

General Data Protection Procedure

Contents

1. PURPOSE.....	2
2. DEFINITIONS	2
3. SCOPE	2
4. PROCEDURE	2
4.1. Assessment	2
4.2. Implementation.....	3
4.3. Approval.....	3
4.4. Collection – Data Transfer	3
4.5. Storage and Accesses	3
4.6. Rectification and Erasure	4
4.7. Response time	4
4.8. Breach of Security	4
4.9. Data Processing Agreement	4
5. APPLICABLE LEGISLATION	5



GENERAL DATA PROTECTION PROCEDURE

1. PURPOSE

The purpose of this procedure is to provide accurate information about how Norwegian Offshore Rental AS handles personal data and the rights of the data subjects in compliance with Norwegian law “Lov om behandling av personopplysninger (Personopplysningsloven)” lov-2018-06-15-38 and the General Data Protection Regulation “GDPR” (EU) 2016/679.

2. DEFINITIONS

Norwegian Offshore Rental AS: NOR.

Data subject: a natural person that can be identified or identifiable, either directly or indirectly; this definition includes, employees, customers, suppliers, or just visitors.

Personal data: information that can identify a person.

3. SCOPE

1. The procedure shall aim to protect data subjects from whom NOR processes personal data. The HR manager and the Finance Manager shall be responsible for the implementation and assessment of the procedure.

4. PROCEDURE

4.1. Assessment

NOR shall assure that all the personal data,

- was collected legally, fairly and in a transparent manner,
- is limited to what is necessary and relevant to its purpose,
- is retained for a limited time only, according to its purpose,
- processed in a secured manner.

The assessment shall include the type of data that was gathered, and any unnecessary information shall be deleted.



4.2. Implementation

The collection of personal data in NOR shall be related for the purposes of recruiting, employment and for other purposes if it is performed,

- in a lawfully, fair, and transparent manner.
- Collected for a legitimate purpose.
- Adequate, accurate and limited to what is necessary.
- The personal data is kept no longer than is necessary.
- The information is processed in a secured manner.

In the event a data subject finishes its contractual relationship the information shall be held so long as it is reasonable and necessary according to the regulations.

4.3. Approval

An Internal GDPR Procedure shall be created with detailed information for the employees about the personal data that is stored at NOR and about their rights over the information. The HR manager shall assure that all the employees read and understand the mention procedure.

In the event the data subjects are not employees, e.g. during the recruiting process, they shall be presented with a privacy policy that informs the personal data that is processed, intended use, period of storage and their rights over the personal data.

4.4. Collection – Data Transfer

Collection and transfer of personal data shall be performed in a safe manner. Sensitive personal data is transferred through registered mail or secure connection / encrypted files if electronically transmitted. Methods include:

- Direct transfer through a VPN tunnel
- Encrypted files
- Encrypted cloud transfers, e.g. Dropbox.

4.5. Storage and Accesses

Personal data shall be stored in a secure manner. Sensitive data shall be categorized, when necessary pseudonymized, and stored in encrypted folders with restricted access. Only personnel with legitimate needs have access to the specific folders. Paper copies shall be digitalized and stored as indicated. In



the event paper copies are the only option, they shall be kept in sealed envelopes in a locked filing cabinet, behind locked doors. Only the HR manager and the Manager Director possesses the key. The data subjects may request access to their personal data at any time using the Internal GDPR Procedure indicated in Section 4.3 or via e-mail post@offshorerental.no.

4.6. Rectification and Erasure

The data subject may request the rectification of the information in the case of inaccuracy. The erasure of the data shall be performed when it is no longer needed or relevant, when the storage period expires or at the request of the data subject within the confines of applicable laws and regulations.

The data subject may request rectification or erasure to his/her personal data at any time using the Internal GDPR Procedure indicated in Section 4.3. or via e-mail post@offshorerental.no.

4.7. Response time

In the event the data subject requests access to the information, rectification or erasure, an answer shall be available within 30 days of the receipt of the request.

The period may be extended by two further months where necessary, considering the complexity and number of the requests. NOR shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

4.8. Breach of Security

In the event of a security breach the user and the authorities are notified within 24 hours of the detected breach. The company will take immediate measures to limit the damages of the breach as far as practicably possible. The data subject shall be notified in the event their information has been compromised due to a breach of security.

4.9. Data Processing Agreement

When a third party has access to personal data a Data Management Agreement shall be signed. The third party shall have in place the appropriate systems to comply with the regulations relating to personal data protection.



5. APPLICABLE LEGISLATION

[The Personal Data Act](#)

[General Data Protection Regulation \(GDPR\)](#)

