

2020

# **OUR DATA PROCESSING ACTIVITIES**

## Introduction

We are under an obligation to protect the confidentiality, integrity and accessibility of our customers', suppliers', partners' and employees' data, including personal data. Protecting personal data is essential to us, and we are continuously working on ensuring compliance with applicable data protection legislation, including the General Data Protection Regulation (GDPR).

## Data controller

When Implement processes personal data in connection with the provision of consultancy services, we consider ourselves a data processor, as we process personal data on behalf of our customers and in accordance with customer instructions. The customer and Implement enter into a data processing agreement containing instructions, terms and conditions for Implement's processing of personal data.

This data protection policy contains information on Implement's processing of personal data, when we are the data controller. More information on this may be found below.

## Our processing activities

The data controller for Implement's processing activities is the company within the Implement group of companies which determines the purposes and means of the processing of personal data. The company details for all of the Implement group of companies may be found [here](#).

You can read more on the categories of personal data that we process for which purposes and on which legal grounds in the tables below:

Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company which has entered into a contract or an engagement letter with the client.	Management of customer relations, including financial and contract administration.	Clients and customers, including their employees.	Non-sensitive personal data, i.e. name, position, contact details.	Processing of personal data is necessary for the performance of contracts with the customer, cf. GDPR, Article 6(1)(b). Processing is also necessary in order for Implement to pursue its legitimate interests in being able to manage contracts, invoice and evaluate the customer relationship, manage and maintain IT systems, administer and manage our website, systems and applications, statistics and business development, cf. GDPR, Article 6(1)(f).	The data subjects.	Five years after the latest project for the customer has been completed.	Personal data may be disclosed to other Implement group companies in accordance with the terms laid down in Implement's intragroup data processing agreement.  Personal data may also be disclosed to subcontractors who are directly involved in the project for the customer.

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Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
Implement Consulting Group P/S, CBR: 32767788 (Denmark).  Implement Consulting Group AG (Zurich, Switzerland) for marketing activities aimed at data subjects in Switzerland.	Marketing activities, including customer relation management (CRM) system.	Customers and potential customers, including their employees.	Non-sensitive personal data, i.e. name, position, contact details	Processing is necessary in order for Implement to pursue its legitimate interests in being able to manage and strengthen customer relations, developing our business and services (e.g. identifying customer needs and improvements in service delivery) cf. GDPR, Article 6(1)(f).	Customers, including customers' employees and public sources such as cvr.dk, biq.dk, greens.dk, linkedIn.com	As long as data are relevant to Implement from a commercial perspective or until the data subject requests a deletion of the data.	Personal data may be disclosed to other Implement group companies in accordance with the terms laid down in Implement's intra-group data processing agreement.

Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
Implement Consulting Group P/S, CBR: 32767788 (Denmark).	Management of Implement's whistleblower system.	<ul style="list-style-type: none"> <li>Customers</li> <li>Customers' employees,</li> <li>Implement's partners or employees,</li> <li>Business partners</li> </ul> Business partners' employees	Name, contact details, personal data contained in the report regardless of whether it is an internal or external reporting channel.	Processing is necessary in order for Implement to pursue its legitimate interests in being able to investigate and handle irregularities, improper behaviour, criminal offences etc., cf. GDPR, Article 6(1)(f).	Persons reporting incidents through the whistleblower system. Internal and external persons who have information on the reported incident.	Reports beyond the scope of the whistleblower system will be erased as soon as the investigation has been completed. Reports giving rise to action will be erased five years after the matter has been finally resolved.	Implement may disclose personal data to external legal counsel. In case of criminal offences, personal data may be disclosed to the police. Finally, Implement will disclose to public authorities where we are under a legal obligation to do so.

Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company which has entered into a contract with the supplier or business partner.	Management of suppliers and business partners.	Suppliers and business partners, including their employees.	Non-sensitive personal data, i.e. name, position, contact details.	Processing of personal data is necessary for the performance of contracts with the supplier or business partner, cf. GDPR, Article 6(1)(b). Processing is also necessary in order for Implement to pursue its legitimate interests in being able to evaluate the business relationship, cf. GDPR, Article 6(1)(f).	The data subjects.	As long as data are relevant to Implement from a commercial perspective or until the data subject requests deletion of the data.	Implement does not disclose any personal data to third parties, unless we are under a legal obligation to do so.

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Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company which organises the course.	Management of courses at Implement Learning Institute (ILI).	Course participants, course instructors.	Non-sensitive personal data, i.e. name, position, contact details.	Processing of personal data is necessary for the performance of contracts with participants, cf. GDPR, Article 6(1)(b). Processing is also necessary in order for Implement to pursue its legitimate interests in being able to evaluate the course, cf. GDPR, Article 6(1)(f).	The data subjects.	Five years from the date on which the participant signed up for the course.	Implement does not disclose any personal data to third parties unless we are under a legal obligation to do so.

Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company which organises the event.	Administration of events.	Participants in events.	Non-sensitive personal data, i.e. name, position, contact details.	Processing of personal data is necessary for the performance of contracts with participants, cf. GDPR, Article 6(1)(b). Processing is also necessary in order for Implement to pursue its legitimate interests in being able to evaluate the event, cf. GDPR Article 6(1)(f).	The data subjects.	As long as data are relevant to Implement from a commercial perspective or until the data subject requests deletion of the data.	Implement does not disclose any personal data to third parties unless we are under a legal obligation to do so.

Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company to which the data subject has consented to receiving newsletters from.	Administration of newsletters.	Subscribers to newsletters.	Non-sensitive personal data, i.e. name, position, contact details.	Processing of personal data is necessary for the performance of contracts with participants, cf. GDPR Article 6(1)(b). Processing is also necessary in order for Implement to pursue its legitimate interests in being able to send the newsletter to the subscriber, cf. GDPR, Article 6(1)(f).	The data subjects.	Until the data subjects terminates the subscription.	Implement does not disclose any personal data to third parties unless we are under a legal obligation to do so.

Data controller	Purpose	Data subject(s)	Category of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company to whom a candidate has sent his/her application.	Recruitment.	The job applicant.	Non-sensitive personal data, i.e. name, position, contact details, educational and professional background, any other personal data which the applicant provides, references. Personal data about criminal offences, including the applicant's criminal record.	<p>Processing of non-sensitive personal data is necessary in order for Implement to pursue its legitimate interests in being able to recruit applicants to positions at Implement Consulting Group, GDPR, Article 6(1)(f).</p> <p>Personal data is processed where necessary to take steps at the request of the applicants prior to entering into a contract, cf. GDPR, Article 6(1)(b).</p> <p>We process personal data collected from references, provided that the applicant has consented to this, cf. GDPR, Article 6(1)(a).</p> <p>We process personal data on criminal records if it is necessary for the purpose of a legitimate interest in ensuring that the applicant is suited for the position at Implement, cf. GDPR, Article 10, cf. Data Protection Act, Section 8(3).</p>	The data subjects and any references (upon consent from the data subject).	Six months after the date on which the applicant was rejected. If the applicant is employed by Implement, the processing of personal data will continue during the employment period.	Implement does not disclose any personal data to third parties unless we are under a legal obligation to do so.

## FURTHER INFORMATION

If you have any questions or need further information about our processing of your personal data or this data protection policy, do not hesitate to contact us:

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[privacy@implement.dk](mailto:privacy@implement.dk)