

# Privacy notification – SOS Dansk Autohjælp (SOS DAH)

## 1 PROCESSING OF PERSONAL DATA

SOS International/SOS Dansk Autohjælp ("SOS") is one of the biggest suppliers of roadside services in the Nordic countries. We have both direct agreements with car owners and we are sub-supplier to insurance companies, car factories' mobility program's and member organisations. Through our emergency dispatch centers - which are open around the clock – we are ready to assist car owners at home as well as abroad. We are associated with an extensive network of assistance companies in the Nordic countries as well as Europe.

SOS collects and processes personal data about you, when we handle your cases and requests. The purpose of the processing of information about you is to deliver roadside assistance services to you in relation to your roadside agreement. We are acting as the controller when we process your personal data in relation to handling the roadside assistance case. We also process your personal data in relation to marketing and sales of our roadside products.

If you have entered the roadside agreement with your insurance company or another roadside assistance provider and you have questions relating to their processing of personal data, please contact your insurance company or other roadside assistance provider.

## 2 WHAT INFORMATION ABOUT YOU DO WE USE?

SOS processes information about you which we receive from you, or from another person who reports the claim on your behalf, when we perform the assistance. We also collect and disclose information to and from authorities and co-operation partners in our supplier network or with whom we cooperate, i.e. public registers and suppliers such as the motor register, towing stations, garages, transportation companies, it-suppliers and other cooperation partners in our supplier network. We exchange information with your insurance company or your roadside assistance provider to the extent that it is necessary to handle your case. In addition, we can disclose information about you to other authorities if there is a legal basis to it.

The information we collect and process in each assistance case may vary, but it will be regular personal data and national identification number, including mainly:

- (i) Contact information including name, address, telephone number, e-mail address and contact information about relatives and co-passengers
- (ii) Information about your roadside agreement
- (iii) Driving license
- (iv) National identification number
- (v) Bank details

- (vi) Information regarding expenses related to your case
- (vii) Information about your car, including registration number and vehicle details
- (viii) Information about the delivered assistance, including cause of breakdown or damage, place of breakdown or damage, towing and your onward journey
- (ix) Information transmitted from your mobile device when you use SOS's roadside app. This may include information about geographical location, etc.

Please see also section 7 below about phone recordings.

### **3 HOW WILL WE USE THE INFORMATION ABOUT YOU?**

The purpose of processing information about you is to:

- (i) Deliver roadside assistance services to you in relation to your roadside agreement
- (ii) Document agreements between you and SOS
- (iii) Conduct quality assurance, invoicing and accounting
- (iv) Conduct cost control of invoices in your case
- (v) Deliver statistics and other reporting
- (vi) Handle complaints regarding SOS's assistance services
- (vii) Document agreements entered into during our phone calls
- (viii) Market and sell our roadside products
- (ix) Handle authorities' requests for information regarding your case

### **4 LEGAL BASIS**

When SOS receives, and handles your case, we process information about you on the basis of the General Data Protection Regulation art. 6(1)(a), (b), (c), (d) and (f) and art. 87 as well as the Danish Data Protection Act paragraph 11(2), depending on the character of the delivered service. SOS's legitimate interests justifying the treatment pursuant to art. 6 (1)(f) are, in particular, to be able to handle complaints, take care of our financial interests, sales drive and quality assurance.

Regarding the transfer of personal data to countries outside the EU/EEA, where the European Commission has not decided that the country ensures an adequate level of data protection, the transfer is conducted based on standard data protection clauses adopted by the European Commission and/or based on the performance of a contract according to art. 49(1)(b).

### **5 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

If you are or have been present in a country outside the EU/EEA in connection with your assistance case, SOS may exchange information with roadside assistance suppliers and other parties in that country if it is permitted under data protection legislation and given that all relevant conditions are fulfilled. SOS will only exchange such information if that it is necessary for handling your case.

These countries might have different rules regarding data protection than in the EU/EEA.

When transfers are conducted based on the European Commission's standard contractual clauses, the transfers are appropriately safeguarded as described here:

[https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en).

## **6 HOW LONG DO WE PROCES YOUR INFORMATION?**

We process information about you for as long as necessary in order to achieve the purpose for which it was collected. We do not store the personal data in a manner, which enables identification, for a period which is longer than necessary for the purpose for which the personal data is legitimately processed.

## **7 ESPECIALLY REGARDING PHONE RECORDINGS**

SOS records phone conversations with the purpose of documenting agreements and quality assurance, when you have given your consent to it. The recording is based on a legal basis in GDPR art. 6 (1) (a).

SOS' processing of the information in the phone conversation can in addition take place with reference to GDPR art. 6 (1) (b) and/or (f).

SOS' legitimate interests justifying the treatment pursuant to art. 6 (1) (f) are, in particular, to be able to handle complaints and document agreements entered into.

We are data controllers for the recording of phone conversations between you and SOS.

The recording can in some cases be submitted to your insurance company or to other third parties (e.g. public authorities), if SOS is legally entitled or obliged hereto.

The recordings are saved as long as they are necessary for the purpose for which they are collected. As a main rule they are saved in 3 months. However, a recording might be stored for a longer period, if a specific need for this occurs.

You have the right to withdraw your consent. If you choose to do so, this will affect only our ability to process your information going forward. If you wish to withdraw your consent, please contact SOS by means of this link <http://www.sos.eu/en/for-you/self-service/#access-to-personal-data>.

See also below section 8 and 9 regarding your rights connected to the phone recordings.

## 8 HOW DO WE PROTECT INFORMATION ABOUT YOU?

SOS is ISO-certified. SOS values quality and information security and thereby we ensure the protection of your personal data. This is underlined by our certifications, such as ISO-27001 (information security) and ISO-27701 (privacy).

We use technical and organisational security measures to protect your personal data against unlawful loss, alteration, destruction or access by unauthorised persons and to ensure lawful processing. Our security procedures are regularly revised on the basis of developments in technology.

## 9 YOUR RIGHTS

You are not obligated to share your information with SOS. If you choose not to provide us with information that are necessary for us to handle your assistance case, this may affect our ability to provide you with the requested services.

Under data protection legislation, you have the right to get access to, receive information about and object to the processing of information about you. Upon request, you also have the right to have information about you rectified, erased or restricted if the information is wrong, misleading or unlawfully processed. In addition, you have the right to data portability.

If you wish to make use of your rights you can contact SOS via the webpage <https://www.sos.eu/en/for-you/self-service/#access-to-personal-data>.

You can lodge a complaint about our processing of information about you by contacting the Danish Protection Agency. You can find their contact information here: [www.datatilsynet.dk](http://www.datatilsynet.dk)

SOS has a Data Protection Officer, who can be contacted on the following email address: [dataprotectionofficer@sos.eu](mailto:dataprotectionofficer@sos.eu).

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