

Global Policy – Data Privacy

Introduction

At NKT Photonics, we highly value safety, not only physical safety, but also all personal data safety that is handled by NKT Photonics or by third parties on our behalf. We understand the importance of confidentiality and privacy of personal data.

We are committed to following the requirements and obligations according to applicable law, including the EU General Data Protection Regulation. We expect and require that our employees and business partners fully comply with applicable laws and regulations.

Our data privacy policy includes our overall approach to how we process personal data, including collection, use, access, sharing and technical and organisational measurements. We believe that adequate personal data handling drives more efficient NKT Photonics business processes and supports our core values and the trust of our stakeholders.

Compliance with data privacy requirements is highly important and must be an integral part of our business processes. Violation of such requirements could cause serious damages to personal data security and NKT Photonics business operations. Therefore, we have established more detailed processes to ensure that we have secure and adequate procedures in place for processing of personal data within a number of areas as described in this policy.

1.1 Collection

We collect and process personal data in compliance with applicable laws and regulations. We collect personal data that is necessary and relevant for the purpose and we ensure that the collected data is accurate.

We collect personal data by applying the proportionality principle and keep data until it is necessary for performing a purpose or as long as is required by law.

1.1.1 Legal basis

We respect the legal basis for collecting personal data, including consent, contract and/or legitimate interests. Before processing personal data, we evaluate relevant acceptance and ensure that we have legal basis for data processing.

1.2 Processing of personal data and information to the individual we collect data on

We implement relevant measures, procedures and technologies to support the rights of the individual(s) we hold data on, including making sure that adequate information is provided to such individual, including:

1.2.1 Access

We ensure adequate access to personal data both in relation to the individual we hold data on and those who have access to the data.

1.2.2 Correction & Objection

We support that the personal data we store is accurate and up-to-date. We request that the relevant individuals notify us of any changes in their personal data, or if we process inaccurate data. In such case, we will within reasonable time take the necessary steps to update or delete incorrect data. An individual may object to the data processing for a specific reason or due to concerns about inaccurate data processing on our part.

1.2.3 Storage & Deletion

Where applicable and in accordance with laws and regulations, we ensure to delete personal data, if the data we process is no longer necessary for the collected purpose or if the individual wishes to withdraw his/her consent for data processing, if such is required and provided.

1.2.4 Data transfer

Upon request by an individual, we may transfer his/her personal data to other companies or third parties. The transfer of personal data does not mean that the data will be deleted automatically from our system. Personal data may be stored until expiry of the original retention period. However, once we have transferred the personal data, we will not be responsible for other companies' privacy policies.

1.3 Personal data sharing

We only share personal data outside NKT Photonics with affiliated third parties or in a contractual relationship, if requested by law or to carry out a request for data transfer from the individual we hold data on. We ensure that relevant data processing agreements are implemented, before we share personal data.

1.4 Data privacy by design and default & Data security breach

We ensure that appropriate technical and organisational measures are implemented to ensure that personal data is processed and stored securely. This also includes the implementation of an adequate alarm system that supports data breach reporting within 72 hours. NKT Photonics managers must ensure that these standards are adhered to at all times.

NKT Photonics request employees and business partners to take immediate action and notify the business if they become aware of any actual or potential suspicions or allegations of non-compliance with respect to the protection of personal data. Please report any security breach to: InformationSecurity@NKTPhotonics.com.