

COWI PRIVACY NOTICE FOR EMPLOYEES

March 2021



COWI

DEAR EMPLOYEE

We recognise and respect the right to personal data protection. During your employment, COWI will receive and process personal data about you.

This privacy notice for employees tells you what kind of personal we process, the purposes of the processing, for how long we retain this data and the legal basis we rely on. The information we process about you will vary depending on your location, role and personal circumstances.

When appropriate COWI will provide a 'just in time' notice to cover any additional processing activities not mentioned in this privacy notice.

Our processing of your personal data is in accordance with the GDPR and national legislation concerning the processing of such data, which ensures the highest level of protection.

All articles stated in this privacy notice refers to Regulation (EU) No 2016/679 of the European Parliament and the Council – also known as the GDPR. If you have any question about how we process your personal data, please do not hesitate to contact dataprivacy@cowi.com.

This privacy notice is available on cowi.com/privacy/employeeprivacy.

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1 CONTACT INFORMATION

If you have any questions about the processing of your personal data, please contact dataprivacy@cowi.com or contact your local COWI entity:

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2 PERSONAL DATA

2.1 GENERAL EMPLOYEE DATA

DATA CATEGORY	PURPOSE OF THE PROCESSING	RETENTION PERIOD	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
Master Data	<ul style="list-style-type: none"> › In connection with your employment and the ongoing employment relationship, COWI may process a number of items of data about you in order to meet our obligations to you under the contract of employment. › The purpose of the processing is to ensure correct wage and salary payments, registration of hours in the various projects and to generate various employment statistics. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name, address, phone number, national identification number, citizenship, date of birth, job title, education details, bank account information, pay details, time registration, salary and other relevant ordinary personal data necessary to employment.	<ul style="list-style-type: none"> › Article 6 (1)(b) which relates to processing necessary for the performance of a contract. › Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject.
Employee Management	<ul style="list-style-type: none"> › COWI may process employee terms and conditions according to legal requirements, including employment contracts, amendments during employment, resignations, warnings, dismissals and severance agreements. › The purpose of the processing is to manage the employment with you. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	<ul style="list-style-type: none"> › Article 6. Ordinary personal data incl. name, address, workplace, initials, national identification number, bank information, education details, citizenship, phone number, salary, private email. › Article 9. Sensitive data may include: Trade union membership, data concerning health and criminal convictions and offenses or related security measures. 	<ul style="list-style-type: none"> › Article 6 (1)(b) which relates to processing necessary for the performance of a contract. › Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject. › Article 6 (1)(f) as it is a legitimate interest of COWI to document the history of your employment relationship and may be of significance to COWI's legal position with regard to subsequent employment-law disputes. › Article 9(2)(a) and is therefore based on your explicit consent. › Article (2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.

CVs	<ul style="list-style-type: none"> › COWI may process your CV in connection with proposals and project contracts. › The purpose of the processing is to bid on projects. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name, specialty, nationality, date of birth, education, language skills, key qualifications, employment records, experiences from abroad, selected assignments and publications.	<ul style="list-style-type: none"> › Article 6 (1)(b) which relates to processing necessary for the performance of a contract. › Article 6 (1)(f) as it is a legitimate interest of COWI to bid on projects based on CVs.
Emails	In connection with your employment, COWI may store emails sent and received on mail systems provided by COWI. Mails of business relevance may be read after your employment. The purpose of the processing is to store data of relevance to our business and to maintain customer relations.	Personal data is deleted after 12 months when the employee leaves COWI.	Article 6. Ordinary personal data incl. emails sent and received on mail systems provided by COWI.	Article 6 (1)(f) as it is a legitimate interest of COWI to get acquainted with business-relevant email correspondence.
Loggings	COWI logs information about access and access attempts to systems, use of internet accessed on devices provided by COWI in form of site visited, duration and date sent and received as well as other IT-loggings such as use of sensitive or critical resources e.g. directories and files. The purpose of the processing is to monitor the use of devices and equipment provided by COWI.	Personal data is deleted after 13 months.	Article 6. Ordinary personal data incl. access and attempts, use of internet, device address and traffic information.	Article 6 (1)(f) as it is a legitimate interest of COWI to monitor the use of devices and equipment provided by COWI.
Employee Review	COWI may evaluate and assess its employees to measure talent capacity, to identify critical positions and succession for critical positions, and to analyze staff and to manage business areas when redundancies are considered.	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. initials, name, organisational unit number, manager, contract type (norm time/over time), salary, primary job title, primary level, secondary job title, secondary level, entry date, leaving date (if any), employment status, seniority, bonus pay-out, flex hours deleted, flex held, flex pay-out, annual billability.	Article 6 (1)(f) as it is a legitimate interest of COWI to evaluate its employees on a regular basis.
Registration of Next of Kin	<ul style="list-style-type: none"> › COWI may process information about an employee's next of kin. › The purpose of registering an employee's next of kin is for COWI to be able to contact family and/or relatives in case of immediate illness, accidents or similar. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name, address, phone number.	Article 6 (1)(f) as it is a legitimate interest of COWI to contact the employees' next of kin in relation to immediate illness, accidents or similar.

Personal Development Plan (PDP) and Employee Development (ED)	<ul style="list-style-type: none"> › COWI may process personal data in relation to the development of its employees. › The PDP and ED processes provide tools and concept for development of employees and consist of a template and dialogue between the line manager and the employee, and aim to align expectations, goals and activities for learning and development. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. personal development plan (PDP), Employee Development (ED) interview, minutes from ED interviews and possibly information about previous employment.	Article 6 (1)(f) as it is a legitimate interest of COWI to evaluate its employees on a regular basis.
Personality Test	In connection with your employment, you may have completed a personality test for COWI to evaluate your personality and to decide whether your personality fits a job opening. The personality test is also used for mapping of competences in recruitment, development processes for individuals and teams.	Personal data is deleted after six months.	Article 6. Ordinary personal data incl. name, age, gender, email, nationality, information about personality traits e.g. motivation preferences, behaviour and competences.	Article 6 (1)(f) as it is a legitimate interest of COWI to map competences held by current employees.
COWI Academy	<ul style="list-style-type: none"> › COWI may process personal data in connection with its training portal (COWI Academy). › The purpose of the processing is to train employees and to track training progress. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name, initials, email, department and section number, training title, date of completion, home address and national identification number.	Article 6 (1)(f) as it is a legitimate interest of COWI to train its employees and to track training progress.
Global Engagement Survey	The employee engagement survey is COWI's tool for identifying what we do well, and what we can do better in order to improve our workplace and be a great place to work with a high-performance culture. The engagement survey provides the management with facts on employee relations in order to increase engagement, and secure the working environment and productivity.	Personal data is deleted when survey has been fully conducted and consolidated.	Article 6. Ordinary personal data including full name, email, age, gender, career level, seniority in COWI, survey language, country, office location (city), floor and room number, business line, business unit, department and section.	Article 6 (1)(f) as it is a legitimate interest of COWI to identify areas where the work environment can be improved.
Talent Programme (Accelerator)	<ul style="list-style-type: none"> › COWI may ask employees to perform a personality test in connection with the Talent Programme. The personality test assesses the employee's personal preferences, behaviour and aptitude. › The purpose of the Talent Programme is to develop the employee. 	Personal data is stored for up to 18 months after programme completion.	Article 6. Ordinary personal data incl. name, address, test results, feedback and user report.	Article 6 (1)(f) as it is a legitimate interest of COWI to develop its employees.

Health Information	<ul style="list-style-type: none"> › In the case of sick leave during your employment, it may be necessary for COWI to obtain medical certificates and other information relating to your health. › The processing is necessary in order for COWI to clarify its legal position in relation to national legislation. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 9. Sensitive personal data incl. health information such as medical certifications and other information about your health.	<ul style="list-style-type: none"> › Article 6(1)(c) and is therefore based on a legal obligation to which COWI is subject. › Article 6(1)(f) as it is a legitimate of COWI to clarify our legal position in relation to national legislation. › Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
Data on Children	<ul style="list-style-type: none"> › In connection with your employment, COWI may process data on your children. › The purpose of the processing is to decide whether you are entitled to child-care days and time off in connection with sickness. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data, incl. numbers of days off.	Article 6 (1)(b) which relates to processing necessary for the performance of a contract.
References From Previous Employer	<ul style="list-style-type: none"> › COWI may collect references from one or more of previous employers, if we find this appropriate. › The purpose of the processing is to assess whether you are qualified for the job position. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data, incl. data you have allowed us to collect.	Article 6 (1)(a) and is therefore based on your consent.
Employee Photos (Internal use)	Your admittance card picture may be used internally in Skype, Outlook and on the COWIportal for your colleagues to identify you.	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data limited to access card photo.	Article 6 (1)(f) as it is a legitimate interest of COWI to show your employee photo for internal recognition.
Employee Photos, Videos and Voice Recordings (Marketing Purposes)	<ul style="list-style-type: none"> › COWI may ask permission to use photos/videos/ voice recordings of the employee for marketing purposes. › The purpose of the processing is stated in a separate notice accompanying your consent. 	Personal data is retained as long as it is considered to have commercial value to COWI, after which it will be deleted.	Article 6. Ordinary personal data incl. photos, videos and voice recordings.	<ul style="list-style-type: none"> › Article 6 (1)(a) and is therefore based on your consent. › Article 6 (1)(b) and is therefore based on a contract we have with you.
Appeals, complains, warnings etc.	<ul style="list-style-type: none"> › If we during your employment receive complaints about you, or if you receive verbal or written reprimands or warnings from COWI, we will retain the data in this regard. › The purpose of this processing is to store information relating to the employee's work history. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name, address and other contact details.	Article 6 (1)(f) as it is a legitimate interest of COWI to store information relating to the employees work history and may be of significance to COWI's legal position with regard to any employment-law reactions at a later date.

Exit Survey	<ul style="list-style-type: none"> › If you decide to resign or if you are terminated, COWI may send you an Exit Survey for you to fill out. › The purpose of the processing is to understand why employees leave COWI. The data is used to ensure that COWI is a great place to work and to retain skilled and talented employees. 	Personal data is deleted as soon as the survey has been conducted and consolidated into anonymized reports.	Article 6. Ordinary personal data incl. name, initials, entry date, leaving date, gender, age, career information, office location as well as reason for resignation or termination and additional information.	Article 6 (1)(f) as it is a legitimate interest of COWI to understand why some employees resign.
Purchases made with Access Card or other payment cards	COWI may register purchases made with access cards or another payment cards. COWI processes these purchases to deduct the purchases from the employee's pay slip or to facilitate the payment.	Personal data is deleted in accordance with national accounting rules.	Article 6. Ordinary personal data incl. Access Card ID and payment card information.	Article 6 (1)(b) which relates to processing necessary for the performance of a contract.
Photos, videos and voice recordings taken during social events	The purpose of the processing is to showcase social events held in COWI and to strengthen the social relations within the organisation. The publishing of personal data will only take place internally.	Personal data is deleted when the publication no longer has value to COWI.	Article 6. Ordinary personal data incl. photos, videos and voice recordings.	Article 6 (1)(f) as it is a legitimate interest of COWI to showcase the social relations within the organisation.
Employee election for the boards of COWIfonden, COWI Holding A/S and COWI A/S	In connection with the employee election for the boards of COWIfonden, COWI Holding A/S and COWI A/S COWI will process data about you to facilitate the election and to meet our obligation under the Danish Companies Act including executive order No. 344 of 30 March 2012 and Agreement on voluntary arrangement for company and group representation from 2013.	Personal data is deleted 5 years after the election has taken place and the new employee elected board members have joined the boards.	<ul style="list-style-type: none"> › Article 6. Name, address, workplace, initials, national identification number, phone number, citizenship, date of birth, job title and department. › Article 9. Trade union membership. 	<ul style="list-style-type: none"> › Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject. › Article 9 (2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.

COWI Share Programme	<ul style="list-style-type: none">› Buying shares in COWI Holding A/S ("COWI") means making an investment in COWI's future. All employees who are entitled to purchase shares in COWI are registered with our share service partner, which manages a number of share activities on behalf of COWI.› In connection with our invitation to participate in the COWI Share Programme, we transfer a limited number of personal data which enables our share service partner to identify employees entitled to participate in the programme (name, address, e-mail address and employee number).› If you choose to participate in the programme, additional personal data is transferred to our share service partner, in order to be able to manage your share profile on behalf of COWI, to be able to fulfil a contract with you as a shareholder and for COWI to be able to meet legal obligations such as reporting to tax authorities.	<ul style="list-style-type: none">› COWI processes your personal data as long as you have shares in COWI Holding A/S, and as long as it is necessary for us to fulfil our obligations to you as a shareholder. In addition, the personal data is stored as long as it is necessary for COWI to be able to meet our legal obligations.› The personal data can be stored longer, in order to meet any legal requirements.	Article 6. Ordinary personal data incl. name, address, e-mail address, employee number, workplace, initials, national identification number, bank information and phone number.	<ul style="list-style-type: none">› Article 6 (1)(b) which relates to processing necessary for the performance of a contract.› Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject.› Article 6 (1)(f) as it is a legitimate interest of COWI to offer shares to eligible employees.
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2.2 SAFETY DATA

DATA CATEGORY	PURPOSE OF THE PROCESSING	RETENTION PERIOD	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
Workplace Incidents	COWI may collect information regarding workplace incidents, as this is a legal requirement.	Personal data is deleted in accordance with national workplace incidents rules.	<ul style="list-style-type: none"> › Article 6. Ordinary personal data incl. name and national identification number. › Article 9. Sensitive personal data: Data concerning health and data describing the incident. 	<ul style="list-style-type: none"> › Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject. › Article 9 (2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
Video Surveillance and Speed Gate Records	<ul style="list-style-type: none"> › COWI may collect personal data through its video surveillance and its speed gate records. › The purpose of the video surveillance and speed gate records is to protect COWI offices and to prevent intruders from accessing our offices. › Please also see "Access Card" in this table. 	Personal data is deleted after 30 days, unless a longer period of processing is necessary.	Article 6. Ordinary personal data incl. video footage and check-in and check-out records from speed gates.	Article 6 (1)(f) as it is a legitimate interest of COWI to protect its property, employees and projects etc.
Criminal Convictions and Offenses	<ul style="list-style-type: none"> › As part of your employment with COWI, you may be asked to hand in your criminal record in relation to projects, tenders and the establishment of new COWI units and offices. › COWI may also ask for your criminal record, if this is necessary in connection with the employment and the specific content of your job. › The processing is necessary for certain projects and tenders as participation in these is only granted to verified persons. This also applies to the establishment of entities and offices. 	Personal data is deleted immediately after the criminal record has been verified.	<ul style="list-style-type: none"> › Article 6. Ordinary personal data incl. name, address, place of birth, citizenship, national identification number, email and signature. › Article 9. Sensitive personal data: Criminal convictions and offenses or related security measures. 	<ul style="list-style-type: none"> › Article 6 (1)(a) and is therefore based on your consent. › Article 9 (a) and is therefore based on your consent.
Safety Approvals	<ul style="list-style-type: none"> › COWI may process safety approvals of employees in connection with projects that require a certain security level. › The purpose of the processing is for COWI to be able to participate in projects where safety approvals are required in order to participate. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	<ul style="list-style-type: none"> › Article 6. Ordinary personal data incl. name, address, place of birth, citizenship, occupation of both the employee and their spouse, national identification number, civil status and signature. › Article 9. Sensitive personal data: Criminal convictions and offenses or related security measures. 	<ul style="list-style-type: none"> › Article 6 (1)(a) and is therefore based on your consent. › Article 9 (2)(a) and is therefore based on your consent.

Work Place Assessment	The Work Place Assessment helps COWI identify and monitor strengths and weaknesses in our working environment, both physically and psychologically/socially.	Personal data is deleted as soon as the survey has been conducted and consolidated into anonymized reports.	Article 6. Ordinary personal data incl. name, address, initials, age, gender, career level, seniority, nationality, office location, building name, floor and room number, survey language, manager information, business line, business unit, department, section and survey answers.	Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject.
Access Card	<ul style="list-style-type: none"> › In connection with your employment, COWI has granted you an access card. The card holds personal data about you, and is used to grant you access to COWI offices. › The purpose of the processing is to ensure identification and to uphold security about the employees who have access to COWI. 	Personal data is deleted upon return of access card.	Article 6. Ordinary personal data incl. photo of employee, initials, employee number, name, registration of where access card is used.	Article 6 (1)(f) as it is a legitimate interest of COWI to protect property.

2.3 TRAVEL DATA

DATA CATEGORY	PURPOSE OF THE PROCESSING	RETENTION PERIOD	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
Travel Bookings	<ul style="list-style-type: none"> › In connection with your employment, COWI may collect personal data about you in relation to travel bookings. › The purpose of the processing is to book flights, hotels and the like in connection with work- related projects and usual business activities. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. passport information, ID card, driver's license, email, phone number, travel route, loyalty numbers, travel preferences and purpose of travel.	Article 6 (1)(f) as it is a legitimate interest of COWI to send employees to business partners and projects in other countries.
Travel and Expense Claims (DK, NO and SE only)	<ul style="list-style-type: none"> › Employees may claim payment for travel expenses and medical expenses. › The purpose of the processing is to address the claim. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	<ul style="list-style-type: none"> › Article 6. Ordinary personal data including name, address, explanation of expense type, participant list on internal and external participants and national identification number (DK only). › Article 9. Sensitive personal data limited to data concerning health: eyeglass prescription (NO only). 	<ul style="list-style-type: none"> › Article 6 (1)(b) which relates to processing necessary for the performance of a contract. › Article 9 (2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.

2.4 DATA RELATED TO BONUS AND BENEFITS

DATA CATEGORY	PURPOSE OF THE PROCESSING	RETENTION PERIOD	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
Bonus and Benefits	<ul style="list-style-type: none"> › COWI may process personal data about you in order to determine which employees are eligible for the annual bonus scheme. › The purpose of the processing is to live up to our contractual obligations with you. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name, national identification number, employee number, entering date, leaving date, salary, bonus pay out, location in case of expatriation, managers name and career level.	Article 6 (1)(b) which relates to processing necessary for the performance of a contract.
Newspaper Subscription	<ul style="list-style-type: none"> › COWI offers newspaper subscriptions for some employees through their employment contracts. COWI may process personal data in this connection. › The purpose of the processing is to live up to our contractual obligations with you. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name and address.	Article 6 (1)(b) which relates to processing necessary for the performance of a contract.
Phone Subscription	<ul style="list-style-type: none"> › COWI offers phone subscriptions for some employees through their employment contracts. COWI may process personal data in this connection. › The purpose of the processing is to live up to our contractual obligations with you. 	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data incl. name, national identification number, address and phone number.	Article 6 (1)(b) which relates to processing necessary for the performance of a contract.
Benefits on the COWIportal	COWI offers deals and programmes for its employees through the COWIportal. In relation to this, the employee may be requested to give up personal data in order to sign up for these deals and programmes.	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	Article 6. Ordinary personal data including name, private address, private phone number, payment details.	Article 6 (1)(b) which relates to processing necessary for the performance of a contract.

2.5 DATA RELATED TO MOBILITY

DATA CATEGORY	PURPOSE OF THE PROCESSING	RETENTION PERIOD	CATEGORIES OF PERSONAL DATA	LEGAL BASIS
Mobility	COWI may process personal data in relation to secondments and expatriations. The purpose of the processing is to comply with legal requirements and to fulfil an agreement with the employee.	Personal data is deleted in accordance with the national statute of limitation rules when the employee leaves COWI.	<ul style="list-style-type: none"> › Article 6. Ordinary personal data incl. but not limited to national identification number, tax number, contact details, citizenship, former employments information, work- and residence permits (visa), EU registration proof, travel information, information about accompanying spouses and children. › Article 9. Sensitive personal data: Criminal convictions and offences or related security measures. 	<ul style="list-style-type: none"> › Article 6 (1)(b) which relates to processing necessary for the performance of a contract. › Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject. › Article 9 (2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
Visa Applications	COWI operates in countries that may require a visa to enter the country. Employees may be asked to fill out a visa application when required. COWI may obtain the visa through an external data processor.	The visa application documents are deleted when the visa has been included in the passport.	<ul style="list-style-type: none"> › Article 6. Ordinary personal data incl. name, address and passport details. › Article 9. Sensitive personal data limited to racial or ethnic origin. 	<ul style="list-style-type: none"> › Article 6 (1)(b) which relates to processing necessary for the performance of a contract. › Article 6 (1)(c) and is therefore based on a legal obligation to which COWI is subject. › Article 9 (2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.



3 RECIPIENTS OF PERSONAL DATA

The personal data referred to in section 2 may be disclosed to the following categories of recipients if COWI is required by law or if the disclosure is legitimate:

- › Other companies in the COWI Group
- › Customers, potential customers and business partners
- › Public authorities such as tax authorities, police and municipalities
- › As part of COWI's business operations, the personal data may be disclosed to external suppliers, including independent data controllers and data processors
- › Pension and insurance providers
- › COWIfonden
- › COWI Kampsax Personalefond
- › COWI employee committee (COWIs Medarbejderudvalg (CMU))

Furthermore, COWI may pass on relevant personal data about your employment, if considered necessary for tendering for projects to be undertaken for a third party. The data may also be passed on to a third party in connection with third-party investment in or acquisition and sale of COWI or part thereof.



4 TRANSFER OF PERSONAL DATA

COWI may transfer personal data referred to in section 2 to a third country outside the EU/EEA, including Bahrain, Canada, China, Hong Kong, India, Kenya, Mozambique, Oman, Qatar, Singapore, South Korea, Tanzania, Turkey, UAE, UK and USA. COWI has established the necessary and appropriate guarantees to protect this transfer. A copy of the guarantees can be obtained by contacting dataprivacy@cowi.com.

5 RETENTION PERIOD

COWI stores personal data as long as it is necessary for the purpose or purposes for which the data is collected. The tables provide detailed information about retention periods. Personal data may be stored for a longer time if anonymized.

6 SOURCE OF DATA

The personal data is obtained from the employee directly.

7 YOUR RIGHTS

Under applicable law, you have a number of rights in relation to COWI's processing of your personal data. If you wish to make use of your rights, please contact COWI in accordance with section 1.

THE RIGHT TO ACCESS

You have the right to request access into the personal data that COWI is processing about you, as well as additional information.

THE RIGHT TO RECTIFICATION

You have the right to have inaccurate personal data rectified, or completed if it is incomplete.

THE RIGHT TO ERASURE

In certain circumstances, you have the right to have personal data about you deleted before the time of our general deletion occurs.

THE RIGHT TO RESTRICT PROCESSING

In certain circumstances, you have the right to request the restriction of the processing of your personal data. If you are entitled to restrict the processing, COWI may only process personal data – with the exception of storage – with your consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person or for reasons of important public interest.

THE RIGHT TO OBJECT

In certain circumstances, you have the right to object to COWI's processing of your personal data.

THE RIGHT TO DATA PORTABILITY

In certain circumstances, you have the right to receive your personal data in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance.

THE RIGHT TO WITHDRAW CONSENT

Where the processing is based on consent, you have the right to withdraw your consent at any time. To withdraw your consent, please contact COWI. The withdrawn consent will not affect the lawfulness of the processing before its withdrawal. The withdrawal will not have any consequences in relation to your employment.

If you need further guidance in relation to your rights, please contact dataprivacy@cowi.com or your national supervisory authority.

8 COMPLAINTS

If you wish to complain about the processing of your personal data, please contact dataprivacy@cowi.com.

You may also file a complaint to the national supervisory authority. The national supervisory authority responsible for COWI A/S is Datatilsynet (the Danish Data Protection Agency), Denmark.



9 MYANALYTICS

WHAT IS MYANALYTICS?

COWI's uses Microsoft's Office 365 as our core IT-platform. One of the features in Office 365 is MyAnalytics. With MyAnalytics you can explore your work patterns and learn ways to work smarter. By using MyAnalytics, you can improve your focus, wellbeing, network and collaboration. MyAnalytics is powered by artificial intelligence and helps you set aside focus time before your week fills up with meetings, stays on top of tasks and emails, and follow up with important people. The idea is to help you improve your work patterns by giving you time to focus, disconnect and recharge and to network and collaborate more effectively. MyAnalytics sends you weekly email digests with a link to a longer report.

FOR YOUR EYES ONLY

Only you can view your personal data and insights based on work patterns in emails, meetings, calls and chats. MyAnalytics is not designed to enable employee evaluating, tracking or any other monitoring. COWI has no options to allow anyone but the employee to access the personalized information you receive. MyAnalytics only processes data from your COWI accounts limited to Exchange Online email and calendar data, chat and call signals from Skype for Business and Teams. Microsoft has designed MyAnalytics to support COWI's need to comply with GDPR requirements.

HOW DO I UNSUBSCRIBE?

You can easily unsubscribe from the weekly email digest by clicking the unsubscribe link at the bottom of the email from MyAnalytics.

WHY IS MY PROFILE PICTURE ENCLOSED IN THE MYANALYTICS EMAIL?

Due to case law concerning GDPR, it is allowed for organisations like COWI to use employee profile pictures for internal use. This implies that all employee profile pictures are visible on COWIportal and in other IT solutions for internal recognition. Please be referred to 'Employee Photos (Internal use)' in section 2.1.

It is important to highlight that this does not apply for CVs used in the organisation, which you may consent to [here](#).

If you need any assistance, please do not hesitate
to contact dataprivacy@cowi.com