

## ENERGINET

Energinet  
Tonne Kjærvej 65  
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info@energinet.dk  
CVR-nr. 28 98 06 71

Date:  
18. oktober 2023

Forfatter:  
CEE

## PRIVACY POLICY OF ENERGINET

In regards of processing personal data Energinet is defined as the “Data Controller”. We process these data with the outmost care and constantly make sure that we are compliant with the laws regarding dataprotection.

In this privacy policy we describe how we process your personal data and what rights you as a “Data Subject” have under the law.

### Who are we and how do you contact us

Energinet is Data Controller and responsible for the personal data we process regarding you, the Data Subject. You can contact us using the contact informations mentioned below.

Energinet, CVR. nr. 28 98 06 71.  
Tel.: +45 70 10 22 44  
E-mail: [Info@energinet.dk](mailto:Info@energinet.dk)  
Address: Tonne Kjærvej 65, 7000 Fredericia

### Contact regarding data protection

If you have any questions regarding our processing of your personal data you can contact our Data Protection Officer (DPO):

Tel.: +45 70 26 29 77  
E-mail: [kontaktDPO@energinet.dk](mailto:kontaktDPO@energinet.dk)  
Letter: Use the abovementioned address, att. DPO.

### We are collecting these personal data regarding you

Energinet is collecting the following personal data:

- Name, job title, phone number, e-mail, education and in some instances also your address.
- Personal registration number, social security number or the like, information about financial aspects – these information are only used for the purpose of security clearance.
- Your movement (time and place) within Energinets locations using registrations via access card.
- Video surveillance on all facades, on fences surrounding stations, on parking areas, at main entrances, at entrances to control centers, and at all speedgates.

We aim to ensure that all personal data processed by us is correct and updated. We therefore ask you to notify us at any time of any changes in your personal matters which is relevant to us so that we can ensure that these information are up to date.

## Purpose of processing personal data

Energinet is processing your personal data to fulfill the following purposes:

- Administration of any contract relation.
- To secure and control who has access to buildings and areas. This is done via the use of access cards used on speedgates.
- The purpose of video surveillance is to protect property and valuables as well as increase the security of personnel pursuant to the exercise of public authority. In addition, video surveillance and speedgates registrations are carried out for the purpose of complying with laws and regulations to which Energinet is subject in connection with the operation of the company or fulfillment of various obligations in accordance with applicable laws and regulations, including compliance with emergency requirements and similar operational purposes.

## Legal basis for the processing of personal data

Energinet is solely processing your personal data to the extent it is necessary in regards to the relation you have with us or according to the law.

The legal basis for our processing of personal data:

- Access control using access cards is done pursuant to Executive Order no. 819 of 14/08/2019 on emergency preparedness in the electricity sector, section 13, subsection 3 and Executive Order no. 821 of 14/08/2019 on emergency preparedness for the natural gas sector, section 13, subsection 3.
- Registration of personal data required by law is done pursuant to the General Data Protection Regulation section 6, subsection 1, paragraph b, c, and e on processing which is necessary for the performance of a contract in order to comply with a legal obligation incumbent on the data controller and the exercise of official authority.

We do not process any personal data on the basis of automated individual decision-making nor profiling.

## Erasure

We will erase or anonymize any personal data on you when we no longer have a purpose to possess data making you identifiable.

Video surveillance is erased 30 days after recording. In some specific cases the recordings can be stored for a longer period of time and if we do so, you will be notified.

## Disclosure of personal data

Energinet is disclosing personal data in the following cases:

- For the performance of security clearances personal data will be transferred to the Danish Energy Agency and furthermore til Danish Security and Intelligence Service (PET)
- For crime solving purposes pursuant to Danish law and under strict observation of the rules of data protection.
- Your personal data may be subject to any access to documents in accordance with the rules of the Public Administration Act, whereby personal information about you may be disclosed to another party.

- Your information may also be disclosed to Energinet's group companies when there is a legitimate interest in disclosing personal information for internal purposes.
- Transfers to third countries or international organisations:  
In some cases your personal data will be transferred to our business partners in third countries, including the USA. Transfer to third countries always takes place on the basis of the European Commission's adequacy decisions or Standard Contractual Clauses, and your information is processed confidentially and securely.

In each individual case, we will assess whether the disclosure requires your express consent, or whether the disclosure can take place on a different legal basis.

## Your rights

You have a number of rights under the law in relation to our processing of personal data about you. You can make use of your personal data rights by contacting us. You will find our contact information at the top of this Privacy Policy.

Once you have requested access to the personal data we have registered about you, to have it corrected or deleted, or if you have objected to our data processing, we will investigate whether it is possible to accommodate your request. We will respond to your inquiry as soon as possible and no later than one month after we have received your inquiry.

Your rights:

- **Right of access**  
You have the right to access the personal data we process about you.
- **Right to rectification**  
If you believe that the personal data we process about you is inaccurate, you have the right to have it corrected. You must contact us and inform us of the inaccuracies.
- **Right to erasure / "right to be forgotten"**  
We delete personal data when it is no longer necessary to store them. In special cases, you have the right to have specific information about you deleted before the time of our regular deletion occurs. If you believe that your data is no longer necessary for the purpose for which we collected it, you may request that it be deleted.
- **Right to restriction of processing**  
If you do not agree with the information we have recorded or otherwise process, you may ask us to limit the processing of the information until we have been able to determine whether the information is correct. You can also request restriction instead of deletion if you believe our processing of the information is illegal, or if you believe we no longer need the information, or if you believe that your legitimate interests take precedence over Energinet's legitimate interests as data controller.
- **Right to data portability**  
In certain cases, you have the right to receive your personal data and the right to request that the personal data be transferred from one data controller to another.
- **Right to object**  
You have the right to object to our processing of information about you. If your objection is justified, we will make sure to stop processing the information.
- **Right to complain**  
If you are not satisfied with our answer, you can complain to the Danish Data Protection Agency. In general, if you are dissatisfied with the way in which your personal data has been processed, you can complain to the Danish Data Protection Agency, which will then investigate the case and make a decision. You will find the Danish Data Protection Agency's contact information at [www.datatilsynet.dk](http://www.datatilsynet.dk).

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## Further information on Energinet's processing of personal data

Energinet continuously updates this privacy policy when relevant. We encourage you to keep up to date with the current version on the website or by contacting us for the latest update.