



“External” Privacy Policy for NSE Gruppen AS

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1. Description of the privacy policy

NSE Gruppen AS (hereinafter: NSE), including all its subsidiaries, is committed to protecting the privacy and security of the personal data of all individuals that we process in conducting our activities. This applies to both our own associates and to contact persons at our partners, customers and suppliers.

All our processing of personal data shall be subject to the applicable Norwegian privacy legislation. Processing of personal data means use of personal data, including collecting, storing, changing, compiling, distributing and deleting.

This privacy policy describes how the NSE group obtains, uses and shares personal data before, during and after your collaboration with us and how we do this in accordance with the Norwegian Personal Data Act and the General Data Protection Regulation (GDPR).

The privacy policy covers all individuals, including contact persons at other enterprises that are registered in our systems. However, this policy does not apply to our associates as these are informed about our processing in our own internal channels.

The privacy policy including appendices shall meet the requirements for legally-required information to be provided to data subjects. All data subjects shall have access to this information.

The information shall include the purpose for the processing, the categories of personal data, recipients of the personal data (if they are distributed), information about any distribution of personal data to other countries, how long the personal data will be stored, the right of data subjects to view, correct or request deletion of personal data, how the company gained access to the personal data and the opportunity to submit a complaint against the company to the Norwegian Data Protection Authority.

2. Responsibility for processing personal data in our organisation

NSE is responsible for personal data processed by the group including all its subsidiaries.

The Managing Director of NSE Gruppen AS has operational responsibility for processing, unless it is explicitly placed with one of the subsidiaries for particular types of personal data, based on that company solely determining the purpose and use of the data on an independent basis.

The data controller for your personal data is:

Helge Olsen, NSE Gruppen AS, Managing Director.

The contact information for Helge Olsen is:

Address: Finnestadsvingen 32, 4024 Stavanger, Norway

E-mail: helge.olsen@nsegruppen.no

Telephone: +47 480 34 805

Organisation no. 817 019 382

All data subjects may nevertheless contact our data protection officer directly: Stian Kleggetveit, stian.kleggetveit@nsegruppen.no , telephone +47 907 03 450.

3. Basis for processing personal data

3.1 Basic principles

NSE will otherwise make sure that personal data we process is handled in line with the basic principles laid down in the GDPR, and in that way we ensure that the personal data:

- 1) are processed in a manner that is legal, fair and transparent for the data subject
- 2) are collected for specific, explicitly stated and legitimate purposes and are not further processed in a manner that is incompatible with these purposes
- 3) are adequate, relevant and limited to what is necessary for the purposes for which they are being processed
- 4) are correct and, if necessary, updated
- 5) are stored in such a way that it is not possible to identify the data subjects for longer than is necessary for the purposes for which the personal data are being processed
- 6) processed in a manner that ensures adequate security for the personal data, including protection against unauthorised or illegal processing and against unintended loss, destruction or damage

If we contemplate using personal data for purposes other than those for which we have collected them – see Section 2 above – we shall always assess whether the new or altered purpose is compatible with the original one. We will also inform the data subject about the new compatible purpose.

3.2 Basis for processing personal data

The Norwegian Personal Data Act establishes various legal grounds that may individually allow the lawful processing of personal data. Any processing must meet one of these grounds in order for lawful processing to be carried out. The actual legal grounds that NSE will use are either:

- 1) the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- 2) the processing is necessary for the performance of a contract to which the data subject is a party, or in order to carry out measures at the request of the data subject prior to entering into an agreement
- 3) the processing is necessary in order to meet a legal obligation that rests with the data controller
- 4) the processing is necessary for purposes related to the legitimate interests that are being pursued by the data controller or a third party, unless the interests or the fundamental rights and freedoms of the data subject take precedence and require protection of personal data, especially if the data subject is a child (balancing of interests)

Our protocol will indicate the basis we have for processing the individual type or category of data. If the basis for processing is consent from the data subject (number 1), we shall obtain and document valid consent in line with the new regulations.

If processing is based on our legitimate interest (balancing of interests), we shall specifically document in writing the balancing that has been carried out. The balancing will follow the protocol (see Appendix F-11826).

4. Our processing of personal data

4.1 Introduction

NSE has surveyed all processing of personal data that takes place within the NSE Group. This is documented in a special processing protocol in which we list categories of data subjects, the purpose

for the processing, how we process the information and the grounds we have for the processing. The protocol is attached Appendix F-11826 to this privacy policy.

This protocol forms the basis for this privacy policy, our risk assessment and the internal control that has been established in this area. The survey will assist us in ensuring compliance with the rules on processing personal data for all processing that is carried out. The protocol is a dynamic document that will be continuously updated and supplemented as necessary.

It will also be indicated in the protocol what the normal storage period is for the various categories of personal data, i.e. when they are normally deleted by NSE at its own initiative. We normally delete personal data without undue delay when they no longer are “necessary” for the purpose for which they were collected or processed, provided we are not obliged to store them for a longer period or there is another legitimate interest in keeping them. We shall review our deletion procedures at least once a year. Our guidelines for deletion appear below or directly from the protocol (see Appendix F-11826).

4.2 Former employees

While the processing of most of the personal data regarding former associates is based on a balancing of interests, we are also legally obliged to keep certain information beyond the employment relationship or engagement period. All former associates have been given, and may receive upon enquiry to us, specific information regarding how NSE processes information about them.

4.3 Job applicants

We normally use an external supplier in the recruitment process. The external supplier obtains consent for processing personal data in connection with the recruiting process. NSE has entered into a data processor agreement with an external supplier.

We ask those who apply for a job with us to send us the least possible information directly and instead to use the web portal of the external supplier. However, any information we receive regarding names, education, work experience, references, etc. (CVs) will only be processed for the purpose and will be properly stored for as long as the information is needed. Job applicants will occasionally directly provide NSE with additional personal data they consider relevant for the assessment of the application, and sometimes we receive open applications directly. We also document interviews and the evaluations during the process in our systems.

To the extent information is processed directly by NSE, the processing of personal data regarding job applicants is based on a balancing of interests. We need to use information to evaluate applications job applicants send us, and that is also what the data subject expects us to do. Giving us information is voluntary. Such processing is a legitimate interest for both NSE and the data subject, and it will serve the purpose for obtaining the data. It is not possible to evaluate an application without processing personal data. Processing is therefore necessary and legitimate.

We do not use the information for any purpose other than evaluating the application. We do not give the information to anyone else. We believe that this legitimate interest takes precedence over the privacy interests of the job applicant.

We will normally keep information from job applicants for six months after recruiting is finished, in case job applicants should think that their rights have not been complied with. This can vary, and sometimes it is specially adjusted with the consent of a job applicant, possibly according to a specific legitimate need to extend the storing of the information. This may be the case, for example, if it is

necessary to postpone the recruitment process or it turns out during the process that a job applicant might be suited for an available position other than the one announced.

If we decide to hire the job applicant, we may ask for additional information and documentation for information we have already received. In that case, this will be obtained on the same basis as we process personal data regarding employees.

4.4 Home buyers

NSE will obtain, record and share personal data about home buyers associated with our projects. Such personal data will be shared with the estate agents used to sell the project properties.

Such processing is a legitimate interest for both NSE and the data subject, and it will serve the purpose for obtaining the data which is to complete a sale. This is not possible without processing personal data. Processing is therefore necessary and legitimate.

We do not use the information for anything else and do not give the information to anyone other than estate agents and in some cases government authorities. We believe that this legitimate interest takes precedence over the privacy interests of home buyers for this type of processing.

4.5 Supplier contact persons

The processing of personal data is based on a balancing of interests. We need to maintain contact with our suppliers in order to follow up on offers, orders and deliveries, for example. This is a legitimate interest. This contact can only be efficient if we contact individuals directly. Processing is therefore necessary. The processing is carried out by the supplier with whom we have entered into an agreement forwarding contact information for one or more individuals as the supplier's contact persons.

In addition to names, we process contact information such as telephone numbers, e-mail addresses and employer details, all of which are primarily related to the contact person's employment and not to his or her private life. The processing of the information is related to the supplier's business activity and thus not to the private life of the contact person. Our processing of the personal data is clearly foreseeable for the contact person. The scope of the information is extremely limited. We believe that this legitimate interest takes precedence over the contact person's interests.

We delete the information when we become aware that the contact person is no longer employed by the supplier or the supplier has designated a new contact person. The same applies when the supplier relationship has ceased. We may nevertheless store the information for a longer period if we believe we may need documentation of the contact we have had with the supplier. This may be the case, for example, for questions regarding rights or obligations in the contractual relationship with the supplier. Legislation may also impose requirements for a longer storage period.

4.6 Contact persons at corporate customers and their business partners

The processing of personal data is based on a balancing of interests. We need to maintain contact with our corporate customers and their business partners in order to follow up on offers, orders and deliveries. This is a legitimate interest. That contact will be efficient only by contacting individuals directly. Processing is therefore necessary. The processing is carried out by the customer with whom we have entered into an agreement forwarding contact information for one or more individuals as the customer's contact persons.

In addition to name, we process ordinary information such as telephone number, email address and name of employer, all of which are primarily related to the contact person's employment. The

processing of the information is related to the supplier's business activity and not to the private life of the contact person. The scope of the information is therefore limited. Our processing of the personal data is clearly foreseeable for the contact person. We believe that this legitimate interest takes precedence over the contact person's interests.

When consent is required under the Norwegian Marketing Control Act, the contact person will also have given consent before we send e-mails or other electronic communications with marketing content.

We shall delete the information when we become aware that the contact person is no longer employed by the customer, or when the customer has designated a new contact person. The same applies when the customer relationship has ceased. We may nevertheless store the information for a longer period if we believe we may need documentation of the contact we have had with the customer. This may involve, for example, questions regarding rights or obligations in the contractual relationship with the customer. Legislation may also impose requirements for a longer storage period.

4.7 Other contact persons in the public sector and other partners

The processing of personal data is based on a balancing of interests. We need to maintain contact with public authorities, such as the Norwegian Labour and Welfare Administration (NAV) and supervisory authorities, in connection with public law matters in which we may have rights and obligations under employment law. We also need contact with some partners, for example a company health service and employer organisations. This is regarded by NSE as a legitimate interest.

In a number of cases, this communication will only be effective if we can contact individuals directly. Processing is therefore necessary. We store names and contact details, and we use this information to contact the person's employer. The information is related to the business of the contact person's employer and not to the contact person's private life. Our processing of the personal data is clearly foreseeable for the contact person. We believe that this legitimate interest takes precedence over the contact person's interests.

We shall delete the information when we become aware that the person is no longer relevant to our needs, including if the person is no longer employed by our partner, a public agency, etc., or if we end the collaboration with the enterprise in question. We may nevertheless store the information for a longer period if we believe we may need documentation of the contact we have had with the person or the person's employer. This may involve, for example, questions regarding rights or obligations in the contractual relationship or regarding the contact person's employer.

5. Processing of sensitive personal data

NSE normally does not process sensitive personal data regarding anyone other than associates. To the extent we consider ourselves required to process personal data regarding other persons, we will inform the individual about this and will normally ask for consent.

6. Who we share personal data with and who has access

Our suppliers of IT services will have access to all the personal data for which we are the data controller if personal data are stored on our systems that are operated by the supplier or otherwise become available to the supplier pursuant to the contract with us.

In addition, our supplier of recruitment tools, for example, will have access to all information about our job applicants. Other suppliers, customers and partners may also have access to specific types or

categories of personal data for which we are the data controller. Which information this involves will be indicated in the protocol (see Appendix F-11826).

When they have access to personal data in such cases, suppliers, customers and partners act according to data processor agreements and under our instructions, and may only use personal data for the purposes we have determined and which are described in this privacy policy. Their employees who gain knowledge of personal data through their work shall be subject to a duty of confidentiality. All information entrusted to them by us shall be handled confidentially.

NSE does not disclose personal data in other instances or in ways other than those described in this privacy policy, unless the data subject explicitly requests or consents to this or the disclosure is legally required.

7. Rights of data subjects

We will respond to enquiries from data subjects without undue delay. We shall ensure that the data subject is accorded his or her due rights by our organisation.

A data subject has various rights with respect to personal data we process. The exact rights in question will depend on the circumstances.

Revoke consent:

- if you have given consent to our processing of personal data, you may revoke your consent at any time with reference to this processing by directing an enquiry to us regarding this.

Ask to see:

- You are entitled to see which personal data we have recorded about you, so long as the confidentiality duty is not a bar to this. To ensure that personal data are disclosed to the right person, we may require that a request to view data be made in writing or that the requester's identity be verified in another way.

Request correction or deletion:

- You may ask us to correct erroneous information we have about you or ask us to delete personal data. We will do our utmost to accommodate a request to delete personal data, but we cannot do this if there are compelling reasons not to delete the data, for example, because we must store the information for documentation purposes.

Data portability:

- In some cases you may be able to have personal data disclosed which you have furnished to us in order to have it transferred to others. If it is technically possible, there will be an opportunity in some cases to have the information transferred directly to the other enterprise.

Appeal to the supervisory authority:

- If you disagree with the way we process your personal data, you may submit an appeal to the Norwegian Data Protection Authority.

8. IT security

As the Norwegian Personal Data Act requires, we have taken suitable technical and organisational measures to achieve an IT security level that corresponds to the risk we believe is related to our processing of personal data.