

Privacy Notice for HR administration in Joe & The Juice

Version: May 2018

In connection with your employment, Joe & The Juice will, as the data controller, collect and process personal data about you as an employee.

In this privacy notice, we describe in details how we process, use and disclosure your personal data during your employment in Joe & The Juice.

1. Categories of personal of data and purposes

We collect and process the following types of personal data

Categories of data subjects and categories of personal data	
Category 1 of data subject: Current and former employees	<div>Special categories of personal data</div> <div><div><input type="checkbox"/>Racial or ethnic origin</div><div><input type="checkbox"/>Political opinions</div><div><input type="checkbox"/>Religious beliefs</div><div><input type="checkbox"/>Philosophical beliefs</div><div><input type="checkbox"/>Trade union membership</div></div> <div><div><input checked="" type="checkbox"/>Health data</div><div><input type="checkbox"/>Sex life or sexual orientation</div><div><input type="checkbox"/>Genetic or biometric data for the purpose of identification</div><div><input checked="" type="checkbox"/>Criminal convictions and offenses</div></div>
	<div><input checked="" type="checkbox"/>Non-sensitive categories of personal data: Name, address, email, phone number, gender, nationality, date of birth, national identification number (CPR), Juicer-ID, photo, payroll and tax information, bank account information, pension, work hours, time registration, moneyball position, absence, training history, badges, internal CV, ongoing performance assessments, personality and cognitive ability tests, development plans, warnings and recordings from CCTV in the bars.</div>

We process the personal data for the following purposes:

- Personnel administration in general, including conclusion of employment contracts
- Payroll administration, including reporting to the tax authorities, pension schemes, holiday accounts, and authorities that develop statistics
- Training courses
- Performance evaluations
- KPI projects, e.g. employee satisfaction measurement
- Management of warnings, complaints and collegial difficulties, if any
- Management of work injuries
- International recruitment, including secondment
- Offering internal communication platforms
- Video surveillance in the bars to prevent crimes
- General system administration, development of IT systems, monitoring activity from email accounts and access hereto in business critical situations
- Management of terminations
- Marketing, e.g. in the bars, on the internet etc.

- To comply with applicable personal data protection regulation and safeguarding Joe & The Juice's other legitimate interests, e.g.
 - Documentation requirements
 - Compliance with basic principles and legal grounds for processing personal data
 - Putting in place, maintaining and testing technical and organisational security measures
 - Investigating and reporting suspected personal data breaches and other irregularities e.g. company credit card spend, if any
 - Handling requests and complaints from data subjects and others, if any
 - Handling inspections and queries by supervisory authorities, if any
 - Handling disputes with data subjects and third parties, if any
 - Statistical analysis in order to develop and improve the conditions for employees in Joe & The Juice
 - Mergers, acquisitions, divestures, sale of the company or parts thereof, including preparing information memorandum, preparing and conducting a due diligence, assessing investments, and other activities in such processes

2. Sources

The personal data are primarily collected from you. In addition to this, we may collect information from colleagues or third parties such as

- Your manager
- Your doctor in case of absence due to sickness
- Our provider of credit cards if you have a company credit card
- Our internal IT systems
- Public authorities such as tax authorities

3. The legal basis for the collection and processing of the personal data

The legal basis for collection and processing of your personal data is the following:

- The processing is necessary for the performance of the employment contract to which you are a party, cf. article 6(1)(b) of the GDPR.
- The processing is necessary for the compliance with a legal obligation to which Joe & The Juice is subject, including those outlined by relevant tax laws, laws concerning workers compensation, laws concerning employment including those laws or regulations that govern employee illness and sickness benefits and employee holiday rights and any other law or regulation that makes it necessary for certain employee information to be collected.
- The processing is necessary for the purpose of legitimate interests pursued by Joe & The Juice, cf. article 6(1)(f) of the GDPR, in particular
 - Internal use of photos of you in order for other employees to contact and identify you
 - Use of badges for the purposes of illustrating positions and finished training courses
 - Participation in certain KPI projects
 - Participation in marketing campaigns
 - Assessment of employees' eligibility of secondment on the basis of the employees' applications

- Offering internal communication platforms
- Use of video surveillance in the bars for the purposes of preventing and solving crimes
- General system administration, development of IT systems and monitoring activity of email accounts
- Investigations and reporting of irregularities
- The processing of data related to criminal offences is necessary to pursue a legitimate interests, e.g. in case of reporting to the police due to a punishable action.
- The processing is necessary to establish, exercise or defence a legal claim, e.g. in business critical situations in which access to an employee's email account is necessary.
- You have consented to the processing, cf. article 6(1)(a) of the GDPR, e.g. participation in certain KPI projects and marketing campaigns.

When we collect personal data directly from you for the purpose of personnel administration, you provide the personal data in order to be able to conclude and perform the employment contract with us. You are obliged to provide the information to us. The consequences of not providing the personal data are that we cannot conclude and perform the employment contract with you.

4. Disclosure of the personal data to other controllers

The personal data will be disclosed to and shared with the following recipients:

- Tax authorities
- Public authorities who are required to assess the information
- Pension funds
- Insurance companies
- Phone companies
- Provider of credit cards
- Travel agencies
- Public authorities in the country of secondment
- The Police
- Other Joe & The Juice entities

The legal bases for the disclosure of your personal data are the following:

- The disclosure is necessary for the performance of the employment contract to which you are a party, cf. art. 6(1)(b) of the GDPR.
- The disclosure is necessary for the compliance with a legal obligation to which Joe & The Juice is subject, including laws governing income and tax, employee illness and sickness benefits and holiday rights, and laws governing workers compensation.
- The disclosure is necessary for the purpose of legitimate interests pursued by Joe & The Juice, cf. article 6(1)(f) of the GDPR, in particular
 - In case of work related travels, certain personal data will be disclosed to our travel agency who assists with booking of tickets, hotels, cars etc.
- You have consented to the disclosure, cf. article 6(1)(a) of the GDPR, e.g. disclosure of your CPR number to Eurocard or publishing of photos of you for marketing purposes

- In case of secondment to a country abroad, Joe & The Juice will assist with residence and work permit and in that connection, certain personal data will be disclosed to relevant public authorities upon request. The legal basis of the disclosure is either that the processing is necessary in order to take steps at the request of you prior to entering into a new contract, cf. article 6(1)(b) of the GDPR or compliance with a legal obligation of the country of secondment.

You have the right to withdraw your consent. If you withdraw the consent, this will not affect the lawfulness of the processing and disclosure prior to the withdrawal. Please contact us using the contact details below if you wish to exercise this right.

5. Transfer of personal data to data processors

We use a number of data processors who provide systems and services to us, including, but not limited to, the following categories:

- IT providers who both offer the systems and tools and stores personal data on our behalf
- Payroll administration provider
- Provider of online communication platforms
- Provider of personality and cognitive ability tests

6. International transfers of personal data to recipients (both controllers and processors) in countries outside the EU/EEA

We transfer the personal data to the following recipients located in countries outside the EU/EEA:

Transfers of personal data to a third country or an international organisation	
	Transfer basis
Category of recipient: Other Joe & The Juice entities in case of secondment Country: Country of secondment outside EU/EEA	<input checked="" type="checkbox"/> Conclusion or performance of a contract between the individual and the data controller
Category of recipient: IT Software Platforms and general system management platforms Country: United States; China, Australia, Singapore, India,	<input checked="" type="checkbox"/> EU-U.S. Privacy Shield (only to the U.S.) <input checked="" type="checkbox"/> EU Standard Contractual Clauses - to processors

Korea, Japan, Canada, Brazil, Hong Kong.	
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7. Retention period

We store the personal data for as long as necessary to fulfil the purposes above. Most of the personal data will be deleted 5 years after the date of termination of the employment contract. In specific cases personal data may be stored for a longer period in case of a dispute. Personal data in video recordings from video surveillance will only be stored for 30 days. If personal data are no longer relevant during the employment, we delete them once their purposes for processing have been achieved.

8. Your rights

Subject to the conditions set out in the applicable data protection legislation, you enjoy the following rights:

- The right to request access to the personal data
- The right to rectification of the personal data
- The right to erasure of the personal data
- The right to restriction of processing
- The right to data portability
- The right to object to the processing of the personal data

You also have the right to lodge a complaint with the competent supervisory authority, such as the Danish Data Protection Agency or the relevant supervisory authority located within the market or country that you are placed. Please consult their website for how to submit a complaint at www.datatilsynet.dk.

9. The right to object to the processing of the personal data

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal which is based article 6(1)(f) of the GDPR, including profiling based on this provision. Joe & The Juice must no longer process the personal data unless Joe & The Juice demonstrates compelling legitimate grounds for the processing, which override your interests, rights and freedoms or if processing is necessary for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to the processing for direct marketing purposes, the personal data can no longer be processed for such purposes.

10. Contact

Please contact us at if you have any questions in regards to the protection of your personal data or if you wish to exercise your legal rights.

Contact details of the controller:

Joe & The Juice A/S
Østergade 26a
DK 1100 Copenhagen K
Denmark
CVR-no.: 26 58 93 55
E-mail address: privacy@joejuice.com