

Privacy Policy

Objective and target group

This policy is valid for all Aera operations and all Aera companies.

Content

1. Introduction

This Top document for Privacy forms part of the internal control and governance arrangements for Aera, and is approved by Board of Directors In its role as a Aera and as data processor, as defined in the Directive, and in the GDPR as implemented in Norway it is the Aera’s obligation to ensure and facilitate that the existing applicable privacy regulations are observed, and that the data subjects‘ rights following the regulations are implemented.

In its work to ensure the best possible privacy for Data Subjects, Aera is in the process of implementing an internal control system as defined in the GDPR.

The purpose of this document is to provide an overview of the steps involved to reach compliance with the GDPR for Aera, and to ensure continued compliance.

2. Definitions

Definitions in GDPR, and the definitions herein will apply to all privacy documentation in Aera, unless otherwise defined below.

| Term | Description | Related terms |
|----------------------|--|---|
| Personal data | means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person | Data Subject, Identifiable natural person |

| | | |
|-------------------|--|--|
| Processing | means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction | |
|-------------------|--|--|

3. Aera’s team responsible for privacy related issues

3.1 Board of Directors for Aera

The Board of Directors is accountable for ensuring that Aera’s risks and obligations, hereunder protection of personal data, are adequately and effectively managed and has the responsibility for establishing a strong control environment and systems that fulfils the expectations in the countries where Aera does business, and is consistent with safe and sound business practices. The Board of Directors thus has the ultimate obligation to adopt policy decisions concerning Aera and for the establishment and maintenance of adequate and functioning internal control mechanisms.

3.2 Authority and responsibility

Aera’s CEO is the highest authority on all issues, including privacy risk related issues.

The CEO is responsible for maintaining a sound system of internal control that supports the achievement of policies, values and objectives while safeguarding customers, employees, shareholders and other stakeholders. There is an open and receptive approach to mitigating privacy risk.

The CEO defines boundaries, principles and directives under which the operative execution of privacy risk management is done, and serves as the escalation and resolution body for controversial operative issues and for highest impact risk areas

The CEO has authorized the Compliance officer in Aera to manage and execute policies on a day to day basis.

3.3 Data protection Officer (DPO)

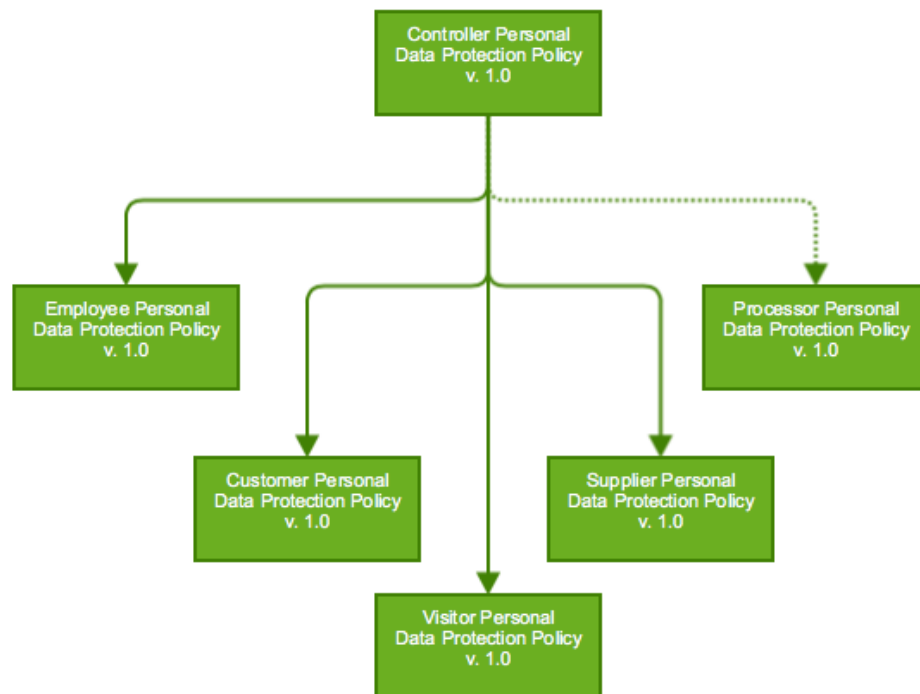
The Data Protection Officer has the day-to-day responsibility for – in accordance with Article 39 of the General Data Protection Regulation (GDPR) - monitoring Aera’s compliance with with any local data protection provisions and with the policies of the controller or processor in relation to the protection of personal data, including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits. The DPO reports to CEO [and Board of directors].

Due to the close relation between privacy and IT security, there is close cooperation between Security Officer, who reports to Chief Operation Officer, and DPO who reports to the CEO and the Board of Directors in the areas of privacy and data security. Aera shall support the DPO in performing his/her tasks referred to in Article 39 of the GDPR by providing resources necessary to carry out those tasks and access to personal data and processing operations, and to maintain his or her expert knowledge.

Aera shall ensure that the DPO does not receive any instructions regarding the exercise of those tasks. He or she shall not be dismissed or penalised by Aera for performing his or her tasks. The DPO shall directly report to the highest management level of the Aera. The DPO may fulfil other tasks and duties. Aera shall ensure that any such tasks and duties do not result in a conflict of interests.

4. Purposes for processing personal data and governing documentation

The policies relating to Aera’s processing of Personal Data is illustrated in the document “Document_Hierarchy” as updated from time to time.



5. Lawful basis for processing

The GDPR requires a lawful basis to be in place in order for any personal data to be processed. In the following, Aera will describe the lawful basis for processing the applicable types of personal data

5.1 Aera's key rules for processing personal data as controller

No processing of personal data will take place unless one or more of the lawful basis below are in place:

| Lawful basis | Description | GDPR Reference |
|--|--|----------------|
| Consent | Explicit, informed ^[1] consent from the Data Subject to the processing of his or her personal data for one or more specific purposes. | Article 6 |
| Contract | The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract | Article 6 |
| Legal obligation | The processing is necessary for compliance with a legal obligation to which the controller is subject | Article 6 |
| Vital interest | The processing is necessary in order to protect the vital interests of the data subject or of another natural person | Article 6 |
| Public interest or official authority | The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller | Article 6 |
| Legitimate interest | The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. | Article 6 |

When the basis for processing as listed above is no longer in place, all personal data shall be anonymized or deleted.

5.2 Aera's key rules for processing personal data as processor

No processing of personal data will take place unless the following lawful basis is in place:

| Lawful basis | Description | GDPR Reference |
|----------------------------------|---|----------------|
| Data Processing Agreement | When Aera is the processor, the lawful basis for processing will be a contract or other legal act under Union or Member State law that is binding on the processor with regard to the controller and that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the controller. | Article 28 |

When the basis for processing as listed above is no longer in place, personal data shall be anonymized or deleted.

All suppliers shall adhere to these rules or similar rules approved by Aera to meet Aera’s requirements set herein

5.3 Lawful basis for processing Employee personal data

| Who is controller? | Who is data subject? | What is Aera’s lawful basis for processing? |
|--------------------|----------------------|---|
| Aera | Aera employees | Contract: the Employee contract |

Aera’s employees sign an employment agreement with the following content:

- Terms & conditions which are identical for all Aera’s employees
- Individual information referring to specific information covering the tasks of the respective employee, individual role, Salary and benefits, pension scheme, place of work, working time, vacation and vacation payment, sickleave , maternity leave etc
- Trial period
- Termination period in trial period and thereafter
- Actions by termination – Off-boarding
- Competition clause
- Confidentiality obligations
- IPR-rights to IPR resulting from the employment
- Information duties by employment
- Availability for employer, and activities outside the employment

In addition, all employees are presented with the Employee Handbook, a document containing important policies and regulations for the Data Controller.

5.4 Lawful basis for processing Customer personal data

| Who is controller? | Who is data subject? | What is Aera's lawful basis for processing? |
|--------------------|--|--|
| Aera | Employees of Aera's customers | Legitimate interest, and contract with the customers |
| Aera | Employees of Aera's prospects and other business contacts | Consent |
| Aera | Individuals who visit Aera's homepage to get information or get in touch with Aera | Consent |

Aera's customers enter into agreements for various service deliveries, and to receive support and in some cases to receive consulting services. The customer contracts may include the following documents:

- NDA
- Customer Agreement
- Service Delivery Agreement

Customers frequently insist on applying own standards, in which case Aera sometime complies.

In addition to the above, Aera provides an overview of its processing in its Privacy statement, available on its homepage.

5.5 Lawful basis for processing personal data on behalf of Customer

| Who is controller? | Who is data subject? | What is Aera's lawful basis for processing? |
|--------------------|--|---|
| Customer | Any individual who is customer of the customer | Data Processing Agreement with Customer |

Aera's customers enter into agreements for Data Controller to provide payment service, and to receive support and in some cases to receive consulting services. A Data Processing Agreement is entered into in addition to the services contracts. Aera provides its template Data Processing

Agreements, but customers frequently insist on applying own standards, which Aera sometime accepts.

It is made clear in all contracts that customer is the controller in relation to the customer’s customer data, and that customer is therefore under obligation to ensure that all data is collected and processed in accordance with applicable law.

Aera shall draft its Data Processing Agreements to ensure compliance with GDPR.

In addition to the above, Aera provides an overview of its processing for Customers’ customers in its Security statement, available on its homepage.

5.6 Lawful basis for processing Supplier personal data

| Who is controller? | Who is data subject? | What is Aera’s lawful basis for processing? |
|---------------------------|---|--|
| Aera | Employees of Aera’s suppliers, partners and resellers | Legitimate interest: The contract between Aera and supplier gives Aera a legitimate interest to process personal data in order to be able to communicate under the agreed services to customer |

Aera’s suppliers vary greatly, and enter into agreements suitable for the services in question.

All commitment to Aera suppliers are subject to Aera’s procurement policy, and all suppliers must commit to Aera’s Code Of Conduct. Suppliers that may process personal data will in all cases be required to sign a Data Processing Agreement with Aera.

5.7 Lawful basis for processing Visitor personal data

| Who is controller? | Who is data subject? | What is Aera’s lawful basis for processing? |
|---------------------------|-----------------------------|--|
|---------------------------|-----------------------------|--|

| | | |
|------|---|--|
| Aera | Employees of Aera’s customers or prospects, ogr any other persons whovisit Aera’s offices for training purposes or meetings | Legitimate interest: Aera has a legitimate interest to process personal data in order to be able to ensure building security, provide documentation, serve food etc. |
|------|---|--|

Aera provides the possibility for customers and interested parties to provide information on the home page in order for them to receive updates, information, invitations etc. Aera’s Privacy Policy, available online, describe the use.

6. Information to data subjects

Information to data subjects will, as a minimum, include the following:

- The name and address of the Aera entity that is the Controller
- The name and address of the person responsible for data processing within Aera, or Aera’s Data Protection Officer
- The purposes of the processing including the contract terms where the controller relies on contract performance as the legitimate basis for processing and the legitimate interests that are relied on, as applicable
- the period for which the data will be processed
- the existence of rights to request access, rectification and erasure or to object to the processing
- the right to lodge a complaint with the supervisory authority, and contact details; recipients or categories of recipients of the personal data; and
- any further information necessary to guarantee fair processing.

All suppliers shall adhere to these rules or similar rules approved by Aera to meet Aera’s requirements set herein.

7. Documentation of data and processing facilities

This section describes personal data processed in Aera, and Aera’s processing facilities.

7.1 Overview

In the course of its business, Aera process personal data from, Aera customers, Aera employees, applicants to positions, service providers, suppliers, subcontractors, visitors and prospects. For

such data, Aera is the Controller, as defined in the EU General Data Protection Regulations (GDPR). The processing of such data is described in the following policies:

- Employee Personal Data Protection Policy
- Customer Personal Data Protection Policy
- Supplier Personal Data Protection Policy
- Visitor Personal Data Protection Policy

In addition, Aera process personal data in connection with the services delivered to its customers. Such data is controlled by Aera's customers, and may be personal data from Aera's customers' or customers' customers as the case may be. For such data, Aera is the Processor, as defined in the EU General Data Protection Regulations (GDPR). The processing of such data is described in the Processor Personal Data Protection Policy.

An up to date overview of systems and components where personal data is stored or and processed can be found in the Aera enterprise architecture repository.

7.2 Transfer of personal data to Third Parties/ Sub-Processing

- Sub-processing of Personal data in the role as Processor is governed by the Data processor agreement entered into with each Data controller on whose behalf the "Data Controller" acts as a Data processor
- Transfer and Sub-processing of Employee Personal Data, Customer Personal Data, Supplier Personal Data and Visitor Personal Data is governed by the respective Data Protection Policy (Ref Section 1)

7.3 Correction and deletion

Aera's processes to ensure that data is corrected or deleted according to GDPR follows for each category of Data Subjects from guidelines in the following policies:

- Data processed by Aera as processor for its customers – the Data processor agreements
- Employee Personal Data Protection Policy
- Customer Personal Data Protection Policy
- Supplier Personal Data Protection Policy
- Visitor Personal Data Protection Policy

8. Procedures for audit and control

8.1 Management review

A review of Aera's managing of privacy is part of a minimum yearly review by the management.

8.2 Revision and internal audit

The personal data protection Policy is within the scope of Aera Internal Control scope. Process for audit is described in the Audit Management Policy.

8.3 Non-conformity

Aera shall establish procedures and routines in order to react according to breach and other non-compliant events. Aera Whistle blowing policy applies to all areas of breach in Aera, including the privacy area.

If breach is discovered as part of management review, or as part of revision, reporting to IT Security officer and to Data Protection Officer shall be done without delay.

8.4 Improvement action and follow up

Any breach shall be assessed by Data Protection Officer. Report to the top management shall be done without delay.

In cases where reports to authorities, customers or data subjects are required according to applicable law, such report will be performed within the required timeframes.

In cases where report to customers or data subjects are required according to an agreement with customer, such report will be performed within the required timeframes.

9. Signatures

This Enterprise Personal Data Policy document is accepted and approved by the board of directors in Aera.