

NORDISK PRIVACY POLICY

Your privacy is important to Nordisk Skibsrederforening ("**Nordisk**"). It is important to us that you know how we process your personal data. In this privacy policy, we inter alia describe:

- the categories of personal data that we process;
- how we process personal data; and
- what purposes we process personal data for.

WHAT IS PERSONAL DATA?

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

WHO IS THE DATA CONTROLLER?

On behalf of Nordisk, Steinar Thore Nyrud, Managing Director, is the data controller in relation to the personal data that Nordisk processes for the purposes described below. We have an obligation to ensure that your personal data is processed in a secure and legal manner in accordance with EU Regulation 2016/679 (GDPR) and national data protection laws.

HOW DO WE COLLECT PERSONAL DATA?

As a Mutual Defence Club Nordisk receives personal data in many ways as we service our members. Nordisk may collect personal data in the following ways:

- in relation to the handling of our relationship with our clients and employees or persons who contact or visit us;
- when you use our services, inter alia browse our web sites or use our online services; or
- from public registers, and our own historical information and other sources.

CATEGORIES OF DATA SUBJECTS

We may process personal data linked to the following categories of data subjects:

- **Client representatives:** natural persons who are representatives of our clients (i.e. contact persons) (also called "clients" or "members" in this policy).
- **Counterparties and third parties:** natural persons who represents counterparties or other third parties we are in contact when providing our services.
- **Agents:** natural persons who are our representatives (i.e. contact persons, very often another law firm)
- **Public authorities and supplier representatives:** natural persons who are representatives of our suppliers or public authorities (i.e. contact persons)
- **Other data subjects:** any other natural person (i.e. persons who visit our websites or otherwise get in contact with us).

WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

The categories of personal data that we process may vary depending on the data subject.

The personal data we may process about the client representatives may be categorised as follows:

- **Personal details**, including title, name, e-mail address, address and telephone number and other personal data linked to the Client relationship.
- **Contract details**: details relating to the contract between our clients and received from our clients as part of the membership/client relationship with Nordisk,

The personal data we may process about clients and other third parties may be categorised as follows:

- **Personal details**, including name, address, postal code, city/town, date of birth, gender, e-mail address, telephone number, etc.
- **National ID number**, such as social security number, passport number, unique identifier or other, issued by a public body.
- **Contract details**: details relating to the contract between our clients and third parties (received from our clients and the third party).
- **Financial information**: means (a) information obtained from external sources (i.e. public databases, credit rating providers, etc.) related to clients or third parties, which is processed in relation to legal services and (b) any information relating to the payment details arising from assignments.
- **Confidential information**: obtained from clients or thirds parties in relation to our case processing, i.e. specific information that are considered to be confidential of nature (but not necessarily sensitive data), such as technical or other professional information, or individual or family circumstances, work situation, etc.
- **IP Addresses and other technical information.**

The personal data we may process about the agents may be categorised as follows:

- **Personal details**, including title, name, e-mail address, telephone number, and home address. CV showing professional expertise and background.

The personal data we may process about the Public Authorities and Supplier representatives may be categorised as follows:

- **Personal details**, including name, e-mail address, telephone number.

We may also process other categories of data than those listed below if the relevant data subject has consented to processing of such data. In this case, the data subject will, before giving consent, receive specific information on the data that we collect as well as the purposes of the processing of said data.

The processing of anonymous data, i.e. data that cannot be linked directly or indirectly to a natural person, is not subject to the restrictions described in this policy.

FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

Nordisk may process personal data for the following purposes:

- **Legal services.** In order to deliver our legal services, we process personal data for various purposes, including general counselling and dispute resolutions, as well as administrative purposes such as performing conflict checks, case processing and billing.
- **Compliance with legal requirements for law firms.** We must observe and comply with several laws in relation to our legal services, including i.e. money laundering requirements.
- **Security.** In order to secure our network and information we must prevent circumstances, events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data.
- **Business analysis.** We process personal data to better improve and further develop our legal services.
- **Sales and marketing.** We use and process both anonymous and personal data for marketing purposes to existing and prospective customers under the prevailing legislation. These activities include marketing of our services, sending of newsletters and other information that you may have requested.
- **Other purposes on the basis of your consent.** We may process your personal data for other purposes if you have given your consent to the specific processing.

THE LEGAL BASIS FOR OUR PROCESSING OF YOUR PERSONAL DATA

According to the GDPR, Nordisk must base its processing of personal data on a legal basis. Our processing of personal data will be based on one or more of the following:

- The processing of personal data is necessary for the **performance of a contract** which you are party to or in order to take steps at your request prior to entering into a contract.
- The processing of personal data is necessary for **compliance with a legal obligation**, inter alia our obligation to keep information in accordance with the prevailing accounting legislation.
- The processing is necessary for the performance of a task carried out in **the public interest** or in the exercise of official authority.
- The processing is necessary for the purposes of our **legitimate interest**, insofar as this interest is not overridden by your interests or fundamental rights and freedoms which require protection of personal data.
- You have given **consent** to the processing for one or more specific purposes.

WHO MAY WE TRANSFER PERSONAL DATA TO?

We may transfer your personal data within the Nordisk group companies. This includes transfer of data to one or more of the Nordisk entities located in Norway and Singapore or Nordisk's sister club Northern Shipowners Defense Club, Bermuda

We may share personal data with our agents, lawyers, suppliers and/or external advisors or consultants whom we have engaged to perform services or assist us in legal matters or other business processes. In certain instances, we will transfer personal data to the suppliers or give our suppliers access to our systems containing personal data. Supplier that processes data on our behalf, do so on the basis of a Data Processing Agreement that regulate the responsibilities of the data processor in connection with the processing of the relevant data.

If we are to pursue or defend a legal action in connection with our services in foreign countries, we may transfer personal data to legal advisors/lawyers/ and the courts and arbitration tribunals.

We may also share personal data with the authorities in cases where we are statutory obligated to do so, this may include regulators, law enforcement authorities, welfare authorities and fraud prevention authorities.

DO WE TRANSFER YOUR PERSONAL DATA TO COUNTRIES OUTSIDE THE EU/EEA AREA?

We do not transfer your personal data to countries outside the EEA unless it is necessary to perform our legal services in a country outside the EEA or if we use a supplier that processes data outside the EEA or to our subsidiary in Singapore. In the event that we transfer personal data outside the EEA, we will ensure that adequate safeguard are implemented in accordance with the GDPR.

HOW LONG DO WE STORE YOUR PERSONAL DATA?

We store your personal data for a period necessary to be able to fulfil the purposes of the processing described above. This does not apply, however, if storage of data for a longer period is required by law or other statutory regulations. We will also store anonymized or pseudonymised data for longer periods.

HOW DO WE KEEP YOUR PERSONAL DATA SAFE?

We are obliged to implement appropriate technical and organisational measures to ensure and to be able to demonstrate that our processing is performed in accordance with the GDPR and other relevant data protection legislation.

We have implemented a number of appropriate measures in order to ensure that unauthorized persons do not gain access to your personal data. Such measures inter alia include password protection, firewall protection and regular IT security reviews and updates of our various IT systems.

WHAT ARE YOUR RIGHTS?

The GDPR provides you a number of rights, including the right to basic information, the right of access to data, the right of rectification of data and the right to erase data that we have stored.

We will do our utmost to make sure that your personal data is correct and up to date. If you notice that your personal data is not correct, or you want to delete data, we encourage you to contact us.

We may however not be able to delete data which is necessary for us to fulfill our contract with a client, comply with legal obligations or where we have a legitimate interest to keep personal data.

Where the processing of the personal data is based on consent or a contract and the processing is carried out by automated means, you may have the right of so called data portability. This means that you shall have the right to receive the data that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance.

Furthermore, you will have the right to oppose or restrict the processing of your personal data, herein processing related to profiling and automated decisions. This means that you may require that your personal data is not analyzed to reveal your behavior, preferences, capabilities or needs. However, this does not apply if the processing of your data is necessary to fulfil a contract which you are a party to or if you have consented to the processing.

If personal data is being processed on the basis of your consent, you may also have the right to withdraw your consent.

If you are of the opinion that Nordisk does not comply with the prevailing data protection legislation or other relevant legislation, you may send a complaint to Nordisk. You also have the right to file a complaint to the Norwegian Data Inspectorate. However, we encourage that you contact us first, so that we may come to a mutual understanding.

USE OF COOKIES

We use so called cookies on our websites. A cookie is a small text file sent to your browser and placed on your computer, tablet or mobile device when you visit a website. It can be used to remember information about your visit and may for example be used to track your preferences. Please read more about our use of cookies in our cookie policy [here](#).

USE OF THIRD PARTY WEBSITES

We may link to third party websites via our website. By clicking on one of these links, you will be referred directly to a website that is not controlled by us. Please observe that we are not responsible for third party websites and that our cookie policy and this privacy policy does not apply when using these websites.

AMENDMENTS TO THIS PRIVACY POLICY

We are constantly developing our services. We may therefore from time to time need to update our privacy policy. All amendments to this privacy policy will be made available on our web site, <https://nordisk.no/>

HOW DO YOU CONTACT US?

If you want to access, delete or correct any personal data that we have stored about you, or if you have any questions relating to how we process your personal data, please contact Ingunn Berg at iberg@nordisk.no.