

# Privacy Policy

PrimaCare A/S ("PrimaCare", "we", "us" or "our") has a high priority with the confidentiality and security of your personal information. The Privacy Policy provides you with the information that you are entitled to receive in accordance with applicable data protection legislation.

## 1. Data Controller and contact details

PrimaCare is the data controller for your personal data if you use PrimaCares health scheme and network of treatment providers via your employer's agreement with PrimaCare, or if you use the FIDIMI product. PrimaCare is also data controller for the processing of certain personal data in relation to our external healthcare professionals.

Our contact details are:

### Data Controller

PrimaCare A/S  
 Hørkær 12B  
 2730 Herlev  
 Tlf. + 45 78 79 39 40  
 E-mail: [privacy.legal@prima-care.dk](mailto:privacy.legal@prima-care.dk)

### DPO (Data Protection Officer)

Under the general data protection regulation, we are required to have a DPO (Data Protection Officer). You can contact our DPO via email at [databeskyttelsesraadgiver@prima-care.dk](mailto:databeskyttelsesraadgiver@prima-care.dk). We strongly recommend that you do not send sensitive or confidential information via email.

## 2. How we process your personal data

Persons using the network and healthcare schemes of PrimaCare, or the FIDIMI-product		
For what purposes are personal data used?	Types of personal data	What is the legal basis for the processing?
<b>Use of healthcare scheme</b> As part of delivering the healthcare scheme, PrimaCare makes an initial assessment of which healthcare professional you need. We do this to be able to refer you to the correct treatment with an external health	<b>General personal data</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Workplace</li> <li>• Department</li> <li>• Employee group</li> <li>• Age</li> </ul>	<u>GDPR art. 6 (1)(b) (performance of a contract)</u> : To be able to deliver the services regulated in the contract we have entered into with either you or your employer, it is necessary for us to process your personal data.

professional in our treatment provider network.	<ul style="list-style-type: none"> <li>• Username/Unique ID</li> <li>• Date of birth</li> <li>• CPR-number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information.</li> </ul>	<p>Data Protection Act section 11, subsection 2(4) cf. GDPR art. 9 (2)(f).</p> <p>GDPR art. 9 (2)(f) (legal claim): The need to be able to determine your right to receive treatment according to the healthcare scheme, which you are covered by.</p>
<p><b>Journal obligation</b></p> <p>If you receive treatment from our authorised psychologists, they will keep patient records in accordance with the Psychologists Act.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Workplace</li> <li>• Age</li> <li>• Username/Unique ID</li> <li>• Date of birth</li> <li>• CPR-number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>GDPR art. 6(1)(c) – legal obligation cf. Psychologist Act section 14.</p> <p>GDPR art. 9 (2)(b) (legal obligation) cf. Psychologist Act section 14.</p> <p>Data Protection Act section 11, subsection 2(1) cf. Psychologist Act section 14.</p>
<p><b>Legal claims</b></p> <p>In order to be able to determine, defend and enforce legal claims.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Workplace</li> <li>• Department</li> <li>• Employee group</li> <li>• Age</li> <li>• Date of birth</li> <li>• CPR-number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>The processing of your personal data is carried out because of our legitimate interest in being able to determine, defend and enforce legal claims, cf. GDPR Art. 6 (1)(f) (general personal data), GDPR Art. 9 (2)(f) (sensitive personal data) and the Data Protection Act section 11 (2) no. 4 cf. GDPR Art. 9 (2)(f) (CPR numbers).</p>
<p><b>Stress coaching</b></p> <p>PrimaCare delivers health coaching for the prevention of stress. For that purpose the stress coach process and note what you have talked about, to be able to provide the best coaching.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Age</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information.</li> </ul>	<p>PrimaCare's legitimate interest in being able to process your personal data to deliver coaching, cf. GDPR Art. 6 (1)(f) (legitimate interest) and GDPR art. 9(2)(a)(consent).</p>

<p><b>Recording of phone calls</b></p> <p>We record phone calls for the use of training and improving the quality of our services</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Telephone number</li> <li>• The other content of the conversation</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information.</li> </ul>	<p><u>GDPR art. 6 (1)(a) (consent)</u>: We record and use the recorded phone-calls for the mentioned purposes with your consent.</p> <p><u>GDPR art. 9 (2)(a) (consent)</u>: We record and use the recorded phone-calls for the mentioned purposes with your consent.</p>
<p><b>Invoicing, bookkeeping and accounts</b></p> <p>To invoice, post and prepare accounts.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• Invoice</li> <li>• Payment details</li> </ul>	<p>The processing of your personal data takes place in order to carry out payments, in accordance with GDPR Art. 6 (1)(b) and to comply with our legal obligations under the Bookkeeping Act and the Accounting Act, cf. Art. 6 (1)(c).</p>
<p><b>Satisfaction surveys</b></p> <p>PrimaCare sends out satisfaction surveys after receiving your treatment in order to optimize our products, services and PrimaCare's external and own healthcare professionals. It is completely voluntary to answer these satisfaction surveys.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• E-mail</li> <li>• Indication of satisfaction with therapists and the course</li> <li>• Other answers that appear from the satisfaction survey</li> </ul>	<p>The processing of personal data takes place on the basis of PrimaCare's legitimate interest in being able to send and receive responses to satisfaction surveys in order to be able to improve its own products and services as well as PrimaCare's network of external and own healthcare professionals, according to GDPR Art. 6 (1)(f).</p>
<p><b>Business Intelligence (statistics and analyses)</b></p> <p>PrimaCare compiles statistics and analyses via Business Intelligence (BI) in order to improve products and services, quality assurance, development and to make anonymous reporting to customers (your employer).</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Name of employer</li> <li>• Whether the treatment has been held with an external therapist</li> <li>• Costs associated with the treatment</li> <li>• CPR number (confidential personal information)</li> <li>• Type of treatment</li> </ul>	<p><u>GDPR art. 6 (1)(b) (performance of a contract)</u>: To be able to deliver the services regulated in the contract we have entered into with either you or your employer, it is necessary for us to process your personal data.</p> <p>PrimaCare's legitimate interest in being able to process your personal data to conduct statistics and analysis, cf. GDPR Art. 6 (1)(f) (legitimate interest)</p>
<p><b>Sending out service announcements</b></p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• E-mail</li> <li>• Phone number</li> </ul>	<p>PrimaCare's legitimate interest in being able to process e-mail and phone number to send out service messages cf. GDPR Art. 6 (1)(f)</p>

In certain cases, PrimaCare sends out service messages to you.		(legitimate interest) and Art. 6 (1)(c) (legal obligation).
<p><b>Transfer to external healthcare professional</b></p> <p>As part of PrimaCare's healthcare scheme, PrimaCare has entered into collaboration agreements with a number of healthcare clinics and treatment centers. In order for you to receive treatment from external healthcare professionals, it is necessary for PrimaCare to disclose your personal information.</p>	<p>The following personal information will be passed on to the external healthcare professional, where you will receive further specialized treatment:</p> <p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Workplace</li> <li>• CPR number</li> </ul> <p><b>Sensitive personal information</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>PrimaCare obtains specific consent according to GDPR Art. 6 (1)(a) (general personal data), Art. 9 (2)(a) (sensitive personal data) and the Data Protection Act § 11, section 2 (no. 2) (CPR number) to pass on personal information to the external healthcare professional.</p>
<p><b>Testing and development of systems</b></p> <p>PrimaCare can use your personal data for testing and development of our systems, so we ensure that everything works as it should.</p> <p>Our test and development environments are subject to the same security as our production environments.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Workplace</li> <li>• Age</li> <li>• Gender</li> <li>• Date of birth</li> <li>• CPR-number</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>• Health information</li> </ul>	<p>The processing of your personal data takes place in order to fulfill the contract entered into with you, cf. GDPR Art. 6 (1)(b) (general personal data), GDPR Art. 9 (2)(f) (sensitive personal data) and the Data Protection Act section 11(2), no. 4, cf. the Data Protection Act, section 7, subsection 3 (CPR numbers).</p>
<p><b>Creating users on the FIDIMI-platform</b></p> <p>We create your userprofile on our platform, because the creation is a prerequisite for you to take the FIDIMI health test.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address (optional)</li> <li>• E-mail</li> <li>• Phone number (optional)</li> <li>• Employee ID</li> <li>• Department</li> </ul>	<p><u>GDPR art. 6 (1)(b) (performance of a contract)</u>: To be able to deliver the services regulated in the contract we have entered into with either you or your employer, it is necessary for us to process your personal data.</p>
<p><b>Health tests, health score and coaching on the FIDIMI-platform</b></p> <p>To be able to access the FIDIMI-platform, you must complete the FIDIMI health test. Based on the results in the health test you will be assigned with a Life-Score as well as a Fit-, Diet, and</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• E-mail</li> <li>• Phone number</li> <li>• Start date</li> <li>• Employee ID</li> <li>• Correspondence</li> <li>• Activities</li> </ul>	<p><u>GDPR art. 6 (1)(b) (performance of a contract)</u>: To be able to deliver the services regulated in the contract we have entered into with either you or your employer, it is necessary for us to process your personal data.</p>

<p>Mindscore. Depending on your subscription-type, you may be allocated to a personal coach.</p>	<ul style="list-style-type: none"> <li>Account activity</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>Health information</li> </ul>	<p>Art. 9 (2)(a) (consent) for the processing of your health information.</p>
<p><b>Step Challenge or focused business process</b></p> <p>PrimaCare can facilitate various company competitions or courses, where PrimaCare will register your personal information as part of the course.</p> <p>PrimaCare can continuously send service announcements containing status in the competition or send relevant material which is a natural part of the process to you by e-mail.</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>Name</li> <li>E-mail</li> <li>Number of steps (if step competition)</li> </ul>	<p>PrimaCare's legitimate interest in being able to process names and e-mail addresses to be able to facilitate competitions and send out service announcements in the course of business, cf. GDPR Art. 6 (1)(f) (legitimate interest).</p>
<p><b>Analysis and health reports</b></p> <p>PrimaCare conducts statistics and analysis in order to improve and develop products and services, as well as to make anonymous reporting to our customers (your employer).</p>	<p><b>General personal data</b></p> <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>E-mail address</li> <li>Phone number</li> <li>Start date</li> <li>Employee ID</li> <li>Subscription type</li> </ul> <p><b>Sensitive personal data</b></p> <ul style="list-style-type: none"> <li>Health information</li> </ul>	<p>PrimaCare's legitimate interest in being able to process ordinary personal data in order to be able to analyse the use of PrimaCare's services and provide an anonymised report to your employer, cf. GDPR Art. 6 (1)(f) (legitimate interest)</p> <p>Art. 9 (2)(a) (consent) for the processing of your health information.</p>
<p><b>APVs</b></p> <p>PrimaCare prepares APVs (workplace assessments) for companies.</p> <p>In this connection, PrimaCare does not receive personally identifiable data and therefore only receives anonymous data.</p>	<p>The data protection rules do not apply to anonymous data.</p>	<p>The data protection rules do not apply to anonymous data.</p>
<p><b>Anonymization</b></p> <p>PrimaCare may anonymize your personal information for the purpose of marketing, developing products and services, machine learning, compiling statistics and for the purpose of sharing and reporting to your employer, sales and publication of completely anonymous data. Your data will be anonymised in accordance</p>	<p>The data protection rules do not apply to anonymous data.</p>	<p>The data protection rules do not apply to anonymous data.</p>

with our internal anonymisation rules.		
The above-mentioned personal data is collected from your employer, directly from you, in certain cases from Forsikringsselskabet Dansk Sundhedssikring A/S and/or from the external health professional.		

Contact persons at external treatment providers in PrimaCares network		
For what purposes is the personal data used?	What types of personal data?	What is the legal basis for the treatment?
<b>Adhere to cooperation agreement</b> PrimaCare processes your personal information in order to register your health clinic or treatment site in our network database of approved therapists and subsequently in order to comply with the collaboration agreement.	General personal data <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• Type of treatment offered</li> <li>• Contract information</li> </ul>	The processing of your personal data takes place in order to comply with the contract (cooperation agreement), GDPR Art. 6 (1)(b).
<b>Invoicing, bookkeeping and accounts</b> To invoice, post and prepare accounts.	<b>General personal data</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• Invoice</li> <li>• Payment details</li> </ul>	The processing of your personal data takes place in order to carry out payments, in accordance with GDPR Art. 6 (1)(b) and to comply with our legal obligations under the Accounting Act and the Accounting Act, cf. GDPR Art. 6 (1)(c).
<b>Satisfaction surveys</b> PrimaCare sends out satisfaction surveys after receiving a treatment, e.g. in order to get feedback on your treatment.	<b>General personal information</b> <ul style="list-style-type: none"> <li>• Information about customer satisfaction with your treatment</li> </ul>	The processing of personal data takes place on the basis of PrimaCare's legitimate interest in being able to send and receive responses to satisfaction surveys in order to be able to improve its own products and services as well as PrimaCare's network of external and own healthcare professionals, cf. GDPR Art. 6 (1)(f).
<b>Legal requirements</b> In order to comply with our legal obligations and to be able to determine, defend and enforce legal claims.	<b>General personal data</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• Type of treatment offered</li> <li>• Contract information</li> <li>• Correspondence</li> </ul>	The processing of your personal data is carried out for the purpose of complying with our legal obligations in accordance with GDPR Art. 6 (1)(c).  In addition, the processing of your personal data is carried out as a result of our legitimate interest in being able to determine, defend and enforce legal claims according to GDPR Art. 6 (1)(f).

The above-mentioned personal information is collected directly from you or from the patients		

## 2.2 Regarding your possibility of influencing our legal basis

### Withdrawal of consent

For those processing activities, which are based on consent as legal basis, you always have the option of withdrawing your consent.

If you wish to withdraw your consent, you must contact us at [privacy.legal@prima-care.dk](mailto:privacy.legal@prima-care.dk). If you withdraw your consent, we will no longer be able to conduct the data processing which are covered by the consent. The withdrawal of the consent will not affect the legality of our processing from the time consent was given up until the consent was withdrawn.

### Objection to legitimate interests

If you want to object to one or more processing activities we base on a legitimate interest as described above, you can contact us by e-mail on [privacy.legal@prima-care.dk](mailto:privacy.legal@prima-care.dk).

, where you can put forward your objection against the specific processing. We will then consider whether your objection is justified, and whether the processing ought to be stopped on that basis.

## 3. Recipients of personal data

### Data processors

In order to fulfill the above-mentioned purposes, PrimaCare may provide third parties with access to your personal data for them to be able to provide relevant services. The services are on a contractual relationship with PrimaCare. Such service providers will only process personal data in accordance with our instructions in accordance with entered data processor agreements. PrimaCare currently uses the following data processors or categories of data processors:

- a. Provider of technical solution for the preparation of satisfaction surveys.
- b. Provider of call center solutions.
- c. Forsikringsselskabet Dansk Sundhedssikring A/S ("DSS"), which is our group company. DSS delivers our booking system and portal for record keeping, assists with the preparation of analyses and statistics (BI), IT support, legal advice, invoicing and recruiting.

### Data Controllers

In some cases, it will also be necessary to pass on your personal information to independent data controllers. These are the following categories of recipients on the basis of the following legal basis:

- a. Law firms, courts and public authorities in the light of our legitimate interest in establishing, defending and enforcing legal claims (Article 6 (1) (f) of the Data Protection Regulation (general personal data), Article 9 (2) (f) of the Data Protection Regulation) (health information) and section 11, subsection 2,

- no. 2, no. 4 of the Data Protection Act, cf. Article 9 (2) (f) of the Data Protection Regulation (CPR numbers).
- b. External health clinics and treatment centers approved as part of PrimaCare's specialized network (consent pursuant to Article 6 (1) (a) of the Data Protection Regulation (general personal data), Article 9 (2) (a) (sensitive personal data) and the Data Protection Act § 11, subsection 2, no. 2 (CPR number) We refer to the form above.
  - c. Forsikringsselskabet Dansk Sundhedssikring A/S with your consent, in two different situations:
    - i. If your Lifescore in the health test is sufficiently low and you also have health insurance with Forsikringsselskabet Dansk Sundhedssikring, we can with your separate consent give a Healthcare Manager from Forsikringsselskabet Dansk Sundhedssikring access to your profile and guide in activating your health insurance.
    - ii. With your separate consent, we may pass on your personal information so that it can compare PrimaCare's data with their own.

As a main rule, your personal data is not transferred to data processors or data controllers located in insecure countries outside the EU/EEA. PrimaCare use MailChimp/Mandrill to automatically send e-mail and even though the service is delivered within EU/EEA, we cannot rule out that data may be transferred to USA.

The relevance of the above listing of data processors and data controllers will depend on your relationship with PrimaCare as specified in the table above.

## **4. How long do we retain your personal data?**

We store your personal data as long as we have a legitimate purpose with the storage, then the personal data is either deleted or anonymised.

Danish law regulates how long personal data can be retained.

Personal data in cases in the health scheme are stored for 10 years after the case is closed.

Documentation for treatments conducted by our psychologists are stored for 5 years after the last activity in the journal.

Personal data, which are subject of complaints-, supervision- or compensation cases, will be deleted after the final conclusion on the case, if the case extends beyond the retention period of the personal data.

Telephone recordings are retained for 6 months.

Other personal data not directly relevant to your claim will, in principle, be retained for 5 years + current financial year.

The personal data we use for test and development of our systems are deleted in our test-environment immediately after the completion of the test.

## **5. Safety**

We protect the confidentiality, integrity and availability of your personal data. Therefore, we have implemented security measures to ensure that our internal procedures comply with the established security standards and applicable legal requirements. Sensitive and confidential personal data must be submitted via our case handling portals, to which the personal data are stored and transmitted encrypted in accordance with the Danish Data Protection Agency's guidelines.

In addition, PrimaCare has developed and implemented internal information security rules, which contain instructions and measures that protect your personal information from being destroyed, lost, altered, unauthorized disclosure, and from unauthorized access or knowledge. Our healthcare professionals are subject to statutory confidentiality.

## 6. Your rights

When PrimaCare processes personal information about you as mentioned above, you have a number of rights under data protection legislation:

- a. **Right of access.** You have the right to gain access and receive a copy of the personal data that PrimaCare process about you, with certain statutory exceptions. You can request access into your journal information via the portal. In that case, PrimaCare will hand over your journal with a code (end-to-end encryption).
- b. **Right to rectification.** You have the right to correct or update outdated or incorrect details we have registered on you.
- c. You have the right to have the processing of your personal data deleted or restricted, unless PrimaCare is entitled or legally obliged to continue the processing, including as a result of the Accounting Act, the record keeping rules or ongoing litigation.
- d. **Data portability.** In certain cases, you have the right to receive the personal information that PrimaCare has registered about you in a structured, commonly used and machine-readable format and to ask PrimaCare to transmit this personal information to another data controller (data portability).
- e. You have the right to revoke any consent given, without prejudice to the lawfulness of the consent-based processing, before revoking it. If you want to revoke a consent, you must contact [privacy.legal@prima-care.dk](mailto:privacy.legal@prima-care.dk).
- f. You always have the right to object to the collection and further processing of your personal data, including the right to object to our processing on the basis of the balance of interests rule under Article 6 (1) of the Data Protection Regulation. 1, letter f.

## 7. Questions and complaints

If you have any questions or wish to make a complaint about our processing of your personal data, please contact our Data Protection Officer/DPO at [Databeskyttelsesraadgiver@prima-care.dk](mailto:Databeskyttelsesraadgiver@prima-care.dk).

You also have the right to complain about PrimaCare's processing of your personal information to the Danish Data Protection Agency, Carl Jacobsens Vej 35, 2500 Valby, telephone: 33 19 32 00, e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).

## 8. Changes to the Privacy Policy

This privacy policy does not constitute an agreement between PrimaCare and you, but instead forms the basis for PrimaCare's duty to provide information under the data protection legislation. We reserve the right to make changes to this privacy policy from time to time in accordance with applicable data protection laws. In the event of changes, the date at the bottom of the privacy policy will be changed. The current privacy policy will be available on our website. In the event of significant changes to the privacy policy, you will receive an e-mail from PrimaCare with the updated policy.

Revision date: 10<sup>th</sup> April 2025