

# **Privacy Policy**

## **CBS Executive Fonden**

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### **1. Why is CBS Executive Fonden’s Privacy Policy important?**

Your privacy is a priority for CBS Executive Fonden. We are committed to protecting the personal data of our customers, online users and other stakeholders (hereinafter “you”), to processing it with the utmost care and ensuring that it, IT security-wise, is protected in accordance with Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“the GDPR”).

This document informs you about:

- The personal data we collect about you and the reasons for that collection
- The conditions for use of your personal data
- Your rights over your personal data and how to exercise them

## 2. Glossary of the main legal terms used in this document

Terms	Definitions	Comments
Personal data	Personal data is all types of information that can be used <b>directly</b> to identify a natural person – for instance customers, employees and others. But also information that <b>indirectly</b> can identify a natural person, for instance through a compilation of the collected personal data with other publicly available information.	Personal data can for example be: a name, a photo, an e-mail address, a telephone number, a civil registration number, an IP address, a voice recording, your browser data on a website, data linked to an online purchase, etc.
Data controller	Typically a company, a public authority or other agency which, alone or in conjunction with others, determines for what purposes and by which means the processing of personal data can be undertaken.	
Data processor	Typically a company, a public authority or other agency which is processing personal data on behalf of the data controller and based on instructions from the data controller.	
Data Protection Officer (DPO)	Among many other things, the DPO's task is to ensure that the data controller or data processor and their employees are advised in, understand and comply with the company's obligations under the Regulation.	For a company like CBS Executive Fonden, it is not a legal requirement to appoint a DPO.
Processing (of personal data)	"Processing" covers any form of personal data handling. E.g. collection, registration, systematisation, storage, search, use, transmission and deletion of personal data.	

Consent	<p>“Consent” is a voluntary acceptance by a person that the information obtained from the person must be processed. The acceptance must be obtained from the person prior to the processing of his/her data, and it must be evident, which data will be processed, and by whom such data will be processed.</p>	<p>A declaration of consent must be easily accessible and understandable and be in a clear and simple language.</p> <p>A consent can be withdrawn at any time. After that, the data controller shall no longer process personal data on the basis of the consent (unless there is another treatment basis, such as the exercise of authority).</p> <p>It should be as easy to withdraw the consent as to give it.</p>
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### 3. Who is responsible for use of your data in the framework of your relationship with CBS Executive Fonden?

The data controller responsible for processing your personal data is CBS Executive Fonden, which is located at PorcelænsHAVEN 22, 2000 Frederiksberg, Denmark (CVR 1672 0593) – telephone +45 3815 6000, e-mail [info@cbs-executive.dk](mailto:info@cbs-executive.dk).

CBS Executive Fonden has appointed a Data Protection Officer, which is Bo Karner. Bo is particularly responsible for ensuring internal application of the GDPR as well as the liaison with the supervisory authorities. Bo Karner’s contact details are as above-mentioned.

### 4. Why do we collect your personal data and on what grounds?

We collect personal data about you for various reasons.

In general terms, CBS Executive Fonden collects and uses your personal data to function effectively and to optimise your experience with us. Generally, this processing is necessary for:

- The management, processing and tracking of your inquiries to CBS Executive Fonden, as some of these activities are necessary to implement contractual or pre-contractual measures taken at your request (for instance as part of enrolment for a course or an event, or in connection with a job application).
- To pursue CBS Executive Fonden’s legitimate interests in sales and marketing.

You should also be aware that we may collect and use your personal data only if this is based on one of the legal reasons set by the Data Protection Regulation.

The table below specifically lists the purposes for use of your personal data by CBS Executive Fonden, based on one or more of the following legitimate reasons:

- Your consent
- Performance of a contract concluded with you
- Compliance with a legal obligation
- Safeguarding your vital interests
- Other legitimate reasons that allow CBS Executive Fonden's collection of personal data

### **Purposes of collecting your personal data**

#### Main purposes:

- Registration for a course, an event or another contract formation
- Administration before, during and after a course or an event
- Pedagogical management and organisation/delivery of courses
- Management of alumni
- Completion of surveys among current/former course participants
- Issuing of newsletters and similar communication (after obtaining consent)

#### Other purposes:

- Management of our website, including:
  - Access to and benefit of the website's functionalities
  - Understanding and investigating user browsing behaviour in order to improve our digital marketing
  - Quality enhancement of content and functionality
  - Website administration, including security and problem identification
  - Preparation of analyses, statistics and reports, especially regarding the website's target groups or users' behaviours on the website
  - Management and processing of requests from the website's users and, more generally, CBS Executive Fonden's contacts, in order to exercise their personal data protection rights
- Laws and regulations
  - Compliance with statutory obligations attributable to CBS Executive Fonden's activities

## 5. What personal data do we collect?

We only collect and process personal data that is relevant and sufficient in relation to the purposes defined above. The purpose is crucial when it comes to determining, what kind of your personal data we find relevant to collect. The same goes for the scope of the personal data that we process. In this regard, CBS Executive Fonden assures that we do not use more data than those we need for a specific purpose. Additionally, it may be decided by law what type of personal data is required to collect, process and store for our business operations – or to comply with other legal obligations.

Your personal data will be collected and processed, in whole or in part, when you visit our website and enter your personal information in registration forms, interest statements or subscription to our newsletter. Data can also be collected via offline communication.

## 6. Who do we share your personal data with?

As part of our activities, we may often share your personal data. When this is the case, we always ensure optimal protection of your personal data.

### 6.1 Sharing your personal data with faculty and fellow course participants

Teachers and lecturers at CBS Executive Fonden's courses and events will typically receive an overview of the specific course/event containing only the most relevant personal data. The purpose of this is to customise the teaching as much as possible to the current students, thereby increasing the participants' dividend.

Likewise, it is common for course participants to share relevant personal information with the other participants on the same course. The purpose of this is particularly related to network creation.

### 6.2 Sharing your personal data with external partners

In some cases, personal data may be shared with a hotel, airline or other similar external operators. Here too, only the absolute relevant personal data will be shared.

If we disclose your personal data to anyone other than those described above, we will obtain your consent and inform you of what your data will be used for. You may object to this form of disclosure at any time.

## 7. How long do we keep your personal data?

CBS Executive Fonden has established precise rules for how long we retain your personal data. This time period varies depending on the different purposes and must take into account any legal obligations to preserve some of your data.

The storage period has been defined by CBS Executive Fonden to allow us to process your requests (e.g. interest statement, enrolment, or application) and deliver on them. At the same time, we will comply with the principle of proportionality according to which personal data cannot be stored longer than necessary to meet the purpose of collection.

### 7.1 Storage of personal data after course participation

After course participation, CBS Executive Fonden keeps your personal data for 30 years in order to be able to document your participation and issue a diploma on request.

### 7.2 Storage of personal data after interest statement

When you state your interest in a course, we keep your personal data for two years after your interest has been stated. In this way we are able to offer you participation on the next coming course the following year, or the next time the course is offered.

### 7.3 Storage of personal data after newsletter unsubscription

If you unsubscribe from CBS Executive Fonden's newsletter, we keep your personal data up to 2 years after your unsubscription. In this way we are able to document that you accepted to receive our newsletter in the period up to your unsubscription.

However, personal data may be stored in addition to the above-mentioned framework if:

- Consent for this is given
- Archiving is a legal obligation

## 8. What are your rights to your personal data and how do you exercise them?

CBS Executive Fonden observes all necessary and appropriate safeguards to protect your personal data and to ensure your rights as registered.

You have a number of rights, which are described in more details below. However, there are a number of exceptions to this, for example if the processing of your personal data is deemed necessary for a legal claim to be established, enforced or defended. If you have any questions concerning your rights or the exercise thereof, please contact CBS Executive Fonden at [info@cbs-executive.dk](mailto:info@cbs-executive.dk).

As registered, you have the following rights:

- The right to understand what personal data CBS Executive Fonden is processing about you
- The right to have incorrect personal data about you corrected
- The right to be deleted (the so-called "right to be forgotten"), if a number of conditions are met
- The right to restrict the processing of your personal data
- The right to data portability if a number of conditions are met
- The right to object to the processing of your personal data
- The right not to be the subject of decisions that are solely based on automatic processing, including profiling, which has legal effect or similarly significantly affects you.

If the processing of your personal data is based on your consent, you may revoke your consent at any time. However, the revocation does not affect the legal processing of your personal data that has been made before withdrawal has taken place.

## 9. Transfer of your personal data to a third country (outside of EU/EEA)

To the extent that your personal data is transferred to third countries, CBS Executive Fonden ensures an adequate level of protection for such a transfer, for instance by concluding the EU Commission's standard contracts with the recipient of the information, or by transferring to recipients, who are subject to special certification mechanisms, e.g. the EU-U.S. Privacy Shield, if the transfer is made to the United States of America.

## 10. Cookie policy

We use cookies to customise our content and our advertisements, to show you features and to analyse our traffic. Also, we share information about your use of our website with our advertising and analysis partners. Our partners can combine this data with other information you have provided to them, or with information they have collected from your use of their services.

## 11. Data security

CBS Executive Fonden has issued an IT security policy, which contains instructions and actions that protect your personal data against being destroyed, lost or modified, against unauthorised disclosure and against access by unauthorised persons.

CBS Executive Fonden will under no circumstances sell your personal data to third parties.

## 12. Your approval

You accept the privacy policy of CBS Executive Fonden when you visit [www.cbs-executive.dk](http://www.cbs-executive.dk) and [www.cbsbestyrelsesuddannelserne.dk](http://www.cbsbestyrelsesuddannelserne.dk).

## 13. Amendments to this Privacy Policy

This privacy policy is updated regularly and when necessary due to changes in the applicable data protection legislation. The privacy policy will always feature the date of the latest version. To the extent that the modifications are considered significant changes, you will be informed, for instance on the websites of CBS Executive Fonden and CBS Bestyrelsesuddannelserne or via e-mail.

## 14. Date for the latest update of our Privacy Policy

14 January 2021.