



License2Share Privacy Policy

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Contents

- 1 Introduction 2
- 2 Which personal data do we collect? 2
- 3 How do we process your personal data? 2
- 4 Do we share your personal data? 3
- 5 Transfer of personal data to third countries 3
- 6 Do we retain your personal data? 3
- 7 Subcontractors 3

1 Introduction

This document describes our handling of personal data, within the License2Share 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.

2 Which personal data do we collect?

Account information

As a User of License2Share, you will have a License2Share user account containing following information about you:

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

* This information is read-only in License2Share, provided from your EPIM ID account. For details concerning EPIM ID please refer to EPIM ID privacy policy available on www.epim.no/privacy.

Data collected when you use License2Share

License2Share is a collaboration solution where integrity 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 compability 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.
- Compliance requirements as License2Share also serves the purpose as an archive solution for official sharing of documents within Joint Ventures on NCS where it is essential to have audit trails on which user uploaded or modified documents on behalf of his/her employer.

Allow other Users of the Service to interact with you

All Users will be able to see contact details for all users in License2Share e.g. using User Search functionality available from within the tool such as e.g. "User search" and "Member search". This is to fulfil the intention of License2Share as a collaboration tool for JV administration on NCS.

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 necessary elements of account information will be retained due to integrity requirements in License2Share.

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) ¹
CGI Norge AS	<ul style="list-style-type: none"> • Application Management • Application Development • Servicedesk towards Super Users in the Service 	Y	N/A
Contesto AS	<ul style="list-style-type: none"> • Application Development 	Y	N/A
CEGAL AS	<ul style="list-style-type: none"> • Platform as a Service (PaaS) provider • Monitoring 	Y	N/A
OpenText	<ul style="list-style-type: none"> • Provider of the basis software platform Content Server • Provides software specialist support 	N	AD

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