your employment.

The consent provided is voluntary and indefinite. You may refuse to give your consent without this having an impact on your employment.

##### 2.2 Withdrawal of consent

You are free to withdraw your consent at any time. If you withdraw your consent, Globus Wine will no longer use the photos or videos of you.

In connection with the termination of your employment, Globus Wine will attempt to replace any current photos and videos depicting you in connection with the next ordinary updating of the website, profiles on social media as well as marketing material.

#### 3. Signature

I hereby consent to Globus Wines use of photos depicting me in the following situations:

1.	Printed information material (e.g. pamphlets and brochures)
2.	Printed campaign material (e.g. flyers and posters)
3.	External online use (e.g. website)
4.	Video for internal use (e.g. documentation)
5.	Video for public disclosure (e.g. information video)

Date:

\_\_\_\_\_

3.6.2 UK - Privacy Policy related to personal data -

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**Globus Wine**

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[Name]