

Privacy Information Notice

This Privacy Information Notice provides you with information on how the companies of the group controlled by Louis Poulsen A/S collects and processes your data. Depending on your location, various data protection laws may apply to the processing of your personal data, and different information may be required to be provided to you.

- If you are in: Japan: please refer to this [Privacy Notice for Japan Residents](#).

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Privacy Notice for Japan Residents

This privacy notice (“Notice” or “Privacy Notice”) describes how Louis Poulsen A/S (“Louis Poulsen”) processes your personal data collected through, *inter alia*, the website www.louispoulsen.com, (the “Site”), in Louis Poulsen directly operated stores (the “Stores”) or through its Affiliates, and events to which Louis Poulsen and/or an Affiliate takes part.

In this Notice:

“Affiliates”	means Louis Poulsen A/S affiliated entities listed in the Louis Poulsen Companies annex below
“Applicable Data Protection Laws”	means Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (“GDPR”), and any other applicable data protection legislation or equivalent provision, in particular Japanese data protection laws, including the Act on the Protection of Personal Information (“APPI”).
“Group” or “companies of the Group”	means the group of companies to which Louis Poulsen and its Affiliates belong. An updated list of the companies of the Group will be provided to you upon request
“Personal Data”	means any information relating to an identified or identifiable natural person
“you” or “your”	refers to you as the natural person whose Personal Data are collected, when you either purchase a product through the Site or in a Store, or use a service offered by Louis Poulsen A/S and/or its Affiliates or visit the Site

1. Data Controller and Processing activities

Each of the following sections describes the processing activities carried out by Louis Poulsen, detailing:



the data controller



the categories of Personal Data



the purposes of processing and the relevant legal basis



the applicable retention period

1.1 When you purchase our products or services

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
For purchases on our Site: Louis Poulsen	<ul style="list-style-type: none"> Personal information (name, surname, tax code) Country of residence Zip code and postal address Contact details (e.g. phone number, e-mail address) Type of user (B2B or B2C) For B2B customers: Profession, e-mail address, work e-mail address, work telephone number, name of the company/business/organization you work for Invoice data Payment data 	Sale of products and provide sale and connected services, such as delivery services. Legal basis: performance of a contract. If you do not provide the data, the company will not be able to fulfil the contract.	Up to 10 years (for invoicing and accounting purposes) after the end of the contractual relationship. At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.
For purchases in Store: Louis Poulsen		Provision of after-sale services including fraud prevention, returns, guarantee and customer support. Legal basis: performance of a contract. If you do not provide the data, the company will not be able to fulfil the contract.	1 year following completion of the purchase. At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.
For after-sale services: Louis Poulsen		Provision of customer satisfaction questionnaires and surveys. Legal basis: legitimate interest of the company to assess customer satisfaction, adequately balanced with your interests in light of the limits of the data processing. You may object to this processing, by writing to the contact details indicated in paragraph 6.	1 year following completion of the purchase. At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.

1.2 When you create an account, contact us or request/subscribe to a service

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
Louis Poulsen	<ul style="list-style-type: none"> Personal information (name, surname) Contact details (e-mail address, phone number, address) 	Create and manage your personal account on the Site; manage your requests and/or manage your subscription to our services.	Until you request the deletion of your account, or you unsubscribe to the service or as far as necessary to fulfill

	<ul style="list-style-type: none"> • Type of user (B2B or B2C) • Country of residence • For B2B customers: Profession, e-mail address, work e-mail address, work telephone number, name of the company/business/organization you work for • In case of requests: any other information you may share with us necessary to handle your request 	<p>Legal basis: performance of a contract. If you do not provide the data, the company will not be able to provide the service or handle your request.</p>	<p>your request, depending on which is applicable.</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>
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1.3 When you take part or consider to take part in a business project

If you interact with us in connection with your work/business (B2B user), the following applies to the processing of your Personal Data when you participate (or consider to participate) in a contract business project with Louis Poulsen (directly or through its Affiliates).

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
Louis Poulsen	<ul style="list-style-type: none"> • Qualification and type of B2B user. Profession • Personal information (name, surname) • Country of residence • Contact details (e.g. phone number, e-mail address) • Name of the company/business/organization you work for • Interactions with you and any other information shared in the context of the contract business project 	<p>Execute, manage and oversee the ongoing or potential contract business project with you</p> <p>Legal basis: performance of a contract, including pre-contractual phase and related negotiations carried out upon your request. If you do not provide your Personal Data, the company will not be able to enter or continue the business project.</p>	<p>Data are retained up to 10 years after the conclusion of the contract business project.</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>

1.4 To promote our business opportunities

If you share your Personal Data to explore a possible partnership, collaboration or business project with us, (B2B user), the following applies to the processing of your Personal Data for the promotion of business opportunities within the Group.

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
Louis Poulsen	<ul style="list-style-type: none"> • Qualification and type of B2B user. Profession • Personal information (name, surname) • Country of residence • Contact details (e.g. phone number, e-mail address) • Name of the company/business/organization you work for • Interactions with you and any other information shared in the context of the contract business project 	<p>Foster business opportunities between yourself and the other companies of the Group, on a business project basis, also by sharing your data with other companies of the Group.</p> <p>Legal basis: legitimate interest to enhance the business opportunity within the Group, adequately balanced with your interests considering the limits of the data processing. You may object to this processing, by writing to the contact details indicated in paragraph 6.</p>	<p>Data are retained up to:</p> <p>In case of B2B individuals that have an ongoing business relationship with us (e.g., involved in a business project): 7 years from the end of the business relationship.</p> <p>In case of B2B individuals that have expressed in written form (even via e-mail) an interest in entering into business with us: 7 years from the data collection.</p> <p>In case of B2B individuals who met us otherwise (e.g., in-person meetings, networking meetings, etc.): 18 months from the last interaction with such B2B individual (e.g., exchange of emails).</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>

1.5 When you register to an event or otherwise meet us

The following applies when you register to an event of Louis Poulsen and/or its Affiliates or in which Louis Poulsen and/or an Affiliate participate, either via an online form on the Site or directly on-site at the event or otherwise meet us (e.g., in-person meetings, networking events) and provide us with your business card or contact information for potential professional collaboration.

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
Louis Poulsen	<ul style="list-style-type: none"> Personal information (name, surname) Contact details (e-mail address, phone number, postal address) Type of user (B2B or B2C) Country of residence In addition for B2B customers: Profession, name of the company/business/organization you work for 	<p>Manage your registration to the event.</p> <p>Legal basis: performance of a contract. If you do not provide the data, the company will not be able to register you to the event.</p>	<p>For the duration of the event.</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>
Louis Poulsen	<ul style="list-style-type: none"> Image captured in photos and/or videos taken during the event 	<p>Use of your image, captured in photos and/or videos taken during the event, for the purposes specified in the release form for image usage that you signed or is made available to you.</p> <p>Legal basis: performance of a contract (release form).</p>	<p>For the duration established by the release form for image usage.</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>
Louis Poulsen	<p>In case of B2B individuals, when you register to an event or meet us otherwise (e.g., in-person meetings, networking events) for a possible professional collaboration:</p> <ul style="list-style-type: none"> Qualification as B2B user Personal information (name, surname) Contact details (e-mail address, phone number, postal address) Country of residence Profession Name of the company/business/organization you work for Interactions with the individual 	<p>Limited to B2B/professional individuals: contact you to enhance or start business opportunities on a project-specific basis.</p> <p>Legal basis: legitimate interest of the controller. You have the right to object to this processing, by writing to the contact detail indicated in paragraph 6</p>	<p>In case of B2B individuals who registered to an event: 7 years from the data collection</p> <p>In case of B2B individuals who met us otherwise (e.g., in-person meetings, networking meetings, etc.): 18 months from the last interaction with such B2B individual (e.g., exchange of emails)</p> <p>At the end of the retention period, data may be alternatively</p>

deleted or irreversibly anonymized.

1.6 When you send your application/CV

The following applies when you submit your CV or send an application through the career section of the Site to Louis Poulsen or one of its Affiliates or in any other ways (e.g., via LinkedIn, via e-mail, headhunter agencies, etc.).

As part of the application and selection process, we do not normally ask you to provide us with Personal Data that may reveal your health conditions, religious beliefs, sexual orientation, trade union membership, political opinions, criminal record or criminal charges. You are invited to not provide us with this kind of data.

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
Louis Poulsen	<ul style="list-style-type: none"> Personal information (name, surname) Contact details (e-mail address, phone number, postal address, country of residence) Data relating to your qualifications, education and professional career Photograph/personal portrait (if contained in CV) Date and place of birth (if contained in CV) Other personal information included in the CV/application you sent us 	<p>Manage the application/CV received via the Site or another channel for the selection process.</p> <p>Legal basis: performance of pre-contractual activities. If you do not provide the data, the company will not be able to handle your application process.</p> <hr/> <p>Share the application/CV with other companies of the Group to enable them to consider the application/CV for the selection process within their entities.</p> <p>Legal basis: legitimate interest to optimize the selection process by companies of the Group, adequately balanced with your interests in the light of the limits of the data processing. You may object to this processing, by writing to the contact details indicated in paragraph 6.</p>	<p>2 years from the date of collection, save for the applicability of the data retention period provided by the privacy information notice for employees and officers, if the candidate is hired.</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>

1.7 Marketing and profiling purposes

The following applies to marketing and profiling activities carried out in relation to you.

We may collect this data directly from you or from our partners or other third-party entities, in compliance with Applicable Data Protection Laws requirements.

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
Louis Poulsen	<ul style="list-style-type: none"> • Qualification as B2C or B2B user • Personal information (name, surname) • Country of residence, zip code and postal address • Contact details (phone number, e-mail address) 	<p>Marketing activities (<i>i.e.</i>, newsletter, promotional communications via e-mail, SMS, and ordinary mail, surveys, market searches) relating to products, services and initiatives.</p> <p>Legal basis: your consent. If you do not provide your consent, you will not receive marketing communications.</p>	<p>7 years from the consent</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>
	<ul style="list-style-type: none"> • Invoice data • Your preferences and interests • Your previous purchases and activities (including attendance to events) on the Site and in Store 	<p>Profiling activities.</p> <p>Legal basis: your consent. If you do not provide your consent, no profiling activities will be performed.</p>	<p>7 years from the consent</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>
	<p>Broad and non-invasive categories, including:</p> <ul style="list-style-type: none"> • Geographic area where you are located • Sales/purchase volume • Whether you are a consumer or a professional client 	<p>Perform customer segmentation based on non-invasive categories of data.</p> <p>Legal basis: legitimate interest to understand the users' preferences and, if marketing consent has been given, provide communications of products /services/events that may be of interest to the consumer, based on a high-level and non-intrusive customer segmentation that adequately balances the interests of the subjects. You have the right to object to this processing, by writing to the contact details indicated in paragraph 6.</p>	<p>7 years from the data collection</p> <p>At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.</p>

1.8 Social plug-ins and cookies

The Site allows interactions with third-party websites and social networks (e.g., Facebook, Instagram) through hyperlink, sharing buttons, social plug-ins and other similar instruments. For the data processing activities carried out on third-party websites, please refer to the privacy information notices published therein.

The Site can also collect certain browsing information (e.g., IP address, device and browser, navigation on the Site) via cookies and other tracking technologies, also of third parties.

These data may be collected:

- to ensure the proper functioning and security of the Site;
- to improve the Site and for analytics purposes;
- for tracking and profiling purposes.

For more information on how these data are collected, please refer to the [Cookie Policy](#).

Louis Poulsen may also request to share pictures posted by you on social media in our channels, including our Site, in our newsletter, ads, store environment, social media etc. upon your consent.

For more information: [Louis Poulsen Community](#).

1.9 Comply with legal obligations, exercise/defend our rights and other purposes

This paragraph describes the processing operations carried out by Louis Poulsen for the purpose of exercising its rights before a competent authority or to comply with legal obligations imposed on it.

 Controller	 Categories of Personal Data	 Purpose and legal basis of the processing	 Retention period
Louis Poulsen	Personal Data collected according to the previous sections.	Exercise and/or defense of a right before a competent authority (e.g. judicial, administrative) Performance of business operations (e.g., mergers and acquisitions) Internal auditing, reporting and other business/organizational purposes Legal basis: legitimate interest of the company. You have the right to object to this processing, by writing to the contact detail indicated in paragraph 6.	Statute of limitations, time strictly necessary to perform internal auditing, reporting and other business/organizational purposes (whichever shorter) and, in any case, retention shall not exceed 10 (ten) years from the termination of the contractual relationship, unless further retention is necessitated by ongoing disputes and/or retention period established for the fulfillment of the purposes listed in the previous sections
	Personal Data collected according to the previous sections.	Compliance with a legal obligation Legal basis: need to comply with a legal obligation.	Time necessary for the purpose of complying with the legal obligation

2. How your Personal Data are processed

Your Personal Data are processed through computer, automated and/or paper forms in compliance with the principles and provisions of the Applicable Data Protection Laws.

Personal Data are collected, elaborated, transferred and stored by using appropriate security measures (physical, logical and organizational) to protect them from possible breaches (such as destruction, loss, alteration, unauthorized disclosure or accidental or unlawful access to such personal data) and to ensure that processing is carried out only for the purposes described in this Notice.

3. Who your Personal Data can be disclosed to

Your Personal Data may be disclosed to third parties, where strictly necessary for each purpose of processing described in the previous paragraphs, in particular:

Service providers	Companies of the Group	Payment service providers	Other third parties
<p>Companies of the Group and third-party entities providing specific support activities/services in the marketing, market research, IT management and support, logistics, administrative, e-commerce, purchasing, customer care, events and public relations, compliance, insurance, HR, accounting area and business projects (e.g., IT consultant and system integrators, e-commerce and CRM platforms, customer care service providers, providers of reserved areas in the websites, etc.).</p> <p>These third parties have been appointed <u>data processors</u>.</p>	<p>Companies of the Group interested in fostering business opportunities with you, on a business project basis.</p> <p>Companies of the Group interested in receiving CVs/applications you sent us.</p>	<p>Providers of payment services or payment gateways/platforms used to purchase products through the Website (e.g. PayPal, Adyen, credit card service providers, banks, financial intermediaries, etc.).</p>	<ul style="list-style-type: none">• Our direct or indirect shareholders;• Third parties in the context of mergers /acquisitions/other extraordinary transactions that may involve the companies of the Group;• Independent professionals, such as lawyers and auditors;• Judicial and/or administrative authorities, law enforcement agencies.

You may request more detailed information on those subjects to whom your Personal Data may be disclosed by writing to the contact details as indicated in paragraph 6 (“*How to exercise your rights*”).

4. Transfer of Personal Data outside Japan or the EEA

For the purposes of the processing described in this Notice, your Personal Data may be transferred to countries outside Japan or the European Economic Area (“EEA”), including the United States, the People’s Republic of China and Singapore.



If that is the case, we ensure that all possible transfers outside Japan and/or the EEA will be made in such a way as to guarantee full protection of your rights and freedoms. For extra-EEA transfers, if no adequacy decision has been taken by the European Commission, the data transfers will be carried out by relying on appropriate safeguards, including conclusion of Standard Contractual Clauses. For data transfers outside Japan, if the Personal Information Protection Commission has not determined a country to have a level of protection equivalent to that of Japan, the data transfer will be carried out by taking the appropriate measures provided by the APPI, ensuring the recipient takes data protection measures that are no less protective than those stipulated by the APPI such as through appropriate binding agreements.



Please note that the United States, Japan, the United Kingdom, Switzerland and South Korea, countries in which some of the companies of the Group are established, benefit from adequacy decisions of the European Commission and therefore your data can be shared with those jurisdictions based on the adequacy decision.

5. Your rights

In accordance with the Applicable Data Protection Laws, and in particular with the provisions of the GDPR, your rights in relation to the Personal Data that we process under this Notice are the following:

	Access	you can obtain information about the processing of your Personal Data and a copy of that Personal Data.
	Rectification	if you believe that your Personal Data is inaccurate or incomplete, you may request that such data be corrected or modified by following your instructions.
	Erasure	except as provided for by applicable laws, you have the right to request the erasure of your Personal Data, when: (i) the data are no longer necessary for the purposes for which they were collected and processed; (ii) you withdraw your consent to the processing if processing is based on your consent; (iii) you object to the processing for direct marketing purposes or to the processing carried out for other purposes and there are no overriding legitimate grounds to continue with the processing; (iv) your data are processed unlawfully; (v) the erasure is required by law.
	Restriction	you may request the restriction of the processing of your Personal Data where: (i) you contest the accuracy of the Personal Data for the period necessary to verify their accuracy; (ii) the processing is unlawful and you request the restriction of their use instead of erasure; (iii) the controllers no longer needs the Personal Data for the purposes of the processing, but you require them for the establishment, exercise or defense of legal claims; (iv) you have objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override yours.
	Object	on grounds relating to your particular situation, you have the right to object to the processing of your Personal Data based on the legitimate interest of the controllers and the controllers will continue to process your data only if there are compelling legitimate grounds for the processing which override your interests, rights and or for the establishment, exercise or defense of legal claims. Your right to object to direct marketing purposes can be exercised at any time. Your objection to processing carried out through automated means is also valid for processing carried out with traditional means.

	Withdrawal of consent	if the processing of your Personal Data is based on consent, you have the right to withdraw your consent at any time.
	Data portability	where the processing is based on consent or on a contract and is carried out by automated means, you have the right to obtain in a structured format, commonly used and machine-readable format the Personal Data you provided us with and, where technically feasible, to have them transmitted to another data controller.

6. How to exercise your rights



To exercise your rights, and for any query or clarification on how your Personal Data are processed and used pursuant to this Notice, you can contact privacy@louispoulsen.com.



You may also at any time lodge a complaint with the Competent Data Protection Authority or bring an action before the competent national courts.

7. Changes to this Notice

This Notice is subject to periodic updates. To this end, we indicate the last update date at the beginning of this Notice, and we recommend to regularly consult this Notice. If you have already submitted your Personal Data, any change that substantially affects the processing of Personal Data, will be communicated to you through the appropriate channels to ensure that you are effectively aware of the way your data is processed, with a view to full transparency of the processing operations and full and adequate protection of your rights.

Louis Poulsen Companies

Louis Poulsen A/S

with registered office at Kuglegårdsvej 19-23, DK-1434, Copenhagen (Denmark) and its Affiliates:

- Luminous Designs Investment ApS, Kuglegårdsvej 19 - 1434 Copenhagen (Denmark)
 - Louis Poulsen Germany GmbH, Grünstraße 15, D-40212 Düsseldorf – c/o Mindspace Germany GmbH (Germany)
 - Louis Poulsen Sweden AB, Box 23013 S-104 35 Stockholm (Sweden)
 - Louis Poulsen Norway AS, Drammensveien 130, 0277 Oslo (Norway)
 - Louis Poulsen Finland Oy, Kyllikinportti 2 FIN-00240 Helsinki (Finland)
 - Louis Poulsen Japan Ltd., 3F/4F AXIS Bldg., 5-17-1 Roppongi, Minato-ku, Tokyo, 106-0032, Japan
 - Louis Poulsen Holland BV, J.A. van Seumerenlaan 7, 1Hg, 1422XS Uithoorn, Nederland (The Netherlands)
 - Louis Poulsen Switzerland AG, c/o Berater & Partner AG, Töpferstrasse 5 - CH-6004 Lucerne (Switzerland)
 - Louis Poulsen USA, Inc., 36 East 31st Street, Floor 4, New York NY 10016, USA
 - Louis Poulsen UK, Ltd., c/o Goodwill Limited, 20 Red Lion Street, WC1R 4PS, London (UK)
 - Louis Poulsen Asia Pte Ltd, 5 Purvis Street, #01-02, Singapore 188584 (Singapore)
 - Louis Poulsen Korea, LLC, 9th Floor, 428, Seolleung-ro, Gangnam-gu, Seoul, South Korea
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