

EPIM Privacy Policy

Version: April 2018

Contents

1	Introduction	2
2	Why do we collect personal data?	2
3	Which personal data do we collect?	2
4	Do we use cookies and automatic data collection tools?	3
5	How do we process your personal data?	3
6	Do we share your personal data?	3
7	Transfer of personal data to third countries	4
8	Do we retain your personal data?	4
9	What are your rights?	4
10	How do we protect your personal data?	5
11	Changes to this Privacy Policy	5
12	Contact us	6

Deprecated version

1 Introduction

EPIM is a non-profit membership association, established in November 2007 and governed by the Operators on the Norwegian Continental Shelf. We provide a toolbox of Services defined by and for our Members. For more info about EPIM visit our homepage www.epim.no.

We are committed to protecting and respecting your privacy.

This policy has been developed to explain how we may collect, process, share, transfer and retain your personal data when you are acting as:

- A User of an EPIM Service, meaning an individual having a user account in one or more of EPIM's Services, and/or
- A company representative towards EPIM, where you have been appointed by your company, being an EPIM User organisation, to fulfil certain duties and responsibilities towards EPIM.

The Privacy terms, which consist of this general EPIM privacy policy and specific privacy policies for each EPIM Service, are all available at www.epim.no/privacy.

2 Why do we collect personal data?

We collect and process personal data in order to be able to provide the Services to the User organisations.

Our collection and processing of personal data is necessary in order to enter into and/or perform a contract regarding the Services, therefore, necessary for the purposes of the legitimate interests pursued by your company.

3 Which personal data do we collect?

We do not collect any sensitive personal data, and will only collect limited personal data required to be able to fulfil our role as a provider of information sharing services according to agreements and regulations governed by our Member organisations. Our collection and use of personal data is in accordance with applicable data protection legislation (including GDPR) and embedded into EPIM's processes and procedures.

The processing of personal data by EPIM on behalf of the User organisation only covers categories of personal data which are implied under the Agreement for the purpose of entering into the Agreement, management and/or follow-up of the Agreement and providing the Services, and only to the extent and as long as necessary to fulfil such purposes.

EPIM may and will use system event information for enabling secure and efficient delivery and operation of the Services and/or to identify and correct security Incidents. Such information is not stored longer than necessary to reach the goal of secure operation and are not shared with the User organisation or Third parties (sharing with subcontractors on a need-to-know basis will be allowed). The User organisation acknowledges that EPIM is not obliged to disclose information to the User organisation in respect of individual Users' use of the Services.

When you are a User of an EPIM Service

Our focus is to only collect data required to provide you secure access to the service, as well as fulfilling our obligations to your company according to user agreement framework between

EPIM and your company. The terms of such agreement are available on www.epim.no/terms. The limited personal information that we process in each individual EPIM service is described in the service specific privacy policy available at www.epim.no/privacy. When you use our Services, EPIM act as data processor, and your User organisation having instructed you to use the given Service, act as data controller.

When you are a company representative

EPIM's governance and provisioning of Services requires us to maintain various contact points towards our User Organisations, subcontractors and other external organisations.

When you have been instructed by your company to fulfil certain duties and responsibilities towards EPIM, we may collect limited personal information about you that typically include name, email, organisation you represent, title/role and phone numbers. The personal information is typically stored in our CRM system and other supportive system used for efficient management of our external stakeholders. In these settings EPIM act as data controller as we define the use of the personal data.

4 Do we use cookies and automatic data collection tools?

EPIM's services may store and retrieve information, such as cookies, on your devices. Such storage and retrieval of information will in most cases be technically required in order to provide the service and requires no further actions from you.

We will inform you in each individual Service's Privacy Policy if an additional action from you is required.

For more background info about cookies, please refer to http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm

5 How do we process your personal data?

When you are a User of an EPIM Service

Details on how your personal data are being processed are specified in the individual Service's privacy policy available at www.epim.no/privacy.

When you are a company representative

Depending of the type of contact point you act as we may process your personal data to:

- Send your relevant information concerning aspects of where you are appointed as contact point in your organisation.
- Granting you access to any supportive systems EPIM use for dialog with external staff, including but not limited to document sharing systems and contract portal.
- Process orders, invoicing, payments and other financial follow up.

6 Do we share your personal data?

EPIM is a non-commercial actor, and do not sell or market any personal information we collect about you to any Third party. EPIM may only share your personal data in following settings:

With EPIM subcontractors

We may share your personal data with EPIM subcontractors directly involved in the delivery of an EPIM Service, e.g. subcontractors delivering user authentication services and providing service desk functions. EPIM will in all such matters have a data processor agreement towards the subcontractor, preventing use of your personal data for other purposes than defined by the Privacy terms.

Within an EPIM Service

Each individual EPIM Service may be designed to share limited information about you with other Users of the service, as the services are used to collaborate across organisational boundaries. For details reference is made to each Service Privacy Policy available at www.epim.no/privacy.

7 Transfer of personal data to third countries

As a principle EPIM will host all our Services and supportive solutions within EU.

If the processing requires transfer of data for processing outside of the EU or involvement of subcontractors outside of the EU, we will make sure that the agreement with that subcontractor includes data processor agreements based on the EU Standard Contractual Clauses or that the data importer is certified according to the EU/US Privacy Shield framework, if located in the US. In such cases, we will also inform our User Organisations about the export of data.

8 Do we retain your personal data?

When you are a User of an EPIM Service

Details regarding retention of personal data is specified in each individual Service's Privacy Policy available at www.epim.no/privacy.

When you are a company representative

When you no longer represent your company towards EPIM we primarily delete your accounts from our CRM and other support solutions.

The information systems might still have traces of your historic activities from when acting as representative from your organization as EPIM needs to store limited information to document the User organisations involvement and representation in EPIM governance activities. Examples could be document metadata (created by), approval history on documents and other information EPIM needs to have documented historically to document our user organisation involvement in the governance of the services we provide to our user organisations.

9 What are your rights?

When you are a User of an EPIM Service

For personal data processing within an EPIM Service, EPIM act as a data processor, only processing data according to the data processor agreement we have in place with your company, acting as the data controller. You should contact your company if you have

questions about privacy within a given EPIM Service not being answered by this privacy policy and service privacy policies available at www.epim.no/privacy. Similarly, you should contact your company if you want to exercise any of your other rights regarding protection of personal data.

When you are a company representative

1. Right to opt-out of communications from EPIM

You have the right to opt-out of receiving newsletter communications from EPIM and can do so by either following the instructions for opt-out in any newsletter communication or contacting us via e-mail on mail@epim.no.

Please note that even if you opt-out from receiving communications, you may still receive administrative communications from EPIM, such as order confirmations and notifications about your account activities (e.g. account confirmations and personal profile changes).

2. Access and rectification

You have the right to request a copy of what personal data EPIM have stored about you.

You may send us a request for this to privacy@epim.no. You also have the right to request that EPIM correct any inaccuracies in your personal data, unless EPIM have enabled you to do such updates yourself via appropriate "My account" functionality within the supportive solutions we use in the collaboration with representatives from our external stakeholders.

3. Right to be "forgotten", object to processing, data portability

Unlike providers of consumer services, EPIM only store information about you as a representative of your company.

Therefore rights to be "forgotten", object to processing and data portability are considered not relevant for our processing of personal data regarding you.

4. File a complaint with a data protection authority

If you believe that our processing of personal data relating to you infringes applicable laws, you may file a complaint with relevant data protection authority.

10 How do we protect your personal data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your personal data against loss, misuse, unauthorised access, disclosure, and alteration. While we are dedicated to securing our Services, and supportive solutions, you are responsible for securing and maintaining the privacy of your password(s) and account/profile registration information and verifying that the personal data we maintain about you is accurate and current.

11 Changes to this Privacy Policy

We may revise this policy and the service specific privacy policies on www.epim.no/privacy from time to time to reflect changes to our business, the Services, or applicable laws.

The policies on www.epim.no/privacy will be effective as of the date stated at the top of each policy.

If the revised version includes a substantial change, we will inform relevant contractual contact point in your organisation according to rules stated in the contract between EPIM and the user organisation as available on www.epim.no/terms.

12 Contact us

We value your opinion. If you have any comments or questions about our privacy framework, any unresolved privacy or data use concerns that we have not addressed satisfactorily, or concerning a possible breach of your privacy, please send them to privacy@epim.no.

We will handle your requests or complaints confidentially. Our representative will contact you to address your concerns and outline the options regarding how these may be resolved. We aim to ensure that complaints are resolved in a timely and appropriate manner.

Deprecated version