

Last updated:  
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## BORG Automotive A/S Privacy Policy

### 1. Introduction

This policy describes how BORG Automotive A/S collects and processes personal data as part of our business operations.

We are committed to ensuring the confidentiality and integrity of data from customers, suppliers, employees, and other business partners. All data is handled in accordance with the European General Data Protection Regulation (GDPR) and other applicable data protection regulations.

### 2. Data Controller

BORG Automotive A/S is the controller of the processing activities described in this privacy policy.

If you have any questions to our privacy policy or how we process your data, please contact:

BORG Automotive A/S  
Funder Dalgårdsvej 12  
8600 Silkeborg  
CVR: 87322416  
info@borgautomotive.com

### 3. Processing activities

At BORG Automotive A/S, we process your personal information when you contact us via email, letter, our website, social media, or in connection with the purchase or fulfillment of contracts and agreements.

The personal information you provide to us—whether digitally or in paper form—is processed by our employees according to its purpose and relevance. Only authorized employees have access to your personal information and any related files.

More detailed descriptions of specific processing activities are outlined in the subsections below.

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P: +45 86 80 11 77  
E: info@borgautomotive.com  
W: www.borgautomotive-group.com

### 3.1. Sales of goods & services

In connection with the sale and delivery of goods and services, we process personal data to manage orders, maintain customer relationships, and ensure correct delivery, invoicing, and follow-up. This processing is necessary to fulfill our contractual obligations and provide good customer service.

#### 3.1.1. Categories of personal data

We may process the following categories of personal data:

- Name
- Job title or position
- Work email address
- Work telephone number
- Company name and address
- Information necessary to carry out deliveries or service activities

This information is generally collected directly from you, your employer, or other parties involved in the cooperation.

#### 3.1.2. Legal basis

The legal basis for processing personal data for these purposes is Article 6(1)(b) of the GDPR, as the processing is necessary for fulfilling contractual obligations, and Article 6(1)(f), based on our legitimate interest in managing customer relationships.

#### 3.1.3. Recipients of personal data

Personal data may be disclosed to relevant external recipients, including but not limited to business partners who require the information to perform specific transactions or services—such as freight, repairs, or external accounting activities—as well as IT suppliers (data processors) who store and process personal data on our behalf. Such disclosures may be necessary to fulfil the purposes described above and to ensure a lawful basis for processing, as set out in the section on legal basis. We have entered into data processing agreements with all such data processors to ensure that processing is carried out in accordance with applicable data protection legislation.

#### 3.1.4. Retention

To manage customer relationships and support the sale of goods and services, personal data is stored in our CRM system for one year after the contractual relationship has ended. In our ERP system, data is retained for five years from the end of the financial year in which the relevant transaction occurred, in accordance with Danish bookkeeping legislation.

### 3.2. Newsletters and marketing communication

You can sign up to receive newsletters and marketing materials from the companies within the BORG Automotive Group about our products and services, new additions to our range, product launches, and special promotions and events.

When you sign up for one or more of our newsletters or to receive any other type of marketing material, we process the personal data you submit as part of the signup in order to document our compliance with applicable legislation and to send you the materials and information you have requested.

By signing up for our newsletters, you may choose to receive material from the following BORG Group entities:

- BORG Automotive Reman
- BORG Automotive Newman / NK

The consent to receive newsletters or other marketing materials from the BORG Automotive Group can be withdrawn just as easily as it is given. See more information about consent in section 4.

#### 3.2.1. Categories of personal data

We may process the following categories of personal data:

- Name
- Email address
- Company name
- Country
- Preferred language
- Purchase history if you represent an existing customer
- Interest (business area within BORG Automotive Group)
  - BORG Automotive Reman
  - BORG Automotive Newman and/or NK

We also collect information about email delivery, when emails are opened, which links you click, and whether you access them from a mobile device or desktop, including the operating system and email client.

This data helps us analyze the effectiveness of our newsletters and optimize future content—for example, by adjusting topics and their order to better match your interests.

#### 3.2.2. Legal basis

The legal basis for processing personal data for these purposes is Article 6(1)(a) of the GDPR, as consent has been given to receive newsletters and other marketing materials.

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### 3.2.3. Recipients of personal data

Personal data processed for newsletter distribution are stored in our internal systems and handled by relevant IT suppliers (data processors) who provide the technical platforms used to manage and send newsletters. These suppliers process the data solely on our behalf and according to our instructions. Such disclosures may be necessary to fulfil the purposes described above and to ensure a lawful basis for processing, as set out in the section on legal basis.

### 3.2.4. Retention

If consent to receive newsletters or other marketing material from BORG Automotive Group is withdrawn, we will stop sending such information. Personal data is retained for one year from the end of the year in which the consent was withdrawn or became invalid, to document that a valid consent was in place when the material was sent.

### 3.3. Websites, webshops & customer portals

When you visit websites operated by BORG Automotive A/S we process personal data collected through cookies and similar tracking technologies.

Moreover, we use the tool Sentry to detect and fix technical errors on the website. When an error occurs, the system collects technical information such as error messages, browser and device details, and which part of the website the error happened on. IP addresses and other direct identifiers are anonymized so that no more data than necessary is stored. The information is used solely to ensure stable operation and improve user experience.

We use the data to manage our websites, respect your cookie preferences, and ensure that the sites function properly and securely.

If you submit a request to us through one of the contact forms on the websites listed below, we process the information you submit. By using a contact form, you consent to being contacted by BORG Automotive A/S through the contact information you have submitted in case this is needed to solve your request.

By creating an account in BORG Automotive Group's customer portal or one of our webshops, you agree to receive service emails and be contacted about practical and technical matters related to your use of the platform.

This privacy policy covers the following websites including all subdomains:

- <https://borgautomotive-group.com>

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### 3.3.1. Categories of personal data

We may process the following categories of personal data:

- Electronic identification data such as IP address, browser information, cookies, etc.
- Information about your website preferences (cookie consent, language settings, etc.)
- Information about your use of the website, e.g., how you navigate the site and which links you click
- If relevant, the username used to log in to our customer portal or webshops
- If relevant, the information you supply when using the contact form such as name, email, phone, company as well as the content of your enquiry.

For further information about cookies and cookie consent, please refer to the cookie information available on all websites.

### 3.3.2. Legal basis

The legal basis for processing personal data related to our websites is Article 6(1)(f) of the GDPR, as it is necessary to maintain an effective, stable, relevant, and secure site. For our web shops, the legal basis is Article 6(1)(b), as the processing is required to fulfill contractual obligations.

### 3.3.3. Recipients of personal data

Personal data is disclosed to our IT suppliers (data processors), who store and process data on our behalf in accordance with our instructions, as well as to relevant third parties who support the operation of our websites and services, such as providers of cookies and similar technologies, and business partners assisting with the fulfilment of transactions (e.g. freight, logistics, or other service providers). Such disclosures may be necessary to fulfil the purposes described above and to ensure a lawful basis for processing, as set out in the section on legal basis.

### 3.3.4. Retention

The general retention period for personal data collected through our webshop is one year after the customer relationship ended. The retention period for personal data collected through our websites via cookies depends on the purpose and the specific cookie. For further information about cookies and cookie consent, please refer to the cookie information available on all websites.

## 3.4. Social Media

BORG Automotive Newman and the companies within the BORG Automotive Group maintain several accounts on LinkedIn and Facebook,

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where users can view content or interact through likes and comments.

When you visit or interact with our company profiles on these social media platforms, a joint controllership exists between us and the platform providers regarding the use of the insights and analytics tools made available by the platforms.

LinkedIn Ireland Unlimited Company  
Wilton Plaza, Wilton Place  
Dublin 2  
Ireland

Meta Platforms Ireland Ltd  
4 Grand Canal Square Grand Canal Harbour  
Dublin 2  
Ireland

Our purpose for using the insights and analytics provided by the social media platforms is to target relevant audiences and analyze the reach of our campaigns and other online content, as well as how users interact with our websites when accessing them through links posted on social media.

#### **3.4.1. Legal basis**

The legal basis for our processing of your personal data is article 6(1)(f) of the General Data Protection Regulation as we pursue our legitimate interest in administrating our company pages and to market our products through social media.

#### **3.4.2. Joint controllership**

We have entered into joint controllership agreements with the relevant social media platforms to define the respective parties' responsibilities to comply with the obligations imposed on data controllers in the GDPR.

You can find joint controllership agreement with LinkedIn and Meta Platforms here:

[LinkedIn - Joint Controller Addendum](#)

[Facebook - Joint Controller Addendum](#)

Regarding processing of your personal data, where the social media provider is an independent data controller, you may find further information on their processing of your personal data here:

[www.linkedin.com/legal/privacy-policy](http://www.linkedin.com/legal/privacy-policy)

<https://www.facebook.com/privacy/policy>

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The social media providers are individually responsible for ensuring a legal basis for how they process your personal data where the social media provider has not received any personal data from us.

### **3.5. Suppliers and other business partners**

We process personal data about contact persons at our suppliers and other business partners to manage cooperation, ensure proper delivery of goods and services, and maintain effective communication in connection with our business relationships.

#### **3.5.1. Categories of personal data**

The types of personal data we typically process include:

- Name and job title
- Company name and contact details
- Work email address and telephone number
- Address or place of business
- Information relevant to the specific collaboration or agreement

This information is usually collected directly from you, your employer, or from other companies within our group.

#### **3.5.2. Legal basis**

The legal basis for processing personal data for these purposes is Article 6(1)(b) of the GDPR, as the processing is necessary for fulfilling contractual obligations, and Article 6(1)(f), based on our legitimate interest in managing relationships with suppliers and other business partners.

#### **3.5.3. Recipients of personal data**

Personal data may be shared with other companies within our corporate group when relevant for administrative or operational purposes. In addition, information may be disclosed to external IT service providers (data processors) who store and process data on our behalf in accordance with our written instructions, as well as to other relevant business partners where necessary to support our cooperation and delivery of goods and services. Such disclosures may be necessary to fulfil the purposes described above and to ensure a lawful basis for processing, as set out in the section on legal basis.

#### **3.5.4. Retention**

Personal data relating to suppliers and other business partners is retained for up to five years from the end of the year in which the last transaction or collaboration took place, unless a longer retention period is required by law or necessary to establish, exercise, or defend legal claims.

### 3.6. Recruitment

When you apply for a role at BORG Automotive A/S, or if you are referred to us as a potential candidate (for instance, by a recruitment partner or headhunter), we collect and use your personal information to evaluate your qualifications and suitability in comparison with other applicants, in order to select the person we determine to be the best match for the position.

#### 3.6.1. Categories of personal data

- Name
- Email address
- Telephone number
- Address
- Application and CV, including information on your educational background, current and prior employment, specific skills and competencies as well as any other information provided by you in your application or CV or otherwise during the recruitment process.
- Skills and personality test results
- References

We will primarily obtain the information from you. However, we may collect information from publicly available sources, such as open parts of your profiles on social media. Furthermore, we may obtain information from people whom we have your consent to contact for references.

#### 3.6.2. Legal basis

The legal basis for processing personal data for recruitment purposes is Article 6(1)(f) GDPR, as BORG Automotive has a legitimate interest in identifying, evaluating, and hiring qualified candidates.

#### 3.6.3. Recipients of personal data

We share personal data with our IT service providers, who act as data processors and handle the information on our behalf in accordance with our instructions. When relevant, data may also be shared with other external partners, such as recruitment agencies, auditors, or similar service providers, to the extent necessary for them to perform their tasks for us. Such disclosures may be necessary to fulfil the purposes described above and to ensure a lawful basis for processing, as set out in the section on legal basis.

#### 3.6.4. Retention

If you are offered employment with BORG Automotive A/S, the personal information collected during the recruitment process will be transferred to your personnel file and managed in accordance with our Employee Privacy

Notice, which will be made available to you when you start your employment.

For candidates who are not offered a position, we retain personal data for six months after the recruitment process has concluded. If you have uploaded your CV to our job bank, you will be asked every six months whether you wish to remain registered. If you do not respond or decline, your data will be deleted.

### **3.7. Financial management**

In connection with our financial administration, we process personal data relating to contact persons at our customers and suppliers. The purpose of this processing is to manage invoicing, payments, reconciliations, and to respond to financial inquiries related to our business relationships.

As part of our statutory bookkeeping obligations, personal data may also appear in accounting records and supporting documentation, such as invoices and transaction records.

#### **3.7.1. Categories of personal data**

The personal data we process typically includes:

- Name and contact details (e.g., work email address and telephone number)
- Company name and address
- Job title or position
- Information necessary to manage invoicing and payment processes

#### **3.7.2. Legal basis**

The processing of personal data for financial administration is based on Article 6(1)(b) of the GDPR, as it is necessary for fulfilling contractual obligations, and Article 6(1)(c), as it is required to comply with the Danish Bookkeeping Act and other applicable accounting laws. Processing is additionally carried out under Article 6(1)(f) based on our legitimate interest in managing customer and supplier relationships and ensuring proper financial administration.

#### **3.7.3. Recipients of personal data**

Personal data may be disclosed to external auditors, accounting partners, and IT service providers (data processors) who assist us with bookkeeping, financial systems, and statutory audits. These parties process the data solely on our behalf and in accordance with our instructions. Such disclosures may be necessary to fulfil the purposes described above and to ensure a lawful basis for processing, as set out in the section on legal basis.

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#### 3.7.4. Retention

Personal data processed for financial and bookkeeping purposes is retained for up to five years from the end of the financial year in which the relevant transaction took place, in accordance with the Danish Bookkeeping Act and other applicable accounting regulations. Data may be stored for a longer period if required by law or if necessary to establish, exercise, or defend legal claims.

#### 3.8. Other situations

If we interact with you for purposes other than those described in the sections above – for example, when you contact us by phone, email, or through our website with general inquiries, requests, or other matters – we will process personal data as necessary to handle and respond to your query.

##### 3.8.1. Categories of personal data

The personal data we typically process includes:

- Name
- Email address
- Telephone number
- Postal address
- Any additional information you provide to us in connection with your inquiry
- Information received from third parties relevant to the matter in question

##### 3.8.2. Legal basis

Our processing of personal data in these situations is generally based on Article 6(1)(f) of the General Data Protection Regulation (GDPR), as it is necessary for our legitimate interest in managing and responding to inquiries, requests, or other communications. Depending on the nature of the correspondence, other legal bases may apply, such as Article 6(1)(b) when the processing is necessary for the performance of a contract or to take steps prior to entering a contract.

##### 3.8.3. Recipients of personal data

Personal data may be disclosed to relevant external parties, such as professional advisers, legal representatives, or public authorities, where necessary to handle the specific matter. We may also share data with our IT service providers (data processors), who store and process data on our behalf in accordance with our instructions. Such disclosures may be necessary to fulfil the purposes described above and to ensure a lawful basis for processing, as set out in the section on legal basis.

#### 3.8.4. Retention

If our interaction with you involves financial transactions, we will retain the information for five years from the end of the year of the latest transaction to comply with our obligations pursuant to the Danish Bookkeeping Act. Otherwise, we will retain the information for one year from the end of the year of the latest interaction, if we have a lawful basis for such retention, as set out in the section on legal basis.

#### 4. Consent

In most cases, our personal data processing is based on legal requirements other than your consent.

To the extent that we may have obtained consent from you for specific processing of your personal data, it applies that you have the right to withdraw your consent at any time. You can do this by contacting us at the contact details listed above in point 1.

If you choose to withdraw your consent, it does not affect the legality of our processing of your personal data based on your previously given consent and up to the time of the withdrawal. Therefore, if you withdraw your consent, it will only take effect from this time forward.

#### 5. Transfers to third countries

In certain cases, we transfer personal data to recipients outside the EU/EEA, including our marketing partners such as social media platforms, or between entities within our group. In these situations, we ensure that appropriate safeguards are in place, including the use of standard contractual clauses approved by the European Commission or other measures that ensure an adequate level of data protection.

#### 6. Your rights

According to the General Data Protection Regulation and the Danish Data Protection Act, you have several rights in relation to how we process your personal data:

- The right to request access to the personal data
- The right to rectification of inaccurate personal data and to have incomplete personal data completed
- The right to erasure of personal data
- The right to restriction of processing of the personal data
- The right to object, on grounds relating to your particular situation, at any time to processing of personal data which is based on GDPR article 6(1)(f). If you object, we may no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms or if

processing is necessary for the establishment, exercise or defense of legal claims.

If you wish to exercise any of these rights, please contact us by using the contact details found in section 2.

For the areas where the processing of personal data is based on your sign-up, you also have the right to withdraw this at any time by using the contact information provided in section 2. If you withdraw your sign-up, it will not affect the processing of personal data done before your withdrawal of the sign-up.

You can find more information about your rights in the Danish Data Protection Agency's guidance on the rights of data subjects.

You may file a complaint about our processing of your personal data with the Danish Data Protection Agency (Datatilsynet), Carl Jacobsens Vej 35, 2500 Valby, e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk), phone number [+ 45 33 19 32 00](tel:+4533193200)

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