

Confidentiality and data protection policy

Updated February 2022

Purpose

The purpose of this policy is to account for TCM Group's general data collection and use in order to create transparency for the company's stakeholders.

This policy has been prepared in accordance with section 99 d of the Danish Financial Statements Act (Årsregnskabsloven).

Collection of data

TCM Group collects data to ensure delivery of products and services within kitchen, bathroom and storage, and to service customers best in case of quality complaints or inquiries regarding information on specific orders.

The data is collected via TCM Group's business partners (stores owned by independent franchisees or dealers). Primarily B2B and B2C customer data is collected in connection with sale and delivery of products and services. The data collected can be both personally identifiable and non-personally identifiable. This can for example be data such as: name, address, telephone number, e-mail address etc.

Data on B2B and B2C customers will primarily be collected by one of TCM Group's independent franchise or dealer owned and operated stores or via one of TCM Group's brands' websites. However, TCM Group can also use an external supplier in connection with data collection and processing. In cases where data collection and processing contain personally identifiable data and the supplier in question is a data processor, or TCM Group share relevant data with a third party e.g. a transport provider, a data processor agreement will have been signed, which ensures that the supplier only processes the personally identifiable data in accordance with applicable law and TCM Group's instructions.

Data is stored exclusively in TCM Group's internal systems, to the extent possible.

Use of data

TCM Group primarily uses the collected data in connection with order processing, ie. order confirmation and delivery, and in any follow-up complaints or inquiries.

Data collected by TCM Group or external suppliers on behalf of TCM Group will not be sold to third parties.

The use of data in the daily work and storage of data is operationalized and systematized via internal procedures and policies across the entire TCM Group.

Security

In connection with implementation of new IT systems and technologies in general, TCM Group's IT department will be involved and responsible for ensuring IT security. In addition, it will always be examined whether the data used and stored contains personally identifiable data, and if this is the case, TCM Group's GDPR responsible will be involved to ensure compliance with the data protection regulation.

Deletion of data

TCM Group grants a product warranty towards the customer, and for that purpose TCM Group will maintain access to non-personally identifiable data such as delivery address for a relevant period.

Customers have a right of access to personal data held about them and a right to ask for such data to be corrected or deleted if it is incorrect, incomplete or irrelevant. Any customer who wishes to exercise their right should contact Customer Service. Customers may thus also invoke their right “to be forgotten”, which implies that the customer’s personal data is deleted, while his/her data is anonymized by deleting the link to the customer’s identity.

Governance

The overall responsibility for decisions, application, and implementation of new technologies as well as the use of non-personally identifiable and personally identifiable data is anchored in TCM Group’s executive management.