



# EPIM JQS Privacy Policy

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## 1 Introduction

This document describes our handling of personal data, within the EPIM JQS service for you as a User of the service. Privacy principles common to all EPIM Services, which therefore also applies to this service, are described in the EPIM Privacy Policy available at [www.epim.no/privacy](http://www.epim.no/privacy).

## 2 Which personal data do we collect?

### Account information

As a User of EPIM JQS, you will have a EPIM JQS user account containing following information about you:

- Name
- Organisation (employer)
- Email
- Mobile number
- Office phone number
- Account status

### Data collected when you use EPIM JQS

EPIM JQS is a compliance service where integrity of the information within the service is important. The system will store certain user activity information, such as by whom and when objects (documents, folders etc) were created, updated, moved, deleted, downloaded and distributed.

### Group and role membership information

Administrative users in your organization will manage your access to the service. Such assignments and changes to your roles and access groups are stored. This is due to strict requirements that the service shall support transparency about who can access what, including history.

### Data you provide us directly

When you communicate with us, contact our customer support teams or respond to a survey, you will provide information to us.

## 3 How do we process your personal data?

The personal data collected as described in previous section is processed as follows:

**To provide you support and guidance**, including to:

- Providing you efficient EPIM Service support via service desks
- Help diagnose problems reported by you to the service desk
- Inform you about possible compatibility issues with the browser you use
- Improve your web experience
- Sending you important information, e.g. in case of service unavailability

### Manage security in EPIM Services by

- Verifying your identity using EPIM ID as part of the log-in process
- Monitor your log-in activities and account modifications to help you detect and prevent fraud and abuse of the EPIM Services.

### **Service improvement**

- Aggregation to analyse and improve the performance of the service, but where data is then anonymized.

### **For our and User organisation's legitimate interests, including to:**

- Be in compliance with requirements between EPIM and your company as available on [www.epim.no/terms](http://www.epim.no/terms).

### **Allow other Users of the Service to interact with you**

As a User of EPIM JQS you will be able to see contact details for other user organisations in EPIM JQS.

## 4 Do we share your personal data?

Except as described in the Agreement or above, personal data will not be transferred or provided to any third parties.

## 5 Transfer of personal data to third countries

Except as described in the Agreement or above, personal data will not be transferred or accessed from outside EU/EEC.

## 6 Do we retain your personal data?

When you no longer have a need or legal right to have a user account, the user account is closed by an administrative user in your company. User activity information and account information will be retained due to integrity requirements in EPIM JQS.

## 7 Subcontractors

Below the list of Contractors and subcontractors which conduct processing of personal data on behalf of EPIM as part of delivery of the Service.

Name	Tasks/deliverables	Within EU/EEC (Y/N)	Basis for transfer (N/A, PC, SCC, AD) <sup>1</sup>
EVERY Norge AS	<ul style="list-style-type: none"><li>• Application Management</li><li>• Application Development</li><li>• 1<sup>st</sup> line user support</li></ul>	Y	N/A
CEGAL AS	<ul style="list-style-type: none"><li>• Platform as a Service (PaaS) provider</li><li>• Monitoring</li></ul>	Y	N/A
EFAB AS	<ul style="list-style-type: none"><li>• User organisation onboarding support</li></ul>	Y	N/A
INFOPULSE UKRAINE LLC	<ul style="list-style-type: none"><li>• Application Development</li><li>• 2<sup>nd</sup> and 3<sup>rd</sup> line support</li></ul>	N	SCC

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<sup>1</sup> N/A = Not applicable, PC = Privacy Shield, SCC = Standard Contractual Clauses, AD = Adequacy Decision