

EPIM ID Privacy Policy

Version: July 2018

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1 Introduction

This document describes our handling of personal data, within the EPIM ID service for you as a User of the service. For privacy terms common to all EPIM Services, which therefore also apply to EPIM ID, please refer to EPIM Privacy Policy available at www.epim.no/privacy.

2 Which personal data do we collect?

We collect personal information in connection with EPIM ID sign-up process, and your subsequent use of your EPIM ID account when you interact with Services integrated with EPIM ID. Below a description of the categories of personal data we collect.

Account information

When you create an EPIM ID account and do updates to your EPIM ID account via www.epim-id.no you actively provide information about yourself. This information includes:

- Name
- Organisation (employer)
- Personal company e-mail address
- Mobile number (optional)
- Office phone number (optional)
- Account status
- Unique non-sensitive reference to the 3rd party authentication solution you desire to use to prove your identity for recurring use of your EPIM ID account, e.g. Norwegian Bank ID.
- A picture of yourself (**See note 1 below**)
- A picture of your passport (**See note 1 below**)

If your organisation has implemented an automatic integration towards EPIM ID (federation), your personal information will be automatically provided by your User organisation, and you will not be able to modify your EPIM ID profile data yourself. Please contact your organisation and request updates to your user information when/if required.

Data collected when you use your EPIM ID account

- **In data exchange between you and the 3rd party authentication provider**

Part of the sign-up process and for recurring log-in to your account EPIM ID use trusted 3rd Parties to confirm your identity, e.g. Norwegian Bank ID.

The authentication process with trusted 3rd Parties is handled as a secure data exchange directly between you and that Identity provider. EPIM ID will only receive the result of the Authentication that does not include sensitive information, but typically only your name and the result of the Authentication attempt (success/failure).

- **Information about the use of your EPIM ID account towards integrated services**

¹ Only collected if you use authentication method «Signicat ID-paper» part of the account creation process. Photo is taken by you allowing the use of the camera on your end user device during the sign-up process web interaction. Information is deleted same day as completing the authentication step and is under no circumstances stored/retained.

We register information about login and logout on your EPIM ID account. We also register limited information about which EPIM services you access using your EPIM ID account as log-in method.

- **Technical information about your device and internet connection**

We use server logs and other tools to record technical information about your device, connection to our Services and cross-device usage. This information typically includes operating systems, web browser versions, IP addresses and session-based authentication cookies, and unique identifiers.

- **Cookies and other technologies that store data locally on your device**

When you use EPIM services that make use of EPIM ID for log-in purposes, we use different technologies to recognize you as a User and provide a seamless access to the services. For example, we use cookies, so you do not have to log in again every time you visit an application using EPIM ID.

3 How do we process your personal data?

The personal data we collect are processed as a part of:

Account sign-up process

for us to be able to support secure establishment of your personal EPIM ID account.

Recurring log-ins

where EPIM ID will use your personal data as part of authentication requests we receive from application services using EPIM ID for authentication purposes.

Managing security by

- verifying your identity part of sign-up process and recurring use of your EPIM ID
- automatic monitoring of your EPIM ID account activities to help you and your User organisation to prevent abuse of your EPIM ID account and following access to Services using EPIM ID as part of their log-in process.

Service improvement

where we may aggregate and analyse and improve the performance of the EPIM ID service, but where your data is anonymized in advance.

Providing you support and guidance, including to:

- Provide you efficient support via service desks
- Help diagnose problems reported by you to the service desk
- Inform you about possible compatibility issues with your end-user equipment, e.g. the browser type you use.
- Sending you important information, e.g. in case of service unavailability, or important information about new features and/or functionality.

For our and your employer (User organisation) legitimate interests, including to:

- Deliver EPIM ID in compliance with requirements between EPIM and your company as available on www.epim.no/terms.
- Performing our obligations set forth by applicable law and regulatory authorities
- Ask you to on regular basis reconfirm your need for an EPIM ID account to support your User organisations leavers processes to ensure EPIM ID accounts no longer needed are closed down as soon as possible.

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?

We keep your EPIM ID account data, including change history, for as long as your account is active. If your account is deleted either by an EPIM ID administrator in your company or by yourself using the “Delete me” functionality available from your personal EPIM ID profile available at www.epim-id.no, your EPIM ID account will be immediately deleted.

Other types of personal data collected as described in section 2, including backups of such, are kept for up to 12 months. This is to assure that EPIM ID can:

- Provide support to applications using EPIM ID for authentication purposes, e.g. part of investigations concerning possible misuse of application access.
- Support investigations concerning unlawful acts where EPIM ID accounts are deliberately or mistakenly deleted by parties other than the account holder or an EPIM ID administrator in your organisation.
- Support controlled phase out of your account when deleted.

Each application using EPIM ID for authentication will typically also store logs of your user activities. For details about logging done by each EPIM ID integrated application please refer to that application’s privacy policy.

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) ²
ATEA AS	<ul style="list-style-type: none"> • Application Management • Application Development 	Y	N/A
Signicat AS	<ul style="list-style-type: none"> • Provider of 3rd party eID integrations in use in EPIM ID • Provider of the Signicat Id-paper authentication method for users without access to other supported 3rd party eIDs. 	Y	N/A
Basefarm AS	<ul style="list-style-type: none"> • Provider of hosting of services and core systems for Signicat AS. 	Y	N/A
OmnitechIT Security AS	<ul style="list-style-type: none"> • Application Development 	Y	N/A

² N/A = Not applicable, PC = Privacy Shield, SCC = Standard Contractual Clauses, AD = Adequacy Decision

BuyPass AS	<ul style="list-style-type: none">• Provider of BuyPass Code being a mobile app providing multi factor authentication of Users without Norwegian Bank ID or other EPIM ID supported 3rd Party eID.	Y	N/A
Cegal AS	<ul style="list-style-type: none">• EPIM's Platform as a Service (PaaS) provider	Y	N/A
IBM AS	<ul style="list-style-type: none">• Provider of basis software• Provides software specialist support	N	SCC
Micro Focus AS	<ul style="list-style-type: none">• Provider of basis software• Provides software specialist support	Y	N/A

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