

2023

OUR DATA PROCESSING ACTIVITIES

Introduction

Implement Consulting Group (Implement) is highly committed to protecting the confidentiality, integrity, transparency 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 and data processor

When Implement processes personal data in connection with the provision of consultancy services, we assess, together with our customers, whether we are a data processor on behalf of the customer or a separate data controller.

If we process personal data on behalf of our customers and in accordance with customer instructions, we will be considered as data processors, and the customer and Implement enter into a data processing agreement.

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:

Customer and contract management

General consulting tasks, including customer business development

Market research and industry surveys

Marketing and customer relationship management (CMS)

External whistle-blower platform

Management of suppliers and business partner

Course activities

Event activities

Newsletters

Customer and contract management

Data controller	Purpose	Data subject(s)	Categories 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 customer.	Management of customer relations, including financial and contract administration.	Clients and customers, including their employees.	Non-sensitive personal data, i.e. name, position and contact details.	Processing is 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 transferred to other Implement group companies in accordance with the terms laid down in Implement's intragroup data processing agreement. Personal data may also be transferred to subcontractors who are directly involved in the project for the customer.

General consulting tasks, including customer business development

Data controller	Purpose	Data subject(s)	Categories 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 customer.	Provision of consultancy services to customers, including data collection, data analysis for business development purposes and implementing and/or operating business applications.	Customers' employees, management, end customers, end users or suppliers.	Non-sensitive personal data, i.e. name, position and contact details. Special categories of personal data will only be processed in special cases and will be based on consent.	Processing is necessary in order for Implement to pursue its legitimate interests in being able to deliver consultancy services to its customers, cf GDPR, Article 6(1)(f). If Implement processes special categories of personal data, cf GDPR, Article 9(1), the processing will also be based on a consent, cf GDPR, Articles 6(1)(a) and 9(2)(a).	The data subjects and/or the customer.	Five years after the relevant project for the customer has been completed.	Personal data may be transferred to other Implement group companies in accordance with the terms laid down in Implement's intragroup data processing agreement. Personal data may also be transferred to subcontractors who are directly involved in the project for the customer.

Market research and industry surveys

Data controller	Purpose	Data subject(s)	Categories of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company conducting the survey.	Gaining knowledge in a specific industry or business area for marketing and business development purposes.	Survey respondents, e.g. experts or professionals within a specific industry.	Contact information and survey replies.	Processing is necessary in order for Implement to pursue its legitimate interests strengthening our industry knowledge and developing our business and services, cf GDPR, Article 6(1)(f).	The data subjects.	As long as data are necessary for conducting the survey and market research.	Personal data may be transferred to other Implement group companies in accordance with the terms laid down in Implement's intragroup data processing agreement. Implement uses a third-party survey provider who will process the personal data on behalf of Implement.

Marketing and customer relationship management (CMS)

Data controller	Purpose	Data subject(s)	Categories of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company that has a relation to the customer, potential customer or their employees	Marketing activities, including customer relationship management (CRM) system. Processing in the CRM system has the purpose of creating an overview of our network, identifying marketing opportunities, customising and planning events.	Customers and potential customers, including their employees.	Non-sensitive personal data, i.e. name, position, contact details, employer, relation to employees in Implement, participation in events and involvement in previous projects.	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). Implement can contact data subjects based on their consent for direct marketing. Data subjects have the right to object to personal data processing if we process the personal data based on legitimate interests or for direct marketing purposes, cf Article 21(2) of the GDPR. See more below under “Your right to object and withdraw consent”.	Customers, including customers' employees, and public sources such as cvr.dk, biq.dk, greens.dk and linkedIn.com	As long as data are necessary for the listed purposes, or until the data subject requests a deletion of the data.	Personal data may be transferred to other Implement group companies in accordance with the terms laid down in Implement's intra-group data processing agreement.

External whistle-blower platform

Data controller	Purpose	Data subject(s)	Categories of personal data	Legal basis	Source	Retention period	Disclosure to third parties
Implement Consulting Group P/S, CBR: 32767788 (Denmark).	Management of Implement's external whistleblower system.	Customers, customers' employees, Implement's partners or employees, business partners and business partners' employees.	Name, contact details and personal data contained in the report regardless of whether it is an internal or external reporting channel.	Processing is necessary 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), and the Danish Data Protection Act, section 8(3).	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.

Management of suppliers and business partner

Data controller	Purpose	Data subject(s)	Categories 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 and contact details.	<p>Processing is necessary in order for Implement to pursue its legitimate interests in being able to evaluate the business relationship, cf GDPR, Article 6(1)(f).</p> <p>When the supplier or business partner is a natural person, processing of personal data is necessary for the performance of contracts with the supplier or business partner, cf GDPR, Article 6(1)(b).</p>	The data subjects.	As long as data are necessary for the listed purposes, or until the data subject requests deletion of the data.	Personal data may be transferred to other Implement group companies in accordance with the terms laid down in Implement's intra-group data processing agreement.

Course activities

Data controller	Purpose	Data subject(s)	Categories of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company which organises the course.	Management of courses for customers and at Implement Learning Institute (ILI).	Course participants and course instructors.	Non-sensitive personal data, i.e. name, position and contact details.	<p>Processing is necessary in order for Implement to pursue its legitimate interests in being able to evaluate the course, cf GDPR, Article 6(1)(f).</p> <p>Processing of personal data is necessary for the performance of contracts with the course instructors, cf GDPR, Article 6(1)(b).</p>	The data subjects.	Five years from the date on which the participant signed up for the course.	Implement might disclose personal data to third parties, such as location providers or booking companies, if necessary, in order to hold the course.

Event activities

Data controller	Purpose	Data subject(s)	Categories of personal data	Legal basis	Source	Retention period	Disclosure to third parties
The company which organises the course.	Administration of events, recruitment and marketing, if relevant.	Applicants for events and participants in events.	Non-sensitive personal data, i.e. name, position and contact details.	<p>Processing is necessary in order for Implement to pursue its legitimate interests in being able to evaluate the event, cf GDPR Article 6(1)(f).</p> <p>For recruitment purposes, read our Consent and Privacy Policy for recruitment at Implement Consulting Group.</p>	The data subjects.	<p>As long as data are necessary for the listed purposes, or until the data subject requests deletion of the data.</p> <p>For recruitment purposes, read our Consent and Privacy Policy for recruitment at Implement Consulting Group.</p>	<p>Implement might disclose personal data to third parties, such as location providers or booking companies, if necessary, in order to hold the event.</p> <p>If the event is co-hosted by Implement and another company or companies, Implement may disclose personal data to such other company/companies for the purpose of hosting the event.</p>

Newsletters

Data controller	Purpose	Data subject(s)	Categories 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 and contact details.	Subscribers provide their consent to receiving newsletters when subscribing. Processing of personal data is 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 terminate the subscription.	Implement does not disclose any personal data to third parties unless we are under a legal obligation to do so. Implement uses a thirdparty provider to send out newsletters. This third party will process the personal data on behalf of Implement.

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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