

# Data Protection Policy for Lindblad Communication

Last updated	June 17, 2019
Processor	Lindblad Communication
GDPR	- means the General Data Protection Regulation.
Responsible Person DPO	Helle Lindblad

## 1. Data protection principles

Lindblad is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## 2. General provisions

- a. This policy applies to all personal data processed by Lindblad.
- b. The Responsible Person DPO shall take responsibility for Lindblad's ongoing compliance with this policy.
- c. This policy shall be reviewed periodically.

## 3. Lawful, fair and transparent processing

- a. To ensure the data processing is legal, fair and transparent, Lindblad must, on request, present a persons registered data.
- b. The Register of Systems shall be reviewed periodically.
- c. Individuals have the right to access their personal data and any such requests made to Lindblad shall be dealt with in a timely manner.

## 4. Lawful purposes

- a. All data processed by Lindblad must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests – see <https://www.datatilsynet.dk/> guidance for more information.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Lindblad's systems.

## 5. Data minimisation

- a. Lindblad shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 6. Accuracy

- a. Lindblad shall take reasonable steps to ensure personal data is accurate.

## 7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Lindblad shall delete any personal data on demand of the persons with registered data.

## 8. Security

- a. Lindblad shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Lindblad shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to [www.datatilsynet.dk](http://www.datatilsynet.dk).

END OF POLICY