

Policy for the processing of personal data - description of procedures for: Employee Foundation of the VKR Group, Recommendation Committees and Contacts

More than 100 recommendation committees are established in the VKR Group companies. A recommendation committee consists of 1 to 11 members, all being employees of a VKR Group company, and the committee decides its composition and working practice.

Applicants type in their applications into the Employee Foundation's online application system (<https://vkr.onlinelegat.dk/brugerlogon.aspx?bruger>). The applicants select from a list the recommendation committee they belong to. The contact in the committee has access to the applicants' information by login (username and password).

The contact who has access to the online application system distributes the submitted applications (paper copies or by e-mail) to the committee members. The members approve or reject the applications and the contact type in the result into the online application system. Any distributed applications – in paper or by e-mail – must be destroyed/shredded or deleted.

After an Employee Foundation board meeting, the contact receives an e-mail notice about donation/rejection of an application with an enclosed letter for the applicant. The letter must be printed and given to the applicant. The recommendation committee/contact must hereafter delete the e-mail.

Should the recommendation committee wish to save information about donations, we recommend you to do so in an anonymised document (e.g. Excel document) containing the following information:

Year	Male/ Female	Seniority	Purpose	Recommended amount, DKK	Donated amount, DKK
2016	M	21 years	Traffic accident - physiotherapy	40,000	30,000
2016	F	6 years	Child's education - nurse	18,000	18,000

The recommendation committee members process applications containing sensitive personal data about employees of the VKR Group and their close relatives. This places strict demands on the committee members and contacts regarding confidentiality and deletion of received material.

Confidentiality

Employee Foundation recommendation committee members and contacts are subject to aggravating obligations regarding confidentiality. Information on applicants and/or beneficiaries may be exchanged only between the committee members, the secretariat and the board of the Employee Foundation when relevant.

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Members of the recommendation committee may access applications and other material comprising personal data on applicants or beneficiaries only by an e-mail address of the company (on a secure network connection). The committee members are not allowed to forward e-mails to private e-mail accounts such as Hotmail, Gmail etc. Physical material and USB memory sticks must be stored securely with no access for any other person than the committee members.

USB memory sticks from unknown suppliers may not be used for storage of material relating to the Employee Foundation. Encrypted USB memory sticks from acknowledged suppliers only may be used.

Applications and any confidential material containing personal data may not be accessed in public where unauthorized persons may see it.

Deletion

Recommendation committee members must delete material containing personal data on applicants or beneficiaries 5 years from receipt from their e-mail accounts. Any physical copies must be destroyed in accordance with the same time limits.

By my signature I accept the instructions mentioned above and promise to observe the guidelines.

Place and date:

Name in block letters

Signature