Visolit AS ("Visolit", "we", "us") takes your right to privacy seriously. As data controller, we are responsible for the processing of your personal data in accordance with the applicable law.

The aim of this Policy is to provide our employees, consultants and other personnel ("employees") with information on our use and protection of their Personal Data, and on the employees' data protection rights. Personal data means information relating to an identified or identifiable individual.

# PERSONAL DATA WE PROCESS

**Information provided by you.** When you apply for a position and/or is employed/engaged by us, you will typically provide us with the following information:

*Contact information*, such as home address, email address and phone number.

*Identity information,* such as name, age, gender, nationality, date of birth, photograph, and information regarding residence permits and work permits, and languages.

*Social security number*.

*Information on family*, such as marital status, children and contact information on next of kin.

*Information on work experience and education*, typically information you provide when submitting your CV, application, education certificates and results and during interviews.

*Interests*, typically information that you provide when submitting your CV, application and during interviews.

*Information on payment of salary,* such as name of bank, bank account number and other information necessary to execute payments.

*Communication,* such as when you contact us with requests or otherwise have a dialogue with us.

*Health information*, such as information regarding physical and mental issues, disabilities, absence due to sickness, medical certificates, information on personal injuries and accidents in the workplace, allergies and dietary preferences.

*Membership in organisations,* such as union membership.

**Information collected about you.** When you apply for a position and is employed/engaged by us, we will typically collect the following information:

*Information regarding your employment,* such asemployment action (hire/rehire/termination), termination details, employment status, position, type of contract, term and related contract information, employment reference, employee IDs, photographs, full time/part time status, information relating to department, region, market, project and project allocation, travel details, employee expenses, work schedule and time worked, leave of absence information (vacation, holidays, accident and sick leave, maternity, paternity and parental leave etc.) and information relating to pensions. This information is collected from our systems, national state records, from you and from other Visolit employees (such as your leaders and colleagues).

*Information related to work and talent development*, such as evaluations, performance rating history, skills, memos from appraisal meetings, carrier development etc. This information is created through our systems, dialogue with you or with other Visolit employees (such as your leaders and colleagues).

*Information regarding warnings, whistle blowing and internal audit,* such as when you receive a warning, or you file a complaint or act as a whistle-blower or when Visolit performs compliance controls. This information is provided by either you, other employees or our customers.

*Background information*, such as information about you that we collect from publicly available sources, from references or from third parties that conduct background checks on our behalf.

*Information regarding salary and benefits*, including tax information, information on previous and current salary, overview of benefits, information regarding bonus, incentive plans, expenses, pensions, insurances, company cards etc. This information is provided by you, our salary system and by the national tax authorities.

*Information relating to social security benefits*, information relating to public benefits and benefits provided by Visolit, e.g. in the event of disabilities, invalidity, maternity/paternity leave and other leaves of absence. Such information is provided by you and public social security authorities.

*Voice recordings*, i.e. recordings of phone conversations between customers and employees at the customer centre.

*Technical information*, such as type of pc/phone/unit used by you and/or loaned by you from Visolit, user-ID, system access etc.

*Entrance card logs*, i.e. information on your use of entrance cards, including time stamps and what entrance was used.

*Camera surveillance recordings*, i.e. video surveillance of Visolits locations.

*Activity logs, i.e. logs of activity on our systems and networks.*

*Electronic communication*, such as information on use of email accounts, direct messages and other types of electronic communication.

# HOW THE INFORMATION IS USED

These are the most important purposes for which we use the information:

1. **To verify your identity and background**. For this purpose, we use identity information, contact information, background information, social security number and entrance card logs. Your social security number is only used when it is necessary to achieve secure identification.
2. **To administrate the employment**. For this purpose, we use identity information, information on family, communication, technical information, membership in organisations, information regarding your employment, information regarding warnings, whistle blowing and complaints, and health information.
3. **To administrate career development.** For this purpose, we use information regarding your employment and information related to work and talent development.
4. **To handle internal investigations related to warnings, internal audit or compliance controls.** For this purpose, we use information regarding warnings, whistle blowing and complaints and electronic communication.
5. **To execute salary payments and handle benefits**. For this purpose, we use information on payment of salary, information regarding salary and benefits, information relating to social security benefits and information regarding your employment.
6. **To administrate pensions and insurance.** For this purpose, we use information on payment of salary, information regarding salary and benefits, identity information, information on family, information relating to social security benefits, social security number and information regarding your employment.
7. **For bookkeeping purposes**. For this purpose, we use information on payment of salary, information regarding salary and benefits and information relating to social security benefits.
8. **In relation to our business operations.** We may use identity information and information regarding your employment in connection with offers/tenders, campaigns, cooperation projects and mergers and acquisitions.
9. **To arrange for employee work situation and HMS.** For these purposes we use health information, information regarding your employment.
10. **For training purposes.** We use sound recordings for the purpose of employee training.
11. **Promotion and marketing of the company, e.g. in connection with sales leads and bidding processes.** For this purpose, we use identity information and information on work experience and education.
12. **For social or work-related events.** We use contact information to invite you to arrangements arranged by Visolit.
13. **To secure Visolit’s premises and network.** For this purpose, we use technical information, camera surveillance recordings, entrance card logs, activity logs and electronic communication.

The legal basis for the processing of purpose **1, 2, 3**, **4**, **5,** **6** and **9** is that this is necessary in order to perform and administrate our employment agreement with you, and to perform our legal obligations as employers pursuant to

e.g. the Working Environment Act and the Act relating to Holidays. Health information and other special categories of personal data is only processed to the extent this is necessary to fulfil our obligations and rights in the area of employment law.

The legal basis for purpose **7** is to perform our legal obligations pursuant to the Bookkeeping Act.

The legal basis for purpose **8, 11** and **12** is our legitimate interest in promoting and improving our business and inviting you to business-related events. We will not use your pictures in connection with promoting Visolit, without your consent.

The legal basis for purpose **10** is our legitimate interest in training our employees.

The legal basis for purpose **13** is our legitimate interest in ensuring the safety of our employees at the work premises and to ensure the safety of our network.

We may also process your personal data for other purposes that are compatible with the purposes mentioned above, including in connection with mergers and acquisitions and claims and litigation.

# WHO WE SHARE THE INFORMATION WITH

We share information with our suppliers to the extent this is necessary to administrate our business operations and the workplace. We also share information with other companies in our group to the extent this is necessary for internal administrative purposes.

We share your information with the tax authorities and other public authorities to the extent this is necessary according to comply with our legal obligations.

We transfer your information outside the European Economic Area, as some of our suppliers and affiliates are located there. We ensure that your information is secured, either by entering into an agreement with the recipient, or by ensuring that the recipient is subject to certification schemes approved in the EU. We will provide you with further details upon request.

# HOW LONG WE STORE YOUR INFORMATION

We will only store your personal data for as long as it is necessary. This will typically imply:

* We store names, position, hiring period and employment reference for as long as Visolit is in business.
* Information relating to salaries, bonus payments and other benefits are stored for five years following the end of the accounting year.
* Medical certificates/sick leave notices are stored until we receive repayment from NAV. In case of longer sick leaves, we store the information until the employee is reported well.
* Written warnings are stored for five years, unless there are specific circumstances that require longer storage.
* CVs, applications, evaluations, memos from appraisal meetings etc. are stored for 5 years after termination of the working relationship.
* Other information from the personnel files (such as employment contract, salary information, bonus assessments, information relating to leave of absence etc.) will be kept for 5 years after termination of the working relationship. If we have a specific need, we will also keep disease history for 5 years after the termination of the working relationship, for documentation purposes in connection with insurance claims etc.
* Your email account and personal storage space will be deleted within reasonable time after the working relationship has ended, and at the latest within 6 months.

We will store information for as long as this is necessary by law, and in case of a particular need to store the information, such as in relation to complaints and legal actions.

# YOUR RIGHTS

You have several rights as regards the processing of your Personal Data. Such rights include:

**Information**. Further information on how we process your Personal Data.

**Access**. A copy of the information we have on you.

**Rectification.** Rectification and completion of the information we have on you.

**Erasure**. To request erasure of information if there are no applicable legal grounds for processing such information.

**Restriction**. To ask that we restrict the processing of your information.

**Data portability**. To ask that your information is transferred to you in a structured, commonly used and machinereadable format.

**Objection**. To object to our processing of your Personal Data. You also have the right to object to being subject to a decision based solely on automated processing.

Please note that these rights are subject to limitations as set forth by law. We will respond to your request as soon as possible and typically within one month.

If you find that we process your Personal Data unlawfully, you may file a complaint with the national data protection supervisory. We encourage you to contact us before making such complaint, as we may be able to clarify potential misunderstandings.

# CAMERA SURVEILLANCE

We carry out camera surveillance on the work place to prevent hazardous situations and to ensure the security of our employees. Camera surveillance is carried out in accordance with applicable Swedish and Norwegian law.

# CONTACT INFORMATION

Please contact us if you have any questions, comments or you wish to use your rights in relation to the processing of your Personal Data. The contact information of our Data Protection Officer is listed on our public webpages.