

# NORDISK PRIVACY POLICY

Your privacy is important to Nordisk Skisrederforening ("Nordisk"). 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?

The data controller is Nordisk Skisrederforening, represented by the CEO, 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 collects personal data in the following ways:

- in relation to the handling of our relationship with our clients, partners and employees or persons who contact or visit us; or
- when you use our services, inter alia browse our websites or use our online services.

## 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 with 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 purpose for processing and the processing situation.

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

- **Personal details**, including name, e-mail address, telephonenumber.

In addition to the above, we will as part of our obligations under the Norwegian Anti-Money Laundering Act process personal data pertaining to personal circumstances in order to comply with legal obligations in terms of risk assessments, sanctions screening and other anti-money laundering requirements. The data processed for this purpose will vary from case to case as well as on the risk level involved in the specific case. However, all anti-money laundering processing of personal data will at least include checking of international sanctions lists, verification of PEP (politically exposed person) status, ultimate beneficial ownership and identification information. In high risk scenarios, it may also include adverse media information as well as information about criminal offences, as well as other information deemed necessary and relevant in order for us to

comply with the legal obligations of the Anti-Money Laundering Act.

We may also process other categories of data than those listed above, however the above categories of personal data are those normally comprised by our data processing. The personal data is collected directly from the data subjects themselves, from our clients, counterparties and agents, and from public authorities where relevant.

## **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. This processing is based on the fulfilment of contracts or compliance with a legal obligation.
- **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, book-keeping regulations and tax reporting. This processing is necessary to comply with a legal obligation.
- **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. This processing is based on our legitimate interest in protecting confidential information, as well as compliance with legal obligations.
- **Business analysis.** We process personal data to better improve and further develop our legal services. This processing is based on our legitimate interest in business development.
- **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. This processing is based on our legitimate interest in communicating with our clients and potential clients, and marketing our services to existing and potential clients.

## **WHO MAY WE TRANSFER PERSONAL DATA TO?**

We 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 Defence Club, Bermuda.

Furthermore, we 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 will transfer personal data to legal advisors/lawyers/ and the courts and arbitration tribunals. We will 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. Data kept for book-keeping, tax reporting and anti-money-laundering purposes are stored as long as required by applicable laws and regulations. The longest applicable retention period is ten years. Case data pertaining to litigation matters or potential litigation matters will be retained for a period of 20 years.

## **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?**

As a data subject, you are afforded several rights and freedoms under applicable data protection laws and regulations. To exercise such rights, please contact us via the contact details provided below. In order to ensure that we do not share personal data with unauthorized third parties, we will request that you confirm your identity before we respond to your request. Provided that we have confirmed your identity, we will respond as soon as possible and normally within 30 days. If we are not able to respond within 30 days, we will notify you of the delay and the reason for it in due course and prior to the 30-day deadline.

Within the limitations set out in applicable law, you have the following privacy rights:

- Right to information: you have the right to obtain further information about our use of your personal data.
- Right of access: You may request access to a copy of the personal data we process about you. Please note that there are some exceptions to this right, for example if the access infringes on the rights of others (for example it reveals personal information about a third party) or if it pertains to business secrets. If we make any exceptions to your right of access, we will inform you of this specifically.
- Right to rectification: It is important for us to ensure that we only process personal data which is correct and up to date. If you see that any of the personal data we process is incorrect, then you have the right to demand rectification.
- Right to data portability: You may obtain an electronic copy of the personal data you have provided to us in a digital format either directly to you or to a third party designated by you.

- Right to be forgotten: We only store personal data for the time needed to fulfil the purposes it was collected for. If you are of the opinion that we are storing information that should have been deleted, you may request that we delete such personal data. Please be advised however, that legal obligations such as tax reporting and book-keeping may result in us being obligated to not delete the personal data until the statutory retention period has expired.
- Right to objection: You may object to our processing of your personal data if your particular situation so requires. You may always opt-out of newsletters from us by pressing the "Unsubscribe" link at the bottom of the newsletters you receive from us.
- Right to restriction of processing: You have the right to request that we restrict the processing of your personal data for example if you are of the view that we are processing your data illegally or if you do not want us to delete data that are due for deletion.

Nordisk does not process personal data based on fully automated means which may lead to a legal or otherwise significant effect for the data subject. 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 Protection Authority. 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 [compliance@nordisk.no](mailto:compliance@nordisk.no).