

# Privacy Notice: Information about processing of personal data Rapid COVID-19 Antigen Test

(Version 1.1)

In agreement with Region Midtjylland, on behalf of the Danish Regions, Copenhagen Medical A/S provides and carries out COVID-19 antigen tests. This Privacy Notice informs you about how we collect and process your personal data, in accordance with the [GDPR](#) and the [Danish Data Protection Act](#).

## 1. DATA CONTROLLER IN RELATION TO THE PROCESSING

Copenhagen Medical A/S  
Sankt Annæ Plads 11  
DK-1250 København K, Denmark  
CVR: 29519226

You can contact us on [support@cphmed.com](mailto:support@cphmed.com) and +45 32 42 24 55.

## 2. THE DATA WE COLLECT

In order to carry out the test, we collect and process the following data:

Sensitive personal data	a)	Biological material
	b)	Test result (positive/negative)
Confidential data	c)	CPR number
Ordinary, non-sensitive personal data	d)	Name
	e)	Mobile number
	f)	Date and location of test
	g)	Test type

We collect the data directly from you, in connection with carrying out the test:

- a) Upon arrival, we scan your health insurance card ("Sygeskringsbevis"), in order to obtain information that can uniquely identify you: your name and your CPR number. If you do not have a sygeskringsbevis, we enter your name and CPR number manually.
- b) We also ask you to provide your mobile number.
- c) We collect biological material via your nose (nasopharynx), by using a long nasal swab.
- d) The test result, which shows whether you have COVID-19 or not (positive/negative).

## 3. THE PURPOSES AND THE LEGAL BASIS FOR PROCESSING OF YOUR PERSONAL DATA

The purposes for processing are:

- a) To carry out the test, in order to establish whether you have COVID-19 and to send you a text (SMS) with a link, for you to access your test result.
- b) To disclose a positive test result along with your name and CPR number to The Danish Patient Security Authority, to monitor the development of the pandemic and contact tracing.
- c) To disclose information that can uniquely identify you and that you have had a COVID-19 test carried out, to the regional councils, in order to obtain compensation for the execution.

The legal basis for our processing is §§ 1-2 and 4 in Executive Order 2020/1919 on private test providers' notification of positive COVID-19 test results for the purpose of contact tracing and compensation cf. The GDPR art. 9(2) (g), cf. art. 6 (1) (b, c and f) cf. The Danish Data Processing Act § 7, stk. 4.

#### 4. DISCLOSURE OF YOUR PERSONAL DATA

We disclose your personal data to the Danish Patient Security Authority and the Danish regions for the purposes listed in section 3.

We disclose your personal data to our data processors, who process the information on behalf of us and in accordance with our instructions. We use external parties for, e.g., operating a digital registration system as well as destruction of biological material.

The data processors may not use the information for any other purpose than fulfilling the agreement with us and are subject to confidentiality. We have entered into data processing agreements with all our data processors, who process personal data on our behalf.

We do not transfer your personal data to recipients outside the EU or the EEA.

#### 5. DATA RETENTION

Your personal data will be deleted when we no longer have a legitimate purpose to process your data. Generally, this will happen in accordance with the below time frames:

Biological material	The test is disposed of after 15 minutes and sent for secure destruction.
Mobile number	1 month.
Test type, date and location, test result, CPR number and name.	In accordance with the Record Keeping Order § 15 (Journalføringsbekendtgørelsen 2018/530), we are obliged to store journal entries for 10 years.

#### 6. YOUR RIGHTS

In accordance with the GDPR, you have a number of rights in relation to our processing of your personal data.

If you wish to make use of your rights, please contact us by using the information stated in section 1.

- You have the right to request and obtain access to the personal data that we process about you.
- You have the right to obtain correction of inaccurate personal data that we hold about you.
- Under certain circumstances, you have the right to obtain deletion of your personal data, prior to the expiry of our general retention periods.
- Under certain circumstances, you have the right to obtain restriction of our processing of your personal data. If you have the right to restricted processing, we may only process the data – with the exception of storage - with your consent or for the establishment, exercise or defence of legal claims or for the protection of another natural/legal person or for reasons of important public interests.
- Under certain circumstances, you have the right to object to our otherwise legal processing of your personal data.

You can read more about your rights in the Danish Data Protection Agency's ("Datatilsynet") guidelines on data subject rights, which you can find on [www.datatilsynet.dk](http://www.datatilsynet.dk).

You have the right to lodge a complaint with Datatilsynet, if you are dissatisfied with the way we process your personal data. You can find contact information to Datatilsynet on [www.datatilsynet.dk](http://www.datatilsynet.dk).