

## WEBSITE AND ONLINE SERVICES

WEBSITE/ ONLINE SERVICES	TYPES OF PERSONAL DATA	PURPOSE	LEGAL BASIS	STORAGE PERIOD	DISCLOSURE
Poul Schmith's website	Visitors to the website: - Personal data (non-sensitive)	<p>The purpose of the processing of personal data collected through cookies is to optimise and customise the use of the website, to generate statistics on activities on the website and for targeted marketing purposes.</p> <p>Names and job titles published on the website may appear in statistics and analyses of searches on the website, the purpose of which is to optimise the search function of the website.</p>	<p>The data subject has consented to the placing of cookies for one or more purposes, see point (a) of Article 6(1) of the General Data Protection Regulation ("GDPR").</p> <p>The processing of names etc. published on the website is necessary for Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is to optimise the search function of the website by generating statistics and analysing data on website searches. Necessary cookies are placed for the purpose of ensuring the functionality of the website.</p>	<p>Personal data collected through cookies will be processed for a period of up to three years.</p> <p>Names and job titles appearing on the website may be included in statistics and analyses of searches on the website for as long as the name or job title appears on the website.</p>	<p>Poul Schmith will not disclose your personal data to external parties unless it is necessary and there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses regarding data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

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The Bankruptcy Portal (in Danish "Konkursportalen")	Visitors to the website: - Personal data (non-sensitive) - Confidential personal data	<p>The purpose of the processing of personal data collected through cookies is to optimise and customise the use of the Bankruptcy Portal, to generate statistics on activities on the Bankruptcy Portal and for marketing purposes.</p> <p>Personal (non-sensitive) and confidential personal data are processed for the purpose of creating a profile for processing claims lodged with a bankruptcy estate.</p>	<p>The data subject has consented to the placing of cookies for one or more purposes, see point (a) of Article 6(1) of the General Data Protection Regulation ("GDPR").</p> <p>The processing is necessary for Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is the practice of the legal profession. Necessary cookies are placed for the purpose of ensuring the functionality of the website.</p> <p>Information about national identification number or any other identifier of general application is processed on the basis of paragraph (4) of section 11(2) of the Danish Data Protection Act (<i>data-beskyttelsesloven</i>).</p>	<p>Personal data collected through cookies will be processed for a period of up to three years.</p> <p>Personal data that are processed in connection with the creation and administration of a profile will be deleted not later than two years after the profile is no longer connected to a case on the Bankruptcy Portal.</p>	<p>Poul Schmith will not disclose your personal data to external parties unless it is necessary and there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

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The AB18 Guide	Visitors to the website: - Personal data (non-sensitive)	The purpose of processing personal data collected through cookies is to optimise and customise the use of the AB18 Guide, to generate statistics on activities and for marketing purposes.	The data subject has consented to the placing of cookies for one or more purposes, see point (a) of Article 6(1) of the GDPR.  Necessary cookies are placed for the purpose of Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the placing of necessary cookies is to ensure the functionality of the website.	Personal data collected through cookies will be processed for a period of up to three years.	Poul Schmith will not disclose your personal data to external parties unless it is necessary and there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.

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E-compliance	Visitors to the website: - Personal data (non-sensitive)	The purpose of processing personal data collected through cookies is to optimise and customise the use of e-compliance, to generate statistics on activities and for marketing purposes.	The data subject has consented to the placing of cookies for one or more of these purposes, see point (a) of Article 6(1) of the GDPR.  Necessary cookies are placed for the purpose of Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the placing of necessary cookies is to ensure the functionality of the website.	Personal data collected through cookies will be processed for a period of up to three years.	Poul Schmith will not disclose your personal data to external parties unless it is necessary and there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.

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The Access to Documents Handbook (in Danish: Aktindsigtshåndbogen)	Visitors to the website: - Personal data (non-sensitive)	<p>The purpose of the processing is to manage the subscription as well as invoicing and any related administrative purposes.</p> <p>The purpose of the processing of personal data collected through cookies is to optimise and customise the use of the site, to generate statistics on activities on the Access to Documents Handbook and for marketing purposes.</p>	<p>The processing of data for the purpose of creating a subscription is necessary for Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is to be able to provide the requested access to the Access to Documents Handbook and to ensure the functionality of the website by placing necessary cookies.</p> <p>The processing of data for the purpose of invoicing is necessary for compliance with a legal obligation, see point (c) of Article 6(1) of the GDPR.</p> <p>The data subject has consented to the processing of their personal data for one or more purposes, see point (a) of Article 6(1) of the GDPR. This applies, for example, when signing up for the newsletter and cookies.</p>	<p>Personal data collected through cookies will be processed for a period of up to three years.</p> <p>The personal data will be deleted not later than five days after a user profile is deactivated and/or when the subscription is cancelled.</p> <p>Invoices are deleted five years + current year after the invoice date.</p>	<p>Poul Schmith will not disclose your personal data to external parties unless it is necessary and there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

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The Contract Management Tool (in Danish: Kontraktstyringsværktøjet)	Visitors to the website: - Personal data (non-sensitive)	Personal data may appear in invoices and contracts for products and services stored in the Contract Management Tool.	The processing is necessary for Poul Schmith's or a third party's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is to make the Contract Management Tool available.	Personal data contained in contracts that are stored are deleted when the related user and owner of the contract is deactivated.	Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.

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The Time Limit Calculator (in Danish: Fristberegneren)	Visitors to the website: - Personal data (non-sensitive)	<p>The purpose of the processing of personal data collected through cookies is to optimise and customise the use of the Time Limit Calculator, to generate statistics on activities and for marketing purposes.</p> <p>Personal data in the form of e-mail addresses are processed for the purpose of submitting calculations.</p>	<p>The data subject has consented to the placing of cookies for one or more purposes, see point (a) of Article 6(1) of the GDPR.</p> <p>The processing is necessary for Poul Schmith's or a third party's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is to submit calculations at the request of the data subject and to place necessary cookies for the purpose of ensuring the functionality of the website.</p>	<p>Personal data collected through cookies will be processed for a period of up to three years.</p> <p>Personal data are used solely for the purpose of sending the report and responding to any questions.</p> <p>Personal data processed for the purpose of sending the report and contacting the data subject are automatically deleted 60 days after the test has been initiated. No personal data are stored from the website. The e-mail address used to send the calculation is not stored in the system.</p>	<p>Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

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PS:GO client platform	Visitors to the website: - Personal data (non-sensitive)	<p>The purpose of the processing of personal data collected through cookies is to optimise and customise the use of the PS:GO client platform, to generate statistics on activities and for marketing purposes.</p> <p>The purpose of the processing of the data subject's telephone number, name and e-mail address is to create a profile to allow access to the PS:GO client platform.</p>	<p>The processing is necessary for Poul Schmith's or a third party's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is to create a profile so that the user can use the PS:GO client platform and does not have to re-register as a user for each visit to the PS:GO client platform. Necessary cookies are placed for the purpose of ensuring the functionality of the website.</p>	<p>Personal data collected through cookies will be processed for a period of up to three years.</p> <p>Personal data are deleted after two years of inactivity.</p>	<p>Poul Schmith will not disclose your personal data to external parties unless it is necessary and there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

Tender evaluation	Visitors to the website: - Personal data (non-sensitive)	<p>The purpose of the processing of personal data is to provide access to the evaluation tool <a href="#">Tilbudsevaluering.dk</a>.</p> <p>The purpose of the processing of personal data collected through cookies is to optimise and customise the use of the Tender Evaluation tool, to generate statistics on activities for marketing purposes, and to quickly identify and correct any errors that may occur when using the Tender Evaluation tool.</p> <p>Personal data (non-sensitive) are processed for the purpose of creating a profile.</p>	<p>The data subject has consented to the placing of cookies for one or more of these purposes, see point (a) of Article 6(1) of the GDPR.</p> <p>Necessary cookies are placed for the purpose of Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the placing of necessary cookies is to ensure the functionality of the website.</p>	<p>Personal data collected through cookies will be processed for a period of up to three years.</p> <p>Personal data processed in connection with the creation of a profile will be anonymised or deleted after two years of inactivity. Personal data contained in saved tender evaluations are deleted when the associated user and owner of the tender evaluation are deleted.</p>	<p>Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>
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Prequalification	Visitors to the website: - Personal data (non-sensitive)	<p>The purpose of the processing of personal data is to provide access to the evaluation tool Prækvalifikation.dk.</p> <p>The purpose of the processing of personal data collected through cookies is to optimise and customise the use of the Prequalification tool, to generate statistics on activities on the website and for marketing purposes, and to quickly identify and correct any errors that may occur when using the Prequalification tool.</p> <p>Personal data (non-sensitive) are processed for the purpose of creating a profile.</p>	<p>The data subject has consented to the placing of cookies for one or more of these purposes, see point (a) of Article 6(1) of the GDPR.</p> <p>Necessary cookies are placed for the purpose of Poul Schmith's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the placing of necessary cookies is to ensure the functionality of the website.</p>	<p>Personal data collected through cookies will be processed for a period of up to three years.</p> <p>Personal data processed in connection with the creation of a profile will be anonymised or deleted after two years of inactivity.</p>	<p>Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>
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Docufy	Visitors to the website: - Personal data (non-sensitive)	Personal data are processed for the purpose of managing the creation of a user profile on Docufy and related administrative purposes.	The processing is necessary for Poul Schmith's or a third party's pursuit of a legitimate interest, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is to make Docufy available and to place necessary cookies for the purpose of ensuring the functionality of the website.  The data subject has consented to the processing of personal data for one or more specific purposes, see point (a) of Article 6(1) of the GDPR.	Personal data collected through cookies will be processed for a period of up to three years.  Users are deactivated at the request of the client or when a subscription is cancelled.  Not later than one year after completing the Enterprise Solutions contact form on Docufy.dk, the personal data provided for this purpose will be deleted.  Invoices are deleted five years + current year after the invoice date.	Poul Schmith only discloses your personal data to external parties if necessary and if there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.

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The ComPLAYance app	Users of the app: – Personal data (non-sensitive)	Personal data are processed for the purpose of managing the creation of a user profile on the comPLAYance app and related administrative purposes.	<p>The processing is necessary for the performance of a contract, cf. point (f) of Article 6(1) of the GDPR on processing necessary for the pursuit of a legitimate interest by Poul Schmith or a third party, see point (f) of Article 6(1) of the GDPR. The legitimate interest justifying the processing is to make the comPLAYance app available.</p> <p>The data subject has consented to the processing of personal data for one or more specific purposes, see point (a) of Article 6(1) of the GDPR.</p> <p>In certain cases, Poul Schmith is the data processor on behalf of our client, where we act on instructions from the data controller and in accordance with a data processing agreement. In such cases, this information form and data protection policy do not apply to the processing.</p>	<p>Personal data will be deleted within one year after the last use of the comPLAYance app or according with the applicable data processing agreement.</p> <p>Personal data are stored until the case is filed and in some cases for a subsequent period of 10 years, unless special circumstances render it necessary to retain the file on a short or long term basis, for example if the continued processing is necessary for the establishment, exercise or defence of a legal claim.</p> <p>Invoices are deleted five years + current year after the invoice date.</p>	<p>Poul Schmith will not disclose your personal data to external parties unless it is necessary and there is a legal basis for doing so. External parties may be public authorities, private businesses or persons, foundations, associations, etc., depending on the nature of the case. Poul Schmith discloses data to our data processors (e.g. IT suppliers). The transfer of personal data to a country outside the EU/EEA that has been assessed by the European Commission as not being safe because data protection rules may be more lenient than in Denmark and the rest of the EU/EEA may take place on the basis of a number of different transfer bases according to which a system is established that ensures the necessary data protection. An example of this is the conclusion of the European Commission's standard contractual clauses on data protection with the recipient and additional measures, or that appropriate data protection is in place in such countries according to the European Commission (adequacy decisions). In specific cases, transfers to such countries may also take place in accordance with Article 49(1) of the GDPR, e.g., a transfer for the purpose of establishing, exercising or defending a legal claim.</p>

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ACTION	AUTHOR	APPROVED BY	DATE OF APPROVAL	VERSION
Updating of address details in footer	MLGA	MLGA	17 December 2025	1.9
Revision of form regarding compliance with the duty of information	MLGA	MLGA/SDFR	10 November 2025	1.8
Updating of form regarding compliance with the duty of information.	SDFR/MLGA	SDFR	10 October 2024	1.7
Updating of form regarding compliance with the duty of information.	SDFR	SDFR	19 July 2023	1.6
Updating of information on disclosure.	LBEN	SDFR	22 November 2022	1.5
Updating of form regarding compliance with the duty of information.	SDFR	SDFR	17 August 2022	1.4
Addition of prequalification information and adjustment of deletion deadlines for tender evaluation.	LBEN/SDFR	SDFR	June 2022	1.3
Adjustment of deletion deadlines for Caseview and the Bankruptcy Portal	MSKO	SDFR	June 2021	1.2
Adjustment of legal basis for the processing of data collected through cookies.	MSKO	JNO	Oktober 2020	1.1
Drafting of form regarding compliance with the duty of information	MSKO	JNO	June 2019	1.0

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