

Privacy Policy – Eimskip Norway AS

NO Agency

Eimskip Norway AS (also referred to as “**Eimskip**” or the “**Company**”) is committed to maintaining the accuracy, confidentiality and security of the personal data processed by the Company.

Eimskip is thus committed to complying with applicable data protection legislation at all times and this Privacy Policy is based on the Norwegian act of 15 June 2018 nr. 38 and the Regulation (EU) 2016/679 on the protection of privacy as regards the processing of personal data (“**Data Protection Legislation**”).

In relation to the Company’s agent services, Eimskip processes various personal data on passengers and crew members of the ships serviced by the Company in Norway. That includes contact details, copies of ID cards, information on requested services etc.

In relation to such processing Eimskip acts as a so-called data processor based on the Data Protection Legislation, on behalf of the ship or the operators in question. All of the Company’s processing as a data processor is based on a specific data processing agreement which Eimskip has entered into with the ships or the operators in question. This Privacy Policy does not apply to such processing.

Eimskip however also processes personal data on its customers’ representatives and its suppliers’ or partners’ representatives and the purpose of this Privacy Policy is to provide information on such processing. Eimskip also takes pictures on its premises in relation to the ships Eimskip is servicing, where crew members, passengers and/or other third parties may appear. This Privacy Policy also addresses such processing.

In the Privacy Policy Eimskip is also referred to as the “Company” or “us” and when referring to the individuals Eimskip is processing data on, the Privacy Policy also refers to “you”.

3. Personal data processed by the Company

Personal Data on customers’, suppliers’ and partners’ representatives

Our customers are legal persons, but we may collect personal data on their representatives and employees. The same applies to the Company’s suppliers and/or partners. The personal data we collect on such persons is mainly contact data, such as name, telephone numbers and e-mail addresses, as well as communication history with the Company.

The personal data we collect about representatives and employees of the Company’s customers, suppliers and partners are primarily processed for the performance of a **contract** with the entities such parties represent. This applies for example to contact details so that we can contact you and send you invoices.

If you fail to provide the necessary information we may not be able to enter into a contract with the company you represent regarding the service you wish us to provide and/or we may be unable to fulfil our obligations according to our contract.

We may process your personal data on the ground of **our legitimate interests**, such as communication history which we may use to strengthen our business relationship. We may also process your e-mail address to send you customer surveys and where applicable, direct marketing.

Pictures

Eimskip often takes pictures on its premises in relation to the ships Eimskip are servicing, where crew members, passengers and/or other third parties may appear. Eimskip processes such pictures for marketing purposes and the pictures can be published on the Company's website, in yearly reports, in presentations and/or on social media sites.

The processing is first and foremost based on the Company's **legitimate interests**, but if you are not satisfied with the processing of your photo you have the right to object to the processing as further detailed in Article 5 of this Policy.

In other instances we may process your pictures based on your **consent**.

Where the collection and processing of personal data is based on your consent, you have the right to withdraw it at any time. All communications in relation to a withdrawal or changes of consent shall be directed to privacy@eimskip.com

5. Disclosure to third parties

The Company may disclose your personal data to contractors and other third parties in relation to their work for the Company. Therefore, personal data may for example be disclosed to external parties which provide us with IT services or to other companies within the group the company belongs to.

These third-party service providers may be located outside of Norway. The Company will however not transfer personal data outside the European Economic Area unless such transfer is permitted under applicable data protection legislation. The Company endeavours to inform you about any disclosure of personal data to countries outside the European Economic Area.

Finally, your personal data may be disclosed to the extent permitted or required by other applicable legislation or regulations, e.g. to customs authorities, or to respond to legal actions such as search of premises, subpoenas, or court rulings. Disclosure may also be necessary in emergency situations to ensure the health and safety of the employees of the Company or third parties.

6. How do we protect and safeguard your personal data?

The Company endeavours to take appropriate technical and organisational measures to protect your personal data, with special regard to the nature of the data. For example, the Company has access controls to systems which store data about you. These measures are implemented to secure personal data against accidental destruction or alteration and against unauthorized access, duplication, use or disclosure.

7. Data retention

The Company endeavours to retain your personal data only for as long as necessary in relation to the purpose for which they are processed, unless otherwise permitted or obligated by law.

Contact details on customers' representatives, as well as suppliers' and partners' representatives, are as a rule retained for four years from the end of the business relationship in question.

The Company will in general retain pictures for unlimited time, for historical purposes, unless a consent for the processing is withdrawn or the processing is objected to.

8. Your rights regarding your personal data

You have the right to access and, in certain circumstances, to get a copy of the personal data undergoing processing, as well as information about the processing.

In certain instances, you may also have the right to have your personal data erased, or to have us restrict the processing. You also have the right to have your personal data rectified if the data is wrong or inaccurate. It is therefore important that you keep us informed of changes of your personal data, as applicable.

You may also have the right to receive your personal data, which you have provided to us in a machine-readable format or the right to have us transmit those data directly to a third party.

When processing is based on our legitimate interests you can always object to the processing.

Your rights are however not absolute. Laws or regulations may authorise or oblige us to reject your request of exercising your rights. However, your right to object the processing of your personal data for direct marketing purposes is unconditional.

9. Inquiries and complaints to the data protection authority

If you wish to exercise your rights described in section 8 or if you have any questions about this Privacy Policy or how we process your personal data, please contact us by sending an e-mail to privacy@eimskip.com and we will seek to answer any inquires you may have and instruct you on your rights according to this Privacy Policy.

If you are unsatisfied with our processing of your personal data you are entitled to make a written submission to the Norwegian Data Protection Authority (datatilsynet.no)

10. Contact information

The Company's data protection team supervises compliance with this Privacy Policy. The team's contact information:

Data protection team: privacy@eimskip.com

Company's contact information:

Eimskip Norway AS
Stakkevollvegen 375
9019 Tromsø

11. Revisions to this Privacy Policy

The Company may make changes to this Privacy Policy to reflect changes to our legal or regulatory obligations or how we process personal data. A revised version of this Privacy Policy will be made available on the Company's website.

Any changes to this Privacy Policy will be effective from the time the revised version has been published.

This Privacy Policy was published on April 6th 2021.