

Processing of personal data  
GDPR  
Resonans Nordic  
June 2018

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## Purpose

The purpose of this document is to document that Resonans Nordic complies with the requirements for the processing of personal data.

Resonans Nordic processes personal data to a minimal extent and primarily uses standard IT solutions for the processing. In the following, the processing of personal data as well as the technical and organizational security measures established in connection with the processing are documented.

## Data Protection Officer (DPO)

Processing of personal data at Resonans Nordic is performed as a support function for the core activities and constitutes a minimal scope. In relation to the risks associated with the processing, the sensitivity and the amount of personal data that is processed, we assess that Resonans Nordic should not have a dedicated data protection Officer.

## Contact information for personal data controller

Jakob Rasborg: [jakob@resonans-nordic.dk](mailto:jakob@resonans-nordic.dk)

## Lists of processing activities

In general

We store only general personal information for the purpose of carrying out our work based on the agreements we have entered with our customers.

### Categories of data subjects and their personal data

- Employees on Resonans Nordic's website. The employees are listed on our website with name and telephone number and will be deleted immediately after the termination of employment.
- Respondents in connection with the implementation of analyzes and surveys. We are regularly sent respondent information by our customers for use in surveys. Personal data can be name, email, title, and position in the company, etc. The information is stored on our secure server and deleted no later than 2 years after use.
- Persons applying for jobs at Resonans Nordic. Personal data can be name, e-mail, telephone number, address as well as social security number and other information on the diploma. These applications are stored on our secure server and deleted within 6 months of use.

### Categories of recipients

The personal information is not passed on to anyone outside the organization other than the same customer who has provided the information to us.

### Data processors

We use the following data processors:

- Surveyxact (data processor agreement signed)
- DISC (data processor agreement signed)
- Dropbox Business (they have confirmed compliance with GDPR)
- Microsoft Office 365 (they have confirmed compliance with GDPR).

### Deadlines for deletion / storage

We generally delete personal data after 2 years, unless otherwise described above or requested by our customer.

### Technical and organizational security measures

Both our server and mail accounts are constantly backed up.

## Known vulnerabilities and planned improvements

There are currently no specific, known vulnerabilities or planned improvements. However, all employees have been asked to review their emails by August 1, 2018 to delete old personal information that is no longer needed, just as Dropbox must be reviewed for old personal information.

## The following is incorporated in the Personnel Handbook

### Processing of personal data

As a result of the GDPR regulations, we have drawn up a policy regarding Resonans Nordic's processing of personal data, which applies to all employees.

The policy means that it is no longer permitted to send personal information per mail, and that all personal information should instead be on Dropbox. Personal information about, for example, respondents in connection with the implementation of analyzes and surveys may only be shared with a colleague via a link to Dropbox.

Reference is also made to this policy.

## Procedure in Analyzer for personal data processing including Resonans Nordic and Working Virtual

Pursuant to the entry into force of the Personal Data Ordinance on 25 May 2018

The administrator organization (Resonans Nordic) must handle the following tasks:

- o Ensure that work is prepared and updated in writing as described in the business process and internal procedure for creating and deleting users as well as allocating access rights to Analyzer in accordance with the administrator organization's (Resonans Nordic) license agreement.
- o Ensure that user access to the Analyzer is shut down or blocked immediately if the user is no longer entitled to access.
- o Ensure that users who are eligible to use the Analyzer have access, including by performing random checks on the created users and their access rights.

Business Process and Procedure in Analyzer for Resonans Nordic and Working Virtual:

- Restriction of access to personal data: The access to personal data in Analyzer is limited to those employees who have a work-related need. Only persons instructed in the use of Analyzer may access the personal data. There is a continuously updated list of users' access and their types of user access.

The list is as follows:

- o Emil Kragh-Schwartz: Administrator (User Responsible for Analyzer at Resonans Nordic and Working Virtual)
- o Peter Daniel Olsen: Administrator
- o Jakob Rasborg: Administrator

- Access management and administration of user access: Only employees who need it and are management approved will be created as users with access to Analyzer. Upon termination of an employee's employment, the employee's user access is blocked or terminated immediately.

- Instruction of employees: Relevant employees are instructed about the purpose and workflows of the data processing as well as their duty of confidentiality.

Violation of the Personal Data Ordinance: If there is a breach of the use of personal data, the user responsible must be contacted immediately.