

**Document P–MI 13.04 – Document P–MIH 02.04 – Document P–MIE 09.04 –  
Document P–MB 16.04**

23 March 2023  
MS/KS/TSH/EUC

## **Joint Group Personal Data Processing Policy**

### **1. In general about the Joint Group Personal Data Processing Policy**

- 1.1 This joint Group policy (the “Policy”) applies to Fondsmæglerselskabet Maj Invest A/S, Maj Invest Holding A/S, Maj Invest Equity A/S and Maj Bank A/S and their employees, together called the “Maj Group”. The Policy will ensure compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 “General Data Protection Regulation”).
- 1.2 This Policy and any personal data processing procedures in Fondsmæglerselskabet Maj Invest A/S, Maj Invest Holding A/S, Maj Invest Equity A/S and Maj Bank A/S concerning the processing of personal data in practice, including the erasure of personal data, etc. and verification of the principles in the policy (the “Procedure”) together constitute the Maj Group's personal data processing regulations.

### **2. Description of the Maj Group's processing of personal data**

#### **2.1 Collection and custody of personal data**

The Maj Group does not collect personally identifiable information without legal grounds for processing, including consent to hold and process this information. Personally identifiable information is information that can be connected to a specific person. The Maj Group's registration of personally identifiable information is typically limited to name, address, telephone number and e-mail address. In certain situations, CPR no. (Danish personal reg. no.) may also be collected. Telephone conversations concerning advisory services and order execution are recorded, to safeguard documentation.

The Maj Group collects personal data when natural persons or legal entities (i) become customers or consider becoming customers of the Maj Group; (ii) have given their consent to our use of the personal data for a specific purpose, such as registration for newsletters or events; or (iii) this is a statutory requirement.

When the Maj Group, as data controller, uses third-party suppliers (data processors) of systems and software, via data processing agreements, controls, reporting and follow-up the Maj Group will ensure that personal data is processed in accordance with current legislation. On the implementation and maintenance of organisational and technical measures, an appropriate security level is maintained with regard to the collection, processing and storage of personal data. Access to personal data is limited and controlled, cf. the IT security policy.

The Maj Group retains personal data for as long as this is relevant, and in accordance with current legislation, including the General Data Protection Regulation.

All personally identifiable information is treated as confidential. The Maj Group does not sell or pass on personal data to other parties without consent or legitimate grounds. Legitimate grounds may be disclosure to the auditors, the FSA (Danish or foreign) and the Danish Data Protection Agency.

In conjunction with customer handling and reporting, IT hosting and support, sending out newsletters, accounting and business activities, and AML/KYC requirements, personal data may be transferred to third countries outside the EU/EEA, including Canada, the USA, Australia, Peru, Vietnam, Singapore and Indonesia. The Maj Group ensures an appropriate level of protection and arranges the required guarantees, agreements and supplementary measures (when relevant), so that the level of protection matches the personal data. Where personal data is transferred to a data processor, the Maj Group will ensure a legal basis for transfer, including the European Commission's standard contractual clauses (see link [here](#)) for the transfer of personal data to data processors in third countries outside the EU/EEA, where this might be relevant.

## 2.2 Rights of data subjects

All data subjects may request access to details of which information the Maj Group processes about the individual in question. When a request for access is processed, a

response must be given within four weeks of receipt. If this deadline cannot be met, for technical or other reasons, written notice of the delay must be given to the requester. Access to this insight may be limited by legislation, consideration of the protection of the privacy of other persons, protected business information, and internal assessments and material that may be exempt from the right of access.

### 2.3 Amendment or erasure of data

If the Maj Group becomes aware of incorrect or irrelevant registration of personal data, the Maj Group will ensure that this data is corrected or erased immediately, subject to the limitations set by legislation.

In addition to the data subject's rights described under clauses 2.2 and 2.3, subject to the terms and exemptions under data protection legislation, the data subject is also entitled to the limitation of the processing of personal data, and to data portability. The data subject is also entitled – for reasons concerning the special situation of the data subject – to *object to the processing of personal data for marketing/profiling*, when this processing is based on legitimate interests.

## 3. Description of processing of personal data, particularly for the Maj Group's websites

### 3.1 Collection and custody of personal data at maj.dk

As joint data controllers, Fondsmæglerselskabet Maj Invest A/S and Maj Bank A/S collect and use personal data from visitors to the maj.dk website. The detailed processing of personal data at maj.dk is described in [Appendix 1](#).

### 3.2 Collection and custody of personal data at majinvest.com.

As joint data controllers, Maj Invest Holding A/S, Fondsmæglerselskabet Maj Invest A/S and Maj Invest Equity A/S collect and use personal data from visitors to the majinvest.com website. The detailed processing of personal data at majinvest.com is described in [Appendix 2](#).

### 3.3 Collection and custody of personal data at majbank.dk.

Maj Bank A/S collects and uses personal data from visitors to the majbank.dk website. The detailed processing of personal data at majbank.dk is described in [Appendix 3](#).

## 4. Description of processing of personal data, particularly for Maj World

### 4.1 Collection and custody of personal data in Maj World

Maj Bank A/S collects and uses personal data from customers when they are given access to and use the Maj World customer platform. The detailed processing of personal data in Maj World is described in [Appendix 4](#).

## **5. Publication and contact details in the Maj Group**

- 5.1 The Maj Group publishes selected relevant elements of the Policy on the respective companies' websites.
- 5.2 On these websites, the Maj Group also publishes the contact details of the company's data protection officer (DPO).

## **6. Infringement and revision**

- 6.1 If the Executive Board of one of the companies in the Maj Group finds an instance of non-compliance with the Policy, the Executive Board must notify this to the Board of Directors of the relevant company. In collaboration with the Board of Directors, the Executive Board will take the measures necessary to ensure that the Policy is complied with once again.
- 6.2 The Policy will be revised annually by the Executive Board of each of the companies subject to the Policy, or as required, including on any significant changes in the underlying assumptions, and will be approved by the company's Board of Directors.
- 6.3 Any questions concerning the Maj Group and the Maj Group's Personal Data Processing Policy may be addressed to Maj Invest.

## **7. Changes to the Policy**

- 7.1 Changes to the Policy will be published on the respective companies' websites.

## **8. Entry into force**

- 8.1 This Policy enters into force on its approval by the Board of Directors.

## Fondsmæglerselskabet Maj Invest A/S

Adopted by the Board of Directors on 22 May 2023

Chairman of the Board of Directors Tommy Pedersen	Board member Maria Helene Hjorth	Board member Nils Bernstein
Board member Jørgen Tang-Jensen	Board member Britta Korre Stenholt	Board member Kirsten Slot
Board member Søren Krag Jacobsen		

## Maj Invest Holding A/S

Adopted by the Board of Directors on 22 May 2023

Chairman of the Board of Directors Tommy Pedersen	Board member Maria Helene Hjorth	Board member Nils Bernstein
Board member Jørgen Tang-Jensen	Board member Britta Korre Stenholt	Board member Kirsten Slot
Board member Søren Krag Jacobsen	Board member Tomas Munksgard Hoff	

## Maj Invest Equity A/S

Adopted by the Board of Directors on 22 May 2023

Chairman of the Board of Directors Tommy Pedersen	Board member  Maria Helene Hjorth	Board member  Nils Bernstein
Board member Jørgen Tang-Jensen	Board member Britta Korre Stenholt	Board member Henrik Parkhøi

## Maj Bank A/S

Adopted by the Board of Directors on 24 April 2023

Chairman of the Board of Directors Cato Baldvinsson	Board member  Marianne Settnes	Board member  Nils Bernstein
Board member Henrik Parkhøi		

## **APPENDIX 1: Processing of personal data collected via maj.dk**

The maj.dk website is delivered by Fondsmæglerselskabet Maj Invest A/S (Maj Invest) and Maj Bank A/S (Maj Bank). We are joint data controllers of the personal data collected and processed via the website concerning (a) website visitors and (b) users wishing to create a profile in our user universe. The parties have entered into an agreement on the mutual distribution of the joint data controller responsibility whereby the parties share equal liability for ensuring compliance with GDPR. You can therefore still contact both Maj Invest and Maj Bank if you have questions or other queries concerning processing of personal data at maj.dk. If you contact other companies in the Maj Group, they will refer you to the right point of contact.

### **1. User registration**

When you register as a user at maj.dk, Maj Invest and Maj Bank will register and use your name, e-mail address and password. We do this so that you can access our universe of articles and content related to finance and investment.

We also register information about your interests, including which articles and news you click on, your answers to our quizzes, and from which media you access the website, etc., so that we can better match content specifically to you and your needs and interests, which includes that you get the articles you prefer to read.

Maj Invest and Maj Bank process your personal data on the basis of a legitimate interest, cf. Article 6(1) (f) of the General Data Protection Regulation, where the legitimate interest for Maj Invest and Maj Bank is to be able to deliver the user universe to you, and to optimise its content for the individual user.

Your personal data will not be disclosed to any third party, unless this is necessary to match content to your needs and interests.

You can delete your profile again at any time. The data is erased when you delete your profile at maj.dk, or when you notify us by e-mail at: [information@majinvest.com](mailto:information@majinvest.com) that you wish your profile to be deleted.

### **2. Registration for newsletter**

When you register for our newsletter at maj.dk, Maj Invest, Maj Bank and Investeringsforeningen Maj Invest (the Investment Fund) will register your name, e-mail address and interest areas.

Maj Invest, Maj Bank and the Investment Fund obtain your legal marketing consent to receive newsletters and invitations within your interest areas via e-mail. We process your personal data on the basis of a legitimate interest, cf. Article 6(1) (f) of the General Data Protection Regulation, where the legitimate interest of Maj Invest, Maj Bank and the Investment Fund is to send you newsletters matched to your requirements.

Maj Invest and Maj Bank disclose the personal data to their business partner, Flowmailer (as data processor) to be used to issue newsletters and/or invitations.

You can unsubscribe from our newsletter at any time by using the link in each newsletter, or notifying us by email. The personal data we process when the newsletter is issued is erased when you unsubscribe from the newsletter, or when you notify us of this by e-mail at: [information@majinvest.com](mailto:information@majinvest.com). You can read more in the consent to the newsletter.

### **3. Cookies**

When you accept cookies at [maj.dk](http://maj.dk), Maj Invest and Maj Bank can collect details of your IP address and information on which sites you visit, which articles you read, and when and for how long you visit the sites and/or read articles.

The purpose of processing personal data collected via cookies concerns marketing (i.e. ensuring that we can deliver content, articles and/or ads that match your preferences), and preparing statistics for visits to our website. Consent to storage of and access to cookies is obtained, cf. Order no. 2011/1148 concerning information and consent requirements on storage of or access to information in end-users' terminal equipment (the "Cookie Order").

Maj Invest and Maj Bank process your data collected via cookies, as described above, based on your consent, cf. Article 6(1) (a) of the General Data Protection Regulation.

Maj Invest and Maj Bank share personal data collected from cookies with business partners, including in conjunction with delivery of this site. You can read more about the individual business partners and the purpose of their processing, and for how long your personal data is retained, here in our cookie policy, [maj.dk/cookiepolitik](http://maj.dk/cookiepolitik).

You can amend or withdraw your consent to the actual location of cookies from the cookie declaration by using the link in our cookie policy.

You can read more about the use of cookies on [maj.dk](http://maj.dk) in our cookie policy, [maj.dk/cookiepolitik](http://maj.dk/cookiepolitik).

## **APPENDIX 2: Processing of personal data collected via majinvest.com**

The majinvest.com website is delivered by Maj Invest Holding A/S (Maj Invest Holding), Fonds-mæglerselskabet Maj Invest A/S (Maj Invest) and Maj Invest Equity A/S (Maj Invest Equity). We are joint data controllers of the personal data that is collected and processed via the website concerning visitors to the website. The parties have entered into an agreement on the mutual distribution of the joint data controller responsibility whereby the parties are equally liable for ensuring compliance with GDPR. You can therefore still contact Maj Invest Holding, Maj Invest and Maj Invest Equity if you have questions or the equivalent concerning the processing of personal data at maj.invest.com. If you contact other companies in the Maj Group, they will refer you to the right point of contact.

### **1. Registration for newsletter**

When you register for our newsletter at majinvest.com, Maj Invest Holding, Maj Invest and Maj Invest Equity will register your name, address, e-mail address, employment and phone number.

Maj Invest Holding, Maj Invest and Maj Invest Equity obtain your legal marketing consent to receive newsletters and invitations via e-mail. We process your personal data on the basis of a legitimate interest, cf. Article 6(1) (f) of the General Data Protection Regulation, where the legitimate interest of the parties is to send you newsletters.

Maj Invest Holding, Maj Invest and Maj Invest Equity disclose the personal data to their business partner, Mailchimp and/or Flowmailer (as data processor), to be used to issue newsletters and/or invitations.

You can unsubscribe from our newsletter at any time by using the link in each newsletter, or notifying us by email. The personal data we process when the newsletter is issued is erased when you unsubscribe from the newsletter, or when you notify us of this by e-mail at: [information@majinvest.com](mailto:information@majinvest.com). You can read more in the consent to the newsletter.

### **2. Cookies**

When you accept cookies at majinvest.com, Maj Invest Holding, Maj Invest and Maj Invest Equity can collect details of your IP address and information about which sites you visit, which articles you read, and when and for how long you visit the sites and/or read articles.

The purpose of processing personal data collected via cookies concerns marketing (i.e. ensuring that we can deliver content, articles and/or ads that match your preferences), and preparing statistics for visits to our website. Consent to storage of and access to cookies is obtained, cf. Order no. 2011/1148 concerning information and consent requirements on storage of or access to information in end-users' terminal equipment (the "Cookie Order").

Maj Invest Holding, Maj Invest and Maj Invest Equity process your data collected via cookies, as described above, based on your consent, cf. Article 6(1) (a) of the General Data Protection Regulation.

Maj Invest Holding, Maj Invest and Maj Invest Equity share the personal data collected from cookies with business partners, including in conjunction with delivery of this site. You can read more about the individual business partners and the purpose of their processing, and for how long your personal data is retained, here in our cookie policy, [majinvest.com/juridisk](https://majinvest.com/juridisk).

You can amend or withdraw your consent to the actual location of cookies from the cookie declaration by using the link in our cookie policy.

You can read more about the use of cookies on [majinvest.com](https://majinvest.com) in our cookie policy, [majinvest.com/juridisk](https://majinvest.com/juridisk).

## APPENDIX 3: Processing of personal data collected via majbank.dk

The majbank.dk website is delivered by Maj Bank A/S (Maj Bank). Maj Bank is the data controller of the personal data collected and processed via the website concerning (a) website visitors and (b) visitors applying to be a customer of Maj Bank via majbank.dk. You can contact Maj Bank if you have questions or other queries concerning processing of personal data at majbank.dk. If you contact other companies in the Maj Group, they will refer you to the right point of contact.

### 1. Applying to be a customer of Maj Bank

When you apply to be a customer of Maj Bank via majbank.dk, Maj Bank will register and use your name, address, phone number, e-mail address and financial details. We do this so that we can contact you to inform you of what Maj Bank can offer you, and to enquire whether you might be interested in becoming a Maj Bank customer.

Maj Bank processes your personal data on the basis of a legitimate interest, cf. Article 6(1) (f) of the General Data Protection Regulation, where the legitimate interest of Maj Bank is to be able to contact you to inform you about Maj Bank and discuss your opportunities to become a customer.

Your personal data will not be passed on to any third party.

Your consent may be withdrawn at any time. You can withdraw your consent by notifying us of this, for example by e-mail: [info@majbank.dk](mailto:info@majbank.dk).

### 2. Cookies

When you accept cookies at majbank.dk, Maj Bank can collect details of your IP address and information about which sites you visit, which articles you read, and when and for how long you visit the sites and/or read articles.

The purpose of processing personal data collected via cookies concerns marketing (i.e. ensuring that we can deliver content, articles and/or ads that match your preferences), and preparing statistics for visits to our website. Consent to storage of and access to cookies is obtained, cf. Order no. 2011/1148 concerning information and consent requirements on storage of or access to information in end-users' terminal equipment (the "Cookie Order").

Maj Bank processes your data collected via cookies, as described above, based on your consent, cf. Article 6(1) (a) of the General Data Protection Regulation.

Maj Bank shares the personal data collected from cookies with business partners, including in conjunction with delivery of this site. You can read more about the individual business partners and the purpose of their processing, and for how long your personal data is retained, here in our cookie policy, majbank.dk.

You can amend or withdraw your consent to the actual location of cookies from the cookie declaration by using the link in our cookie policy.

You can read more about the use of cookies on majbank.dk in our cookie policy, majbank.dk,

### **3. Contact form**

When you complete our contact form at majbank.dk, Maj Bank registers your name, phone number and e-mail address. We do this so that we can contact you when required.

Maj Bank processes your personal data on the basis of a legitimate interest, cf. Article 6(1) (f) of the General Data Protection Regulation, where the legitimate interest of Maj Bank is to be able to contact you to inform you about what Maj Bank can offer and to enquire whether you are interested in becoming a Maj Bank customer.

Your personal data will not be passed on to any third party.

Your consent may be withdrawn at any time. You can withdraw your consent by notifying us of this, for example by e-mail: [info@majbank.dk](mailto:info@majbank.dk).

## **APPENDIX 4: Processing of personal data in Maj World**

The Maj World customer platform is owned by Maj Invest Holding A/S and delivered by Maj Bank A/S (Maj Bank) via a licence. Maj Bank is data controller for the personal data that is collected and processed via the platform. You can contact Maj Bank if you have questions or other queries concerning processing of personal data in Maj World. If you contact other companies in the Maj Group, they will refer you to the right point of contact.

### **1. Collection and processing of personal data in Maj World**

When you have been registered as a customer in Maj Bank, you will have access to Maj Bank's customer platform, Maj World, which gives you information about and an overview of your investments.

Maj Bank registers and uses your name, address, phone number, e-mail address, customer category, date of birth and details of employment, education, service conditions, logfiles, finances and customer service profile, when you are given access to and use Maj World. We do this so that Maj Bank can provide investment advisory services in accordance with the agreement between you and Maj Bank.

Maj Bank processes your personal data on the basis of a legal obligation and/or legitimate interest, cf. Article 6(1) (c) and (f) of the General Data Protection Regulation, where the legitimate interest of Maj Bank is to provide investment advisory services.

Your personal data will not be passed on to any third party unless this is necessary to be able to provide investment advisory services via Maj World, or we are legally obliged to make such disclosure, e.g. to public authorities.

Maj Bank retains your personal data throughout the customer relationship and for a subsequent period of five years, unless special circumstances apply.