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## Norsk Privacy Policy

Suitable for external audience

The Norsk Privacy Policy describes how we comply with the General Data Protections Regulation (GDPR) (Regulation(EU)2016/679) which is the new European Parliament legislation that replaces the data protection directive (officially Directive 95/46/EC) of 1995 on 25 May 2018.

The Norsk Privacy Policy meets the requirements of GDPR ensuring the protection of data control, processing, storage and its transmission for both employees and customers ensuring compliance with EU data protection legislation.

### **Our responsibility under the GDPR**

Norsk is obliged to ensure your personal data is protected.

### **Definition of Personal Data**

“Any information related to a natural person or ‘Data Subject’ that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address.”

### **Data Control and Processing**

The GDPR applies to “controllers” and processors. Article 4 of the GDPR define the terms “controller and processor” as follows:

“A controller is the entity that determines the purposes, conditions and means of the processing of personal data, while the processor is an entity which processes personal data on behalf of the controller.”

Norsk will comply with the following GDPR Principles:

- Personal data shall only be processed in the event that a lawful basis to do so exists. This lawful basis may be derived from a legal obligation, a contract or your previous express consent, insofar as the processing of your personal data is required
- You will be informed of the lawful basis of the data processing in question and of the controller responsible for these activities, insofar as no special exceptions exist with reference to the duty to inform, for example you have already been informed via another channel or the data is already publically accessible
- We will provide transparency about how we intend use the data, giving individuals appropriate privacy notices when collecting their personal data
- Personal data shall not be processed beyond the initial purpose



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- The personal data held shall only be sufficient for the person we are holding it for and in relation to that individual and purpose
- Personal data shall be accurate and where necessary, kept up to date
- Personal data shall be kept for no longer than is necessary to comply with legal, financial and contractual reasons, thereafter deletion will occur
- Personal data shall be processed in accordance with the rights of data under GDPR

**As Processor Norsk shall:**

- only act on the written instructions of the controller (unless required by law to act without such instructions);
- ensure that people processing the data are subject to a duty of confidence;
- take appropriate measures to ensure the security of processing;
- only engage a sub-processor with the prior consent of the data controller and a written contract;
- assist the data controller in providing subject access and allowing data subjects to exercise their rights under the GDPR;
- assist the data controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
- delete or return all personal data to the controller as requested at the end of the contract
- submit to audits and inspections, provide the controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.
- co-operate with supervisory authorities such as the ICO (Article 31);
- keep records of its processing activities in accordance with Article 30.2;

**Your individual (data subject) rights under GDPR**

- to be informed of specific information about the processing of your data
- to access their personal data and supplementary information (free of charge)
- to rectification of personal data if incomplete or inaccurate
- to erase through deletion or personal data where no compelling reason for it to continue to being processed exist
- to restrict processing (restricted but permitted to store)
- to data portability
- to object
- to automated decision making and profiling



**What else do we need to tell you?**

If you have reasons to believe your data has not been used for the initial purpose or transmitted in in direct conflict of the principles in Norsk Privacy policy outside of the EU:

- To submit a complaint directly to Norsk
- Submit a complaint to Information Commissioner's Office (ICO)