



NORTHERN OFFSHORE GROUP PRIVACY STATEMENT

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PRIVACY STATEMENT

SC43 Utg1
Northern Offshore Group Privacy Statement (20180523, CAH)

Issued by Cornelia Ahlström
Approved by Carolina Ericsson
Revision no. 1
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This Privacy Statement was published May 23rd, 2018.

At Northern Offshore Group we are committed to protect and respect your privacy in compliance with EU- General Data Protection Regulation (GDPR) 2016/679. This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to the use of our products and to our sales, marketing and customer contract fulfillment activities. It also applies to individuals seeking a job in Northern Offshore Group.

It is important that you understand and understand the privacy statement and feel safe in our processing of your personal information. You are always welcome to contact us for any questions.

What is a personal data and what is a processing of personal data?

Personal data is any information that may be directly or indirectly attributed to a natural person such as is in life. For example can images and sound recordings treated in the computer be personal data even though no names are mentioned. Encrypted data and different types of electronic identities (e.g. IP number) are personal data if they can be linked to natural persons.

Processing of personal data is all that happens with personal data. Each action taken Personal data is a treatment, regardless of whether it is performed automated or not. Example On common treatments are collection, registration, organization, structuring, storage, processing, transmission and deletion.

Who are we?

Northern Offshore Group is a range of shipping companies, owners and operators, focusing on specialized vessels within the offshore industry. Our companies main segments are;

- Vessel Management
- Crew Transfer and Crew Transfer Vessels
- Cargo handling
- Innovation for services and solutions at sea
- Energy – Cost efficient lubricants and fuel to the maritime industry
- Recycling – Complete disposal chain of sludge and slope, incl. de-bunkering
- Logistics – One-Stop-Shop with complete logistic chain between land and sea.

Our company's headquarter is located in Gothenburg, Sweden, and our subsidiary companies are based in Sweden, Denmark, United Kingdom and Germany. The headquarters' registered office address is Saltholmsgatan 44, SE-426 76 Västra Frölunda, Sweden.

Northern Activity AB and all subsidiaries in Northern Offshore Group where Northern Activity AB has control directly (more than 50%) or via its subsidiaries (hereinafter referred to as Northern Offshore Group) processes personal data as an employer, as a supplier of services, for marketing purposes and in connection with visits to this website.

Northern Ship Management AB, org. no.: 559004-1843, with address: Saltholmsgatan 44, 426 76 Västra Frölunda, Sweden, is the data controller and our Data Protection Officer can be contacted by email: info@n-o-s.eu



What personal data do we collect as employees and for what purpose (why)?

(Economics, HR)

Purpose	Treatments performed	Categories of personal data
Salary payment, tax payments, insurance, occupational health care	Wage and time reporting programs.	Name, Security Number, Contact Information (E-mail and Phone Number). Account Number. Ev. Note that you choose to leave.
Legal basis: Completion of the employment contract. This collection of your personal information is required so that we can fulfil our commitments.		
Storage period: Storage time during employee term plus 7 years.		

What personal data do we collect about you as a relative's employee and for what purpose (why)?

(HR)

Purpose	Treatments performed	Categories of personal data
Dependent List	All employees have access to the family list via the management system.	Name, phone number
Legal basis: The personal data are collected by agreement with their respective relatives.		
Storage period: Storage time during the employee's period of employment.		

What personal data do we collect as a jobseeker and for what purpose (why)?

(Recruitment, HR)

Purpose	Treatments performed	Categories of personal data
Recruitment of skills	Handling of applications.	Personal letter, CV
Legal basis: The personal data is stored in agreement with the respective applicant		
Storage period: Storage during recruitment period and if necessary after approval for maximum 2 years.		

What contact information do we collect about you as a customer and for what purpose (why)?

(The sales process)

Purpose	Treatments performed	Categories of personal data
In order to handle offer / contract.	Customer Register, Booking Documents, Web Services, Time Reporting Accounting. Project documentation. Payment handling (including collection of credit reports from credit reporting companies).	Name. Corporate. Contact information (e.g. address, email and phone number). Payment history. Payment Information. Credit information from credit bureau



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Legal basis: Completion of agreement. This collection of your contact information is required in order to fulfill our obligations under the agreement.

Storage period: As long as the agreement is valid and for a period of 24 month thereafter in order to handle any complaints.

What contact information do we collect about prospects and for what purpose (why)?

(The sales process)

Purpose	Treatments performed	Categories of personal data
Marketing, recruit new customers.	List of prospects, newsletters, exhibition contacts	Name. Contact information (e.g. address, email and phone number).

Legal basis: Legitimate interest The treatment is necessary to accommodate our and possibly new customers legitimate interest in deepening contact.

Storage period: As long as interest exists. Unregistering at the person's request is made on a regular basis.

What contact information do we collect about you as a supplier and for what purpose (why)?

(Purchasing Process)

Purpose	Treatments performed	Categories of personal data
In order to fulfill the company's purchasing routines and to fulfill the requirements of the ISO certification on the company.	Necessary handling for compliance with company obligations under legal requirements or governmental decisions	Name. Contact information (e.g. address, email and phone number).

Legal basis: Completion of agreement. This collection of your contact information is required in order to fulfill our obligations under the agreement.

Storage period: Until the purchase has been completed (including delivery and payment) and for a period of 36 months thereafter.

From what sources do we retrieve your personal information?

In addition to the information you provide to us, we may also collect personal data from someone else (such as third parties). The information we collect from third parties is as follows:

- 1) Addresses from public records to be sure we have the correct address details for you.
- 2) Credit rating data from credit rating agencies, banks or disclosure companies.
- 3) Information from social media for marketing purposes.

Who can we share your personal information with?

Personal Data Assistants. In cases where it is necessary for us to offer our services, we share your personal data with companies that are so-called personal information assistants for us. A personal information officer is a company that processes the information on our behalf and according to our instructions. We have personal information assistants who help us with:



- 1) Accounting
- 2) Marketing (print and distribution, social media, media agencies or advertising agencies).
- 3) IT services (companies that handle necessary operations, technical support and maintenance of our IT solutions).

When your personal information is shared with Personal Data Counselling, it is only for purposes that are consistent with the purposes for which we have collected the information (e.g. to fulfill our obligations under the Purchase Agreement). We check all Personal Data Counsellors to ensure that they can provide sufficient safeguards regarding the security and confidentiality of personal data. We have written agreements with all personal information officers through which they guarantee the security of the personal data processed and undertake to comply with our security requirements as well as restrictions and requirements regarding the international transfer of personal data.

Companies that are independent personally responsible. We also share your personal information with some companies that are independent personal data administrators. The fact that the company is an independent personally responsible means that we are not controlling how the information submitted to the company will be treated. Independent personal data officers with whom we share your personal information are:

- 1) Government agencies (police, tax authorities or other authorities) if we are required to do so by law or in suspicion of crime.
- 2) Companies dealing with general freight transport (logistics companies and freight forwarders).
- 3) Businesses offering payment solutions (card-insolvent companies, banks and other payment service providers).

When your personal information is shared with a company that is an independent personally responsible person, it applies to the company's privacy statement and personal data management.

Where do we process your personal information?

We always strive for your personal data to be processed within the EU / EEA and all our own IT systems are located within the EU / EEA. However, in case of systematic support and maintenance, we may have to transfer the information to a non-EU country. If we share your personal information with a personal data counsellor who, either himself or through a subcontractor, is established or stores information in a non-EU country. In these cases, the assistant may only share the information relevant to the purpose (e.g. log files).

Regardless of the country in which your personal data are processed, we take all reasonable legal, technical and organizational measures to ensure that the level of protection is the same as within the EU / EEA. In cases where personal data are processed outside the EU / EEA, the level of protection is guaranteed either by a decision of the EU Commission that the country concerned ensures an adequate level of protection or by the use of so-called appropriate safeguards. Examples of appropriate protection measures are approved code of conduct in the recipient country, standard contract clauses, binding company internal rules or privacy shield. If you want a copy of the safeguards that have been taken or information about where these have been made available, please contact us.

How long do we save your personal information?

We will never save your personal information longer than is necessary for each purpose. See more about the specific storage periods for each purpose.



What do you have for rights as registered?

Right to access (so-called register extract). We are always transparent and transparent about how we treat your personal information and if you want a deeper insight into what personal data we are dealing with, you may request access to the information (the information is provided in the form of a registry drawing indicating purpose, categories of personal data, categories of recipients, storage periods, information about where the information has been collected and the existence of automated decision making). Please note that if we receive a request for access, we may ask for additional information to ensure the effective handling of your request and that the information is provided to the correct person.

Right to rectification. You may request that your personal information be corrected if the information is incorrect. Within the stated purpose, you also have the right to supplement any incomplete personal data.

Right to deletion. You may request the deletion of personal data we are dealing with if you: The data is no longer necessary for the purposes for which they have been collected or processed. You object to an interest weighing we have made based on legitimate interest and your reason for opposition weighs heavier than our legitimate interest. You oppose processing for direct marketing purposes. Personal data is processed illegally.

Personal data must be erased to comply with a legal obligation we are subject to. Keep in mind that we may have the right to deny your request if there are legal obligations that prevent us from immediately deleting certain personal information. These obligations derive from accounting and tax legislation, banking and money laundering legislation, but also from consumer law. It may also be possible that treatment is necessary for us to determine, enforce or defend legal claims. Should we be prevented from meeting a request for deletion will occur instead, we block personal data from being used for purposes other than the purpose that prevents the requested deletion. This means that you can request that we do not delete your information.

Right to restriction. You are entitled to request that our processing of your personal data be limited. If you disagree that the personal information we process is correct, you may request limited treatment during the time we need to check whether your personal information is correct. If we no longer need personal data for the set purposes, but you need them to determine, enforce or defend legal claims, you may request limited processing of the task. If you have objected to an interest-bearing interest of legitimate interest that we have made as a legal basis for an end, you may request limited treatment for the time we need to check whether our legitimate interests outweigh your interests in getting the data deleted. If the treatment has been limited in accordance with any of the above situations, we may, in addition to the actual storage, process the data to determine, enforce or defend legal claims, to protect someone else's rights or if you have given your consent.

Right to object to certain types of treatment. You are always entitled to avoid direct marketing and to object to all processing of personal data based on a balance of interest.

Interest Weighing: In case we use a balance of interest as a legal basis for an end, you have the opportunity to object to the treatment. In order to continue processing your personal information after such objection, we need to be able to show a compelling legitimate reason for the current e-mail that weighs heavier than your interests, rights or freedoms. Otherwise, we may only process the data to determine, exercise or defend legal claims.

Direct Marketing (including analyzes performed for direct marketing purposes): You are able to object to your personal data being processed for direct marketing. The objection also includes the analysis of personal data (i.e. profiling) performed for direct marketing purposes. Direct marketing refers to all types of outreach promotional actions (e.g. by mail, email and text). Marketing actions where you as a customer have actively chosen to use one of our services or otherwise sought us to know more about our services do not count as direct marketing (such as product recommendations



or other features).

If you oppose direct marketing, we will discontinue the processing of your personal data for that purpose and terminate any direct marketing action. Keep in mind that you are always able to influence which channels we will use for mailing and personal offers. For example, can you choose to receive only offers from us via email.

Right to data portability. If our right to process your personal data is based either on your consent or performance of an agreement with you, you are entitled to request the data relating to you and which you have provided to us to another personally responsible person (i.e. data portability). A prerequisite for data portability is that the transmission is technically possible and can be automated. A prerequisite for data portability is that the transmission is technically possible and can be automated.

How do we handle social security numbers?

We will only process your personal identification number when it is clearly motivated for the purpose, necessary for secure identification, or if there is any other reasonable reason. We will always minimize the use of your social security number, by using, if it is enough, your birth number instead.

What are cookies and how do we use it?

Cookies are a small text file consisting of letters and numbers sent from our web server and stored on your browser or device. With us, we use the following cookies:

- 1) Session cookies (a temporary cookie that ends when you close your browser or device).
- 2) Durable cookies (cookies remaining on your computer until you delete them or they expire).
- 3) Pre-Cookies (cookies set by the website you visit).
- 4) Third-party cookies (cookies set by a third-party site. These are primarily used for analytics, such as Google Analytics.).
- 5) Similar techniques (techniques that store information in your browser or device in a manner similar to cookies).

The cookies we use usually improve the services we offer. Some of our services need cookies to work properly, while others improve the services for you. We use cookies for overall analytical information regarding your use of our services and for saving functional settings such as language and other tasks.

Can you control the use of cookies yourself?

Yes. Your browser or device allows you to change the settings for the usage and extent of cookies. Go to the settings of your browser or device to learn more about adjusting the settings for cookies. Examples of things you can adjust are blocking all cookies, accepting first-party cookies, or deleting cookies when you close your browser. Keep in mind that some of our services might not work if you block or delete cookies. You can read more about cookies on the Post and Telecom Agency website, www.pts.se.

How are your personal data protected?

We use IT systems to protect the privacy, privacy and access to personal data. We have taken special security measures to protect your personal data against unauthorized or unauthorized treatment (such as unauthorized access, loss, destruction or damage). Only those persons who actually need to process your personal information to fulfill our stated purposes have access to them.



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What does the inspectorate say is the supervisory authority?

The Data Inspectorate is responsible for monitoring the application of the law, and the person who considers that a company handles personal data is incorrectly able to file a complaint with the Data Inspectorate.

How do you contact us easiest with questions about data protection?

Because we take data protection very seriously, we have special employees at the company that handle these issues. We may make changes to our privacy statement. The latest version of the privacy statement is always available on this site. For updates that are of vital importance to our processing of personal data (such as change of specified purposes or categories of personal data) or updates that are not critical to the treatment but which may be of crucial importance to you, you will find information on our website and by e-mail (if you have e-mailed) in good time before the updates start to apply. When we provide information about updates, we will also explain the meaning of the updates and how they affect you.

Your right to complain with a supervisory authority

If you are unhappy with the way in which your personal data has been processed, you may, in the first instance, contact info@n-o-s.eu