



VOS PRIVACY POLICY

1. PURPOSE

Your privacy is important to VOS (the "Company") and we work to ensure that your personal data remains under your control. We ensure lawful, fair and transparent processing of your data. This Privacy Policy (the "Privacy Policy") states the clear guidelines for VOS' way of handling your personal information on "vos.to". We process personal data in accordance with the applicable EU and Member State regulations on data protection, in particular, the General Data Protection Regulation No. 2016/679 (the "GDPR"). The following is an account of how we use personal information that you leave and/or give when you do business with us, as well as when you use different services (the "service").

2. DATA CONTROLLER AND CONTACT INFORMATION

vos.to (website) is run and owned by:

VOS Destination Management ApS, Masnedøgade 20, 1, DK-2100 København Ø Denmark - E-mail: vos@vos.to

3. WHAT TYPES OF PERSONAL DATA DO WE USE?

VOS may collect and process the following kinds of personal information that we obtain either directly from you when you decide to communicate such data to us (i.e., when you fill in forms on the website or send it to us by e-mail) or indirectly (when you provide us the information via third party). We ensure that the personal data processed is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. The collection of personal data takes place in one of the following cases:

- When a company wants to become our customer, they provide information on the employee who shall be listed as a contact person
- When the company/customer gets new employees, they may be registered as contact persons by the employee or by the company
- In relation to our registration of the company as a customer, you may consent to receiving our B2B newsletter
- When you sign up for our B2B newsletter on the B2B website
- When you use our website
- When filling out the contact boxes (name, address, e-mail, phone number, completed comments and other provided information)
- When you send us a job application (name, surname, e-mail, phone number, information that you provide in the cover letter, CV and other attached documents). Please read Applicant Privacy Policy Notice.
- Any other information that you send to us

You will always be informed of collection of personal data on you unless VOS receives the data directly from your employer or yourself. In case your employer gives information about you, it is to make sure the company gets the best benefits in its collaboration with VOS, and you may at any time use any of your rights as mentioned in section 10.

The personal data we collect can be, i.e. your name, your email address, your phone number and similar identification data as well as information about your navigation on our website: type of browser you are using, what search terms you use, your IP address, location and information about your computer.

4. HOW DO WE USE YOUR PERSONAL DATA?

Personal data is collected and processed the following way:

- Registration and send-out of the newsletter, unless you have opted not to receive such information
- Sending marketing or promotional materials and other information that may be of interest to you, including invitations for events
- Follow up your query by e-mail or phone
- Statistic
- Additional marketing initiatives
- Improvement of administration of the website

VOS always handles your personal data based on one of the legal basis provided for in the GDPR (Articles 6 and 7).

The receipt of newsletters is based on the digital consent of the recipient. The newsletters can be unsubscribed at any time by pressing the button "unsubscribe" in the received email.

5. HOW DO WE DISCLOSE YOUR PERSONAL DATA?

As a rule, we do not transmit your personal data to the third parties without your permission. Your personal data, however, will be transmitted to a third party, i.e. our service providers, agents or sub-contractors for us to deliver the service and purposes mentioned below. The agents or sub-contractors in question are obliged to use that personal information in accordance with applicable regulations and terms stated in this Privacy Policy.



These purposes include:

- Fulfilling the contract with you and legal obligations (Articles 6(1)(b) and (c) of the GDPR)
- Fulfilling your and our legitimate interests (Article 6(1)(f) of the GDPR): Where it is in both your and our benefit that we further process your personal data as part of our business administration, maintaining service quality, customer care, business management, risk assessment/management, security, and operation purposes.
- Consent: For marketing purposes and other similar data processes that may require your authorization for their processing (Article 6(1)(a) of the GDPR). We will usually inform you before collecting your data if we intend to use your data for such purposes or if we intend to disclose your personal data to any third party for such purposes.
- Explicit consent (Article 9(2)(a) of the GDPR)

We will process your data for these specified, explicit and legitimate purposes, and will not further process the data in a way that is incompatible with these purposes.

6. DATA AVAILABLE FOR DATA PROCESSORS

Your personal data will be made available to VOS business partners, who deliver services on behalf of VOS, i.e. in relation to sending out B2B newsletters. These partners solely process the personal data on behalf of VOS and according to the instructions of VOS. If we intend to process personal data originally collected for one purpose and in order to attain other objectives or purposes, we will ensure that you are informed of this. We will keep your personal data for as long as it is necessary for us to comply with our legal obligations, to ensure that we provide an adequate service, and to support our business activities (Article 5 and 25(2) GDPR).

7. HOW DO WE SHARE YOUR PERSONAL DATA

Information that VOS collects may be stored and processed in and transferred between any of the countries in which VOS operates (may involve transferring your personal data out of the EEA). Such transfer may take place for the purposes of providing you customer services, executing your reservation with suppliers (e.g., airlines, hotels). For each of these transfers, we make sure that we provide an adequate level of protection to the data transferred.

8. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We delete your personal data when we no longer need to process them to fulfil one or more of the purposes stated above in sections 4 and 5. Duration of the period depends on the type of information and the reason for the storing. We delete contact information as soon as we are made aware that the data is no longer relevant or up to date. If you unsubscribe, we will automatically delete the data we have collected on you. We kindly ask you to contact us if the contact person or any other data is to be changed. VOS may retain and use your personal information to the extent necessary to comply with our legal obligations, protect against legal liability, any legal proceedings, resolve disputes, and enforce our legal agreements and policies, maximum for five years.

VOS will retain the data collected automatically either generated by the use of the service or from the service infrastructure itself (for example, the duration of a page visit) for internal analysis purposes. This data are generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our service, or in order to meet a legal obligation to retain this data for longer periods.

9. HOW DO WE SECURE YOUR PERSONAL DATA?

We have implemented safety precautions to ensure that our internal procedures meet our high standards of safety. We are thus committed to protecting the quality and integrity of your personal data in the best possible way. VOS takes reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal data. VOS will store all the personal information you provide on its secure servers. We process your personal data in a manner that ensures their appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage.

We undertake to ensure that all processing of personal data is lawful, fair and transparent. Data will only be collected for a specific, explicit and legitimate purpose. Collecting and processing of data will not go beyond what is necessary for the purpose of the processing. The processing shall always be adequate, relevant and limited to what is necessary for the purpose for which it is processed.

We have mechanisms and policies in place in order to identify data processing activities that may result in high risk to your rights and freedoms (Article 35 of the GDPR). If any such data processing activity is identified, we will assess it internally and either stop it or ensure that the processing is compliant with the GDPR or that appropriate technical and organizational safeguards are in place in order to proceed with it.



10. YOUR RIGHTS

You are at any time eligible to get access to the information we have on you, however, with certain legal exceptions. Furthermore, you have the right to take exception to the collecting and further processing of your personal data. Additionally, you have the right to get your data corrected, deleted or blocked according to the rules on this. You also have the right to get a copy of the personal data that you have given us.

- You are at any time entitled to by a written request to receive information about our processing activities that concern your personal data, e.g. which information we have registered about you, the processing purpose, the categories of personal data concerned and the recipients to whom the information have been or will be disclosed (Articles 13 and 14 GDPR).
- You are entitled to obtain from us confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data and certain related information (Article 15 GDPR).
- You have the right to have inaccurate personal data about you rectified by us without undue delay, and to complete any incomplete personal data (Article 15 GDPR). If you become aware that there are errors in the information we have registered about you, we urge you to contact us in writing in order for us to rectify the information.
- You have the right to have your personal data deleted by us without undue delay if, for instance, we no longer have a valid processing purpose, you withdraw your consent, we have no other legal basis for processing your personal data or when certain legal conditions apply (Article 17 GDPR).

If we can prove or demonstrate compelling, legitimate reasons for continued processing which precede your interests, rights and freedoms or the processing is necessary for a legal claim to be established, exercised or defended, we are not obliged to delete your personal data.

- You have the right to restrict our processing of your personal data when certain legal conditions are met, e.g. if you contest the accuracy of your personal data (Article 18 GDPR).
- You have the right to object to processing of personal data on grounds relating to your particular situation, at any time to processing of personal data concerning you, when certain legal conditions are met (Article 21 GDPR). If you object to processing, we will no longer process your personal data unless we can demonstrate compelling, legitimate reasons for continued processing which precede your interests, rights and freedoms or the processing is necessary to establish, exercise or defend a legal claim.
- You have the right to receive the personal data provided to us in a structured, commonly used and machine readable format and to transfer these data to another data controller without our hindrance, when certain conditions are met (Article 20 GDPR).
- You are at any time for reasons concerning your particular situation entitled to object to our processing of your personal data if the processing, for example, is based on legitimate interests or profiling
- You have the right not to be subject to automated decision-making, including profiling, based on the processing of your personal data, insofar as this produces legal or similar significant effects on you, when certain conditions are met (Article 22 GDPR).

You can read more about your rights at www.datatilsynet.dk/english/legislation/ where the main two acts on data protection – GDPR and Data Protection Act are available.

If you intend to exercise any of the rights, mentioned above, please send us a written request to vos@vos.to together with documentation that you are the relevant person.

11. WITHDRAWAL OF CONSENT

You can at any time withdraw any consent that you may have given. We will then delete your information unless we can continue the processing on a different basis. If you wish to revoke your consent, you can contact us on vos@vos.to. Newsletters can be unsubscribed at any time by pressing the “unsubscribe” button in the received newsletter.

12. LINKS TO OTHER WEBSITES

This website contains hypertext links to third-party websites and Internet sources. VOS does not control and cannot be held liable for third parties' privacy practices and content. Please read carefully their privacy policies to find out how they collect and process your personal data.

13. COOKIES

When you visit our website, we use cookies. Cookies are small text files placed on your computer by us or our partners. Cookies allow us to identify the computer or device you are using to access our websites - but we cannot identify you personally. This information is sent back to our systems as you move around our website. We use cookies to record, measure, analyse how long you spend on the site, which pages you visit and how you use our website. We use this information to understand what you want from our website and improve your experience.

When you visit certain sections of our website, Google Analytics, a website analytics service provided by Google Inc (“Google”), will place cookies on your computer's browser. The information generated by the cookies about your use of the website is transmitted to Google. This information is then used for the purpose of compiling statistical reports to enable us to measure and analyse the number of visits to the site and its pages,



the average time spent on the site and the pages viewed. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personal data of visitors to our website. We will not associate any data gathered via use of cookies with any personal data from any source as part of our use of Google Analytics. For further information about Google Analytics please visit www.google.com/analytics and for details of Google Analytics' Privacy Policy, please visit www.google.com/intl/en.

You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on which you may access at <https://tools.google.com/dlpage/gaoptout/>.

You can set up your web browser to refuse cookies, choose which cookies you want or do not want, ask to be notified when a cookie is set or change your mind after you have accepted our cookies. Use the help feature in your browser to see how. If you do not accept cookies, some features of our website will not work.

14. UPDATES TO THIS PRIVACY POLICY

VOS at any time is entitled to update this privacy policy by posting a new version on this website. We encourage you to check this page occasionally to ensure you are familiar with any changes. Any changes to this Privacy Policy will become effective upon issuing of the revised Privacy Policy. If we make changes that we believe are significant, we will inform you through the website to the extent possible and seek your consent where applicable. If you cannot accept the amended policy, you should refrain from using the website henceforth.

15. CONTACT

If you want us to update, change or delete personal data that we've registered on you, wish to gain access to the personal data on you that we process, or have any questions relating to this Privacy Policy, the practices of this website or VOS's treatment of your personal data, please contact: vos@vos.to or write us on the following address:

VOS Destination Management ApS, Masnedøgade 20, 1 DK-2100 København Ø Denmark

16. RIGHT TO COMPLAIN

You are at any time entitled to file a complaint to a supervisory authority about our processing of your personal data. The Danish supervisory authority is the Danish Data Protection Agency ("Datatilsynet"), Borgergade 28, 5, 1300 København K.