Privacy Policy

Objective and target group

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

Content

1. Introduction

This policy forms part of the internal control and governance system in Aera and is approved by Board of Directors. The purpose of this policy is to ensure compliance applicable privacy regulations and that the data subjects' rights are protected.

2. Definitions

Definitions in GDPR will apply to all privacy documentation in Aera, unless otherwise defined in this policy.

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, organization, 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 Aera's Board of Directors

The Board of Directors is responsible for oversight and governance of Aera, including ensuring adequate privacy compliance.

3.2 CEO

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. This includes privacy.

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)

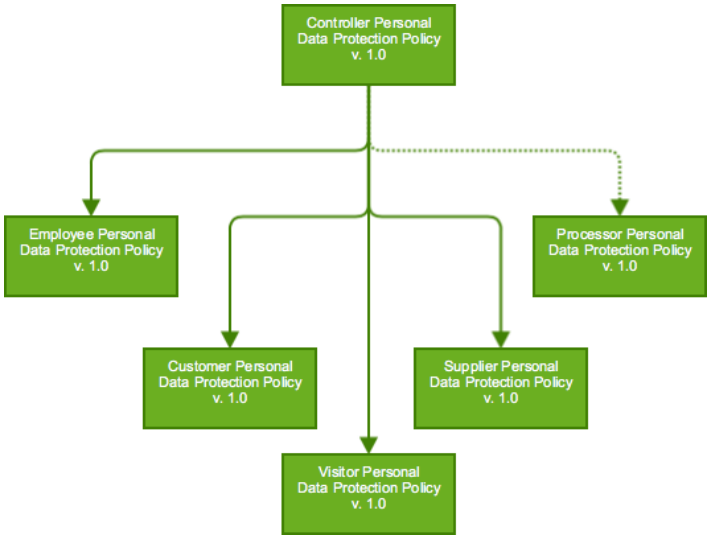
The Data Protection Officer has the day-to-day responsibility for – in accordance with Article 39 of the General Data Protection Regulation (GDPR) - monitoring Aera's compliance with with applicable data protection provisions and with the policies of the controller or processor in relation to the protection 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 the 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 the CEO, 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 the performance 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/her expert knowledge.

Aera shall ensure that the DPO does not receive any instructions regarding the exercise of those tasks. He/she shall not be dismissed or penalized by Aera for performing his or her tasks. The DPO may fulfill 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 for any personal data to be processed. In Aera, this is the lawful basis for processing the following 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 consent from the Data Subject to the processing of his or her personal data for one or more specificpurposes.	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 atthe 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 officialauthority 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, exceptwhere 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:

Lawfulbasis	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 from Aera's systems.

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's employees	Contract: The Employee contract

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

• Terms & conditions which are similar 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, sick leave, 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	Legitimate Interest
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, to which Aera sometimes complies.

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 in addition to the services contracts. Aera provides its template Data Processing Agreements, but customers frequently insist on applying own standards, which Aera sometimes accepts.

It is made clear in all contracts that customer is the controller in relation to the customers' 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 re-sellers	Contract

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

All suppliers must commit to Aera's Code of Conduct. Suppliers that may process personal data on behalf of Aera will in all cases be required to sign a Data Processing Agreement.

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, or any other persons who visit 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.

6. Information to data subjects

Information to data subjects for which Aera is the Controller 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.

This information is generally available on Aera's webpage. 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 processes personal data from, Aera's customers, Aera's 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

These policies are approved by the CEO.

In addition, Aera processes 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. This policy is approved by the CEO.

An up-to-date overview of systems and components where personal data is stored or and processed can be found in the Aera's 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's Internal Control scope. Process for audit is described in the Audit Management Policy.

8.3 Non-conformity

Aera has procedures and routines in order to react according to breach and other non-compliant events. Aera´s Code of Conduct, containing whistleblower provisions, apply to all areas in Aera, including the privacy area.

If a breach is discovered as part of management review, or as part of an audit, 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 time frames.

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 time frames.

9. Signatures

This Enterprise Personal Data Policy document is approved by the Board of Directors in Aera, latest updated December 2020.