



EcoNova's Privacy Policy Statement

Version 2018-11 EN

Who is the data controller for your personal data?

The data controller is **EcoNova AS**, organization no. 982 098 858 MVA. The company's visiting address is Strandveien 12, NO-1366 Lysaker, Norway. The company's postal address is Postboks 148, NO-1300 Sandvika, Norway. The best way to contact us is by sending an e-mail to econova@econova.no.

Why do we process personal data? What do we store, who has access, and what is our legal basis for processing the data?

We process personal data pertaining to three main groups of individuals: respondents to our surveys; our business partners; and individuals formally affiliated with EcoNova.

- 1. Respondents to our surveys:** We undertake questionnaire-based surveys such as personality profiles, employee satisfaction surveys and management surveys.

We obtain personal data from our clients and/or from you as a survey respondent. The need for personal data varies from one survey to another. Sometimes we may only need your e-mail address, in order to grant you access rights to complete the survey, and the name of your organization and unit, so that your responses are compiled correctly. Other times we may need to know more. You will be given information that is adapted to the individual survey you are asked to complete. You can then decide whether or not to consent to EcoNova storing personal data pertaining to you. Your consent constitutes our legal basis for processing your personal data.

The participation in our surveys is voluntary. In practice, however, it may be the case that an employer or organization expects you to participate. For example, choosing not to complete a personality profile in connection with a job application process will make it difficult to assess your suitability for the position in question.

If you are someone about whom others are asked questions in a survey, we will also seek your consent (which will constitute our legal basis).

EcoNova usually carries out surveys in cooperation with one of its client organizations. It is normal practice for all the organizations involved to process personal data pertaining to you. Like us, our client organizations are obliged to process personal data in accordance with the law, and must prepare their own privacy policy statements.

The validity period during which we may disclose a report pertaining to an identified person is six months from the date on which the report was completed and submitted to our client for the first time. If we are asked to disclose the report again after six months, we may not do so without obtaining new consent from the person discussed in the report. Nor may we disclose the report to parties other than the client who commissioned the survey without obtaining new consent from the person discussed in the report.

Regarding the technical implementation of our surveys, we cooperate with Survaid AS, which is responsible for the online survey solution. In some cases Survaid will have access to some personal data, and we have therefore established a data processor agreement with them.

We never use your e-mail address to distribute anything other than access rights to the survey(s) you participate in, with one exception: you may be asked for new consent in connection with research activities. Your participation in such cases will be completely voluntary.

Please note that the responses you give in our surveys do not constitute personal data unless they can be identified. When we erase personal data pertaining to you, we do not erase the responses you gave, only the information about you that can identify you as the respondent. EcoNova uses the responses given in our surveys for purposes of research and product development to develop and improve our questionnaires.

2. Contact persons in our business partners: Econova has a legitimate operational interest in processing personal data on past, present and future clients, suppliers, subcontractors and business partners.

The information we store includes: name, telephone number, e-mail address, business address, age, job title and employer. We can also store follow-up notes and historical data pertaining to deliverables and customer relationships, primarily at organizational level but also at individual level when relevant.

We obtain this information either from the individuals themselves or from others in the individual's organization. Any information beyond the basic information needed to maintain contact is given voluntarily.

In some cases there may be a need to store CVs, qualifications, etc. This is (and must be) in the interests of the individual concerned, who must be informed accordingly.

We never disclose personal data about our contact persons to others unless it follows naturally from the dialogue we have with that individual and the individual understands this (and that there is an interest in this information on the part of the recipient) or unless the individual gives his/her consent.

We only distribute newsletters to business partners who have given their consent to receive them.

3. Individuals who are formally affiliated with EcoNova: These include employees, owners and board members, including former and future employees. These individuals are notified through EcoNova's internal communication channels and through direct contact with the individuals concerned. If you belong to this group, contact us with any questions you may have about what personal data we have pertaining to you, our legal basis for processing such personal data, etc.

How long do we store personal data pertaining to you?

1. Respondents to our questionnaires: The retention time will be stated in the information on consent. The retention time for surveys is 10 years. Consequently, personal data on respondents to our questionnaires will be retained by us for 10 years. Please note that clients who have received the

report may have other guidelines governing retention times. Personal data on respondents in personality profiles will be retained in anonymised form for more than 10 years, for research purposes. This is because of potential public interest that may derive from future research. We are not permitted to use these data for anything or to disclose them to anyone without first seeking new consent from you, specifying how and why they will be used.

- 2. Contact persons in our business partners:** We conduct annual reviews of this information, and delete it when we no longer have a legitimate reason to retain such information, for example when a contact person is no longer affiliated with the business partner.

How are personal data protected?

All personal data are securely stored using multiple technical and practical protective measures to prevent unauthorised parties from accessing them.

Personal data concerning respondents to our surveys are not processed or stored in our online technical solution. Responses are identified using a code to which only the parties working on the survey have access.

Personal data in our personality and management surveys are securely stored in a separate personal data filing system that is stored on a separate, closed medium without internet access. Links to responses can only be obtained using a code.

When we share reports from surveys with our clients, they are either anonymized, encrypted or transmitted via a closed medium (paper, disk or USB flash drive).

EcoNova is a small company with a small staff. All processing of personal data is done manually, which means that the data are personally processed and assessed for storage.

We never use fully automated systems for collecting and storing personal data.

We do not cooperate with organizations outside the EU/EEA area, and therefore do not transmit personal data outside the EU/EEA area.

What are your rights regarding the personal data we store pertaining to you?

Pursuant to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), we recognize the following rights pertaining to the processing of your personal data:

- 1. Right of access.** You have the right to obtain confirmation as to whether or not personal data concerning you are being processed by us. You also have the right to access the personal data concerning you that we are processing.
- 2. Right to rectification.** You have the right to have inaccurate personal data concerning you rectified.
- 3. Right to erasure.** You have the right to have personal data concerning you erased on the grounds that the processing is unlawful or that the purpose for processing or collecting them no longer applies.
- 4. Right to restriction of processing.** You have to right to request that the processing or parts of it be restricted if such processing is unlawful.
- 5. Right to object.** You have the right to object to the processing of your personal data for direct marketing purposes or on grounds relating to your particular situation, unless we can demonstrate compelling legitimate grounds for processing them or unless such processing is necessary for exercising or defending legal claims.
- 6. Right to withdraw consent.** You have the right to withdraw your consent to the processing of your personal data. The withdrawal of consent has no retrospective effect.
- 7. Right to lodge a complaint.** You have the right to lodge a complaint with the Norwegian Data Protection Authority (or equivalent body in the country in which the data subject lives or where the breach is committed) concerning the processing of personal data.
- 8. Right not to be subject to a decision based solely on automated processing.** You have the right not be to subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which similarly significantly affects you. This does not

apply if it is necessary for entering into a contract, is permitted by law, or is based on your explicit consent. (EcoNova does not perform such automated processing).

Please keep in mind that the responses given in our surveys do not in themselves constitute personal data until the respondents can be identified. For example, if we delete personal data pertaining to you, it will no longer be possible to know that you gave those responses, and we may continue to store them.

If you wish to exercise your rights, send an e-mail to econova@econova.no. When doing so, please declare your personal identity by stating your full name and e-mail address, and specify which right(s) you wish to exercise.

You may also ask the Norwegian Data Protection Authority (www.datatilsynet.no) to ensure that your rights are protected.

The exercise of these rights is free of charge unless your enquiry is deemed groundless or exaggerated. In such cases we have the right to charge a reasonable fee for any administrative costs incurred.