

# Privacy policy

Your privacy is important to Nextron AS. In this privacy policy we will explain which personal data we collect and process, for which purposes we process your data and provide information about your rights.

## 1 WHAT IS PERSONAL DATA?

Personal data is any information that can be directly or indirectly linked to a natural person, such as name, postal address, e-mail address, IP address and mobile number.

## 2 WHO DO WE PROCESS PERSONAL DATA ABOUT?

This privacy policy covers the processing of personal data concerning the following groups of people:

- Those that visit our website
- Our customers main contact person
- Applicants for vacant positions
- Other individuals that we interact with

## 3 WHO IS RESPONSIBLE?

Nextron AS, Gunnar Schjeldrups vei 9, 0485 Oslo, is the responsible data controller for the processing of personal data, for the purposes set out in this privacy policy. We must process your personal data in accordance with our obligations under current privacy legislation, including the EU's General Data Protection Regulation ("GDPR").

## 4 WHAT PERSONAL DATA DO WE PROCESS?

The categories of personal data which we collect and process are as follows:

- Basic information such as name and contact details.
- Demographic information, such as date of birth and gender.
- Information about your customer relationship, such as service and order information, payment information and inquiries to customer service.
- Information regarding your visit on our websites (including date and time, what type of PC/mobile phone, operating system and the browser you use, IP addresses, screen size etc.)
- Information shared by candidates who apply for a job with us, including information provided in the CV and application.
- Any other information collected on the basis of your consent. In that case, you will receive specific information about what information we collect and what it is used for when we ask for your consent.

## 5 HOW DO WE COLLECT YOUR PERSONAL DATA?

We can collect your personal data in various ways:

- We receive personal data directly from you when you order our services or otherwise contact us about inquiries/offers, or for recruitment purposes when you apply for a job with us. This information is necessary for us to be able to deliver the service you have ordered, or to follow up on your inquiries or job application.
- We receive personal data indirectly from you when you use our services, for example our websites. This information is important in order to be able to improve and further develop the services we offer you.
- We receive personal data from third parties when you come into contact with our partners via distribution channels that are connected to our distribution channels, or if your information is available in public registers. This information is important for us to be able to improve and adapt the services we offer you.

It is voluntary to share your personal data with us. However, certain information may be necessary to be able to carry out any agreement that you have entered into with us, including, among other things, information that is used in connection with invoicing.

## 6 WHAT IS OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA?

According to the current privacy legislation, we must have a legal basis for our processing of personal data. Our processing is based on one or more of the following bases:

- You have given your consent to the processing of your personal data for one or more specific purposes (GDPR Article 6(1)(a)).
- The processing is necessary for the performance of a contract with you (GDPR Article 6 (1)(b)).
- The processing is necessary for compliance with a legal obligation to which we are subject, including, for example, storing information in accordance with accounting legislation (GDPR Article 6 (1)(c)).
- The processing is necessary for the purposes of the legitimate interests pursued by the us, except where our interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (GDPR Article 6 (1)(f)).

If our processing of personal data is based on your consent, you have the right to withdraw your consent at any time.

You can read more about the purposes for which we process personal data and the legal grounds that give us the right to process data for the different purposes under point 7.

## 7 FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

We collect and use your personal data for various purposes, depending on your connection to us and how we came in contact with you.

You can read more about what personal data we process, what we use it for (the purpose) and why we are allowed to do so (the legal basis for processing data).

Nexton AS processes personal data for the following purposes:

- **Deliver our products and services:** We process personal data to provide and deliver our products and services to you, in this context, to conclude contracts and manage our customer relationships. For example, your information is processed in connection with e-mail correspondence, order placements and deliveries. In this context, we process the following categories of personal data: basic information related to employees of our customers, such as names and contact information, as well as other information that may be shared with us. The legal basis for processing personal data regarding the administration of our customer relationships is GDPR Article 6 (1)(b).
- **Development and analysis:** We process personal data to understand the needs of our customers and to improve and further develop our products and services. In this context, we process the following categories of personal data: demographic information, service and order information, customer service inquiries, information about your visit to our websites (metadata). The legal basis for the processing of the above-mentioned data is GDPR Article 6 (1)(a-f), and possibly GDPR Article 9 (2)(a-j) if sensitive information is being processed.
- **Sales and marketing:** We use both anonymised data and personal data for marketing purposes in accordance with current legislation. These activities include the marketing of products and services, including to create target groups, adapt the marketing to your needs and to send out newsletters and other information you have requested. We may also use your personal data to communicate with you, including to follow up on your inquiries. In this context, we process the following categories of personal data: basic information relating to employees of our customers and potential customers, such as names and contact details, as well as other information that you may share with us. The legal basis for the processing of the above-mentioned data is based on GDPR Article 6 (1)(f) – our legitimate interest.
- **Job advertisement and employment:** We use personal data to assess candidates who apply for positions with us, either unsolicited or through an advertisement. In this context, we process the following categories of personal data: the personal data provided in the CV and application, as well as other information that the candidate may share with us. The legal basis for the processing of the above-mentioned data is GDPR Article 6 (1)(f) – our legitimate interest.
- **Information security and misuse of services:** We will be able to process personal and traffic data to ensure good security in all our services. We will also be able to process personal data to detect or prevent various types of fraud and abuse. In this context, we process the following categories of personal data: log data, IP addresses, metadata, etc., and other information that you may share with us. The legal basis for the processing of the above-mentioned data is GDPR Article 6 (1)(f) – our legitimate interest.
- **Compliance with statutory requirements:** We process personal data to fulfill our statutory duties, for example in connection with accounting and to provide information

to the competent authority when this is required of us in accordance with applicable legislation. The categories of personal data processed depends on legal requirements. The legal basis for the processing is GDPR Article 6 (1)(c).

## **8 HOW DO WE KEEP YOUR PERSONAL DATA SAFE AND SECURE?**

We have established routines and measures to ensure that unauthorized persons do not gain access to your personal information and that all processing of the information otherwise takes place in line with current legislation. The measures include, among other things, regular risk assessments, technical systems and physical procedures to ensure information security and procedures to verify access and rectification requests.

## **9 WHO DO WE DISCLOSE PERSONAL DATA TO?**

We share the personal information with other companies in our group: Nextron Aps (Denmark), Nextron Filial Sweden and Nextron Finland, for use for the same purposes for which the information was collected.

We may also share the information with our technical subcontractors or other companies that perform tasks on our behalf. Any company that processes your personal data on our behalf is called a data processor. If we engage a data processor, we enter into a data processor agreement that regulates how the data processor can process the information they gain access to and their duties in that regard, including for what purposes the personal data can be used.

We will also be able to share personal data with public authorities where there is a statutory disclosure obligation.

## **10 DO WE TRANSFER PERSONAL DATA TO OTHER COUNTRIES?**

We do not transfer your personal data to countries and/or organizations outside the EU/EEA area that do not offer adequate protection (so-called third countries). If your personal data is transferred to such third countries, prior to the transfer, we will ensure that it takes place in line with the requirements set out in GDPR chapter V, including, for example, by us entering into an agreement with the recipient of the data based on the EU's standard contractual clauses.

## **11 HOW LONG DO WE STORE PERSONAL DATA?**

We store your personal data for as long as is necessary for the fulfillment of the above-mentioned purposes for the processing of the data. However, this does not apply if storage is required by law for a longer period than the purpose dictates.

This means, for example, that personal data we process on the basis of your consent, is deleted when consent is withdrawn. If the basis for the processing is our legitimate interest, the information will be deleted when such legitimate interest no longer exists. When assessing the storage time where the legal basis is our legitimate interest, we place particular emphasis on the nature of your relationship with us. Normally, personal data is deleted as soon as a recruitment process or a customer relationship ends.

Information stored in accordance with statutory obligations is deleted when the obligation ceases. The accounting legislation requires us to store certain accounting documents for a specified period of time, often for 3,5 years or 5 years.

## **12 YOUR RIGHTS**

The privacy legislation gives you a number of rights, including the right to access, rectify and erase the personal data we have stored about.

We strive to ensure that the personal data we have stored about you is correct and up-to-date. If you discover that the information we have stored about you is incorrect, we encourage you to contact us. This also applies if you want the stored data to be deleted.

Regarding the right to erasure, there is an exception for information which is necessary in order to be able to deliver a service that you would like to use, or it is required by law to store the information for a specific period.

You also have the right to data portability. This means that, among other things, you have the opportunity to extract your personal data in a machine-readable format.

Furthermore, you have the right to object to the processing of personal data and the right to object to personal profiling and automated decisions. This means that you can demand that your personal data is not analyzed to reveal your behaviour, preferences, abilities or needs. However, this does not apply if the processing is necessary to fulfill an agreement you have entered into with us or if you have previously expressly consented to the processing.

You also have the right to receive a copy of the personal data we have registered about you, as long as an obligation of confidentiality does not prevent this. In order to ensure that personal data is handed over to the right person, we may require that access requests are submitted in written form and that identity is verified.

In some situations, you can also ask us to limit the processing of your personal data.

If you believe Nextron AS does not comply with this privacy policy or the applicable legislation, you can send us a complaint. You can also complain to the Norwegian Data Protection Authority ("Datatilsynet").

You can read more about your rights on the Norwegian Data Protection Authority's website: [www.datatilsynet.no](http://www.datatilsynet.no).

## **13 HOW DO WE USE COOKIES?**

We use cookies and similar technologies on our websites. You can reject storing of cookies by changing the settings in your browser. However, this may cause issues with accessibility on the website. You can read more about how we use cookies [here](#).

## **14 HOW DO WE NOTIFY YOU IF CHANGES ARE MADE TO THIS PRIVACY POLICY?**

Our services are in continuous development. We may therefore need to update our privacy policy. If the privacy policy is subject to updating, the updated privacy policy will be made available on our website: [www.nextron.no](http://www.nextron.no)

## **15 HOW TO GET IN TOUCH WITH US**

If you have questions regarding how we process your personal data or wish to exercise your rights, you can contact us by sending an email to [nextron@nextron.no](mailto:nextron@nextron.no)