

A photograph of an industrial facility, possibly a power plant or refinery, during sunset. A tall, slender smokestack stands prominently on the left, with a smaller structure at its base. To the right is a large, modern building with a corrugated metal roof and a long row of windows reflecting the orange light of the setting sun. The foreground is dominated by a grassy field with a muddy, reflective path on the left. A black fence runs across the middle ground. The sky is filled with soft, orange and yellow clouds.

BWSC Data Privacy Policy

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1. Purpose

Burmeister & Wain Scandinavian Contractor A/S ("BWSC", "we", "us", or "our") and its subsidiaries (collectively, the "BWSC Group") are committed to protecting your personal data and ensuring transparency in how we process it.

This Privacy Policy explains how we collect, use, and protect your personal data when you interact with us, including when you visit our website.

2. What is Personal Data

Personal data means any information relating to an identified or identifiable natural person, including:

- Contact details (e.g., name, email, job title)
- Online identifiers (e.g., IP address, cookies)
- Application materials (e.g., CV, cover letter)

3. Scope of This Policy

This Privacy Policy applies to all processing of personal data carried out by BWSC, including but not limited to:

- Operation of our websites and digital platforms
- Business relationships with customers, suppliers, and partners (B2B)
- Recruitment and hiring processes
- Communication and correspondence
- Marketing activities, including newsletters and events
- Use of IT systems, tools, and platforms involving personal data

This policy applies regardless of how personal data is collected, whether:

- Directly from the individual
- Indirectly from third parties or public sources
- Automatically through systems and technologies

Where specific systems or processes require additional detail, supplementary privacy notices may be provided.

4. Data Controller

Burmeister & Wain Scandinavian Contractor A/S
Gydevang 35
DK-3540 Allerød
Denmark
Phone: +45 4814 0022
Email: bwsc@bwsc.dk

This policy also applies to processing of personal data in the United Kingdom, where applicable. BWSC acts as data controller in accordance with:

- Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)
- The Danish Data Protection Act
- The UK GDPR
- The UK Data Protection Act 2018

4.1 Contact for Data Protection Matters

BWSC has not appointed a Data Protection Officer under Article 37 GDPR.

All data protection matters are handled by the Compliance function.

If you have any questions regarding this Privacy Policy or wish to exercise your rights, please contact:

BWSC's Compliance Officer

Email: bwsc@bwsc.dk

5. Categories of Data Subjects

We process personal data relating to:

- Visitors to our website
- Employees of business partners, suppliers, and clients (B2B contacts)
- Employees and former employees
- Job applicants
- Newsletter subscribers

Processing of personal data relating to these categories is carried out in accordance with the legal bases set out in Section 7.

6. Collection of Personal Data

a) Website visitors

We collect:

- IP address
- Browser and device information
- Usage data via cookies and similar technologies

b) B2B contacts

We collect:

- Name, job title
- Company name
- Work email and phone number
- Communication history

Typically collected through:

- Direct communication
- Business interactions

Personal data may also be obtained from publicly available sources, including professional networking platforms.

c) Job applicants

We collect:

- CV, cover letter
- Contact details
- Education and work history
- References (if provided)

d) Newsletter subscribers

We collect:

- Name
- Email address
- Subscription preferences
- Interaction data (e.g., email opens, clicks)

The collection of personal data is based on the legal bases described in Section 7 below, depending on the specific purpose of processing.

7. Purposes and Legal Basis

Website

Purpose: Website functionality, analytics, security

Legal basis:

- Consent (cookies) – Article 6(1)(a)
- Legitimate interests – Article 6(1)(f)

B2B Contacts

Purpose:

- Business communication
- Contract management
- Relationship management

Legal basis:

- Legitimate interests – Article 6(1)(f)
- Contract – Article 6(1)(b)

Recruitment

Purpose:

- Assess candidates
- Manage hiring processes

Legal basis:

- Pre-contractual steps – Article 6(1)(b)
- Legitimate interests – Article 6(1)(f)
- Consent (if retaining CVs for future roles) – Article 6(1)(a)

Newsletter

Purpose:

- Send company news and updates

Legal basis:

- Consent – Article 6(1)(a)

You may withdraw consent at any time.

Additional transparency

Where processing is based on legal obligations (Article 6(1)(c)), BWSC processes personal data to comply with applicable laws, including employment, tax, and regulatory requirements.

Where provision of personal data is a contractual or statutory requirement, failure to provide such data may result in our inability to enter into or perform a contract or comply with legal obligations.

8. Cookies and Tracking Technologies

We use cookies for:

- Necessary website functionality
- Analytics and performance
- Marketing (only with consent)

Legal basis:

- Necessary cookies – Legitimate interests (Article 6(1)(f))
- Analytics and marketing cookies – Consent (Article 6(1)(a))

Cookies may include first-party and third-party cookies.

Third-party providers (e.g., analytics or marketing platforms) may process data independently as controllers.

A consent management platform (CMP) is used to collect and manage cookie preferences in compliance with applicable ePrivacy rules.

You can change or withdraw your consent at any time via the website.

Further details are available in our Cookie Policy.

9. Employees

We process personal data relating to employees and former employees as part of managing the employment relationship.

Categories of personal data

We may process:

- Identification data
- Contact details
- Employment details
- Payroll and financial data
- Bank account details
- National identification number (CPR number), where required
- Pension and insurance information
- Absence records

We may also process special categories of personal data, such as:

- Health-related information

Purposes of processing

We process employee data for the following purposes:

- Administration of employment contracts
- Payment of salary, pension, and benefits
- Compliance with legal obligations (e.g., tax, employment law)
- Management of absence, including sick leave
- Workforce administration and planning
- IT access, security, and system management

Legal basis

We process employee data based on:

- Contract – Article 6(1)(b) GDPR (employment relationship)
- Legal obligation – Article 6(1)(c) (e.g., tax, reporting, employment law)
- Legitimate interests – Article 6(1)(f) (e.g., internal administration)

Where special categories of data (e.g., health data) are processed:

- Employment and social security law obligations – Article 9(2)(b)
- Establishment, exercise, or defense of legal claims – Article 9(2)(f) (if applicable)

9.1. Retention

Employee data is retained in accordance with legal requirements, including:

- Payroll and accounting data: typically 5 years (per Danish bookkeeping laws)
- Employee records: retained during employment and for a defined period thereafter
- Health-related data: retained only as long as necessary for the specific purpose

9.2. Sharing of employee data

Employee data may be shared with:

- Public authorities (e.g., tax authorities)
- Pension providers and insurance companies
- Payroll and HR system providers
- External advisors (e.g., auditors, legal counsel)

All recipients are subject to appropriate data protection safeguards.

10. Sharing of Personal Data

We may share personal data with:

- Companies within the BWSC Group
- Parent company: Mitsui E&S Holdings Co., Ltd.
- IT providers (e.g., hosting, recruitment systems, email platforms)
- Professional advisors (where necessary)

All processors are bound by data processing agreements.

Legal basis for sharing:

- Contract – Article 6(1)(b), where sharing is necessary to perform a contract
- Legal obligation – Article 6(1)(c), where required by law
- Legitimate interests – Article 6(1)(f), for internal administration and business operations

11. International Transfers

Personal data may be transferred outside the EU/EEA and the United Kingdom.

We ensure appropriate safeguards, including:

- EU Standard Contractual Clauses (SCCs)
- UK International Data Transfer Agreement (IDTA), where applicable
- Transfers to countries with adequacy decisions
- Transfer risk assessments in accordance with applicable legal requirements

Further information on safeguards can be obtained upon request.

12. Data Retention

We retain personal data only as long as necessary:

- Website data: According to cookie retention periods
- B2B contacts: Duration of business relationship + reasonable period thereafter
- Recruitment:
 - Up to 6 months after process completion
 - Longer only with candidate consent
- Newsletter: Until you unsubscribe
- Employees: see paragraph 9

Retention periods are determined based on:

- Legal obligations – Article 6(1)(c)
- Contractual requirements – Article 6(1)(b)
- Legitimate interests – Article 6(1)(f), including documentation and dispute handling

13. Your Rights

You have the right to:

- Access your personal data
- Rectify inaccurate data
- Erase your data
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent at any time
- You also have the right to lodge a complaint with a supervisory authority

To exercise your rights, contact: bwsc@bwsc.dk

Your rights may be subject to conditions and limitations depending on the legal basis for processing.

14. Automated Decision-Making

BWSC does not carry out automated decision-making, including profiling, that produces legal or similarly significant effects.

15. Data Security

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, or misuse.

Processing for security purposes is based on BWSC's legitimate interests (Article 6(1)(f)) in ensuring the confidentiality, integrity, and availability of systems and data.

16. Complaints

You may contact BWSC's Compliance Officer:
Email: bwsc@bwsc.dk

You may also lodge a complaint with:

- Datatilsynet (Denmark) – www.datatilsynet.dk
- Information Commissioner's Office (ICO) (United Kingdom) – www.ico.org.uk

17. Changes to This Policy

We may update this Privacy Policy to reflect legal or operational changes. Significant updates will be communicated on our website.