

# Privacy Notice

## 1. Introduction

Privacy and data protection laws protect the integrity and confidentiality of a person's private information. Vår Energi is committed to protecting the privacy rights of our employees, everyone we do business with and everyone that visit our website varenergi.no. We will only use personal data for appropriate purposes, and personal data will be processed in accordance with applicable data protection regulation.

## 2. Data Controller and Contact details

Vår Energi will be the "data controller" as defined in the Privacy Regulation ("GDPR") regard to the processing of personal data.

Vår Energi is obliged to ensure compliance with all applicable legislation related to data protection. If you have any questions or concerns regarding our processing of your personal information, please use the following channels to contact us:

Vår Energi ASA

Att. Data Protection Officer

PO BOX 101,

NO- 4068 Stavanger

Email: [data.protection.officer@varenergi.no](mailto:data.protection.officer@varenergi.no)

Telefon: +47 51 60 60 60

## 3. PURPOSE OF THE DECLARATION OF PRIVACY

The purpose of this statement is to keep you fully informed about how we collect and process your personal information. Please read this statement carefully so that you understand how and why we use your personal information.

## 4. Vår Energis processing of personal data

### 4.1. General

Vår Energi processes personal data about employees and external consultants working on Vår Energi's property and/or in Vår Energi's systems. Vår Energi also processes information about persons who are not employed or engaged by Vår Energi. The most important categories of personal data processed are described in section 5 below.

Vår Energi will always ensure proper, fair, and lawful processing of personal data, and will only use such information for expressly stated and legitimate purposes, in accordance with the law. Vår Energi will therefore only process personal data when such processing is necessary for us to be able to conduct our business, provide services or safeguard other legitimate business interests, fulfil legal requirements or agreements, or by consent (where the latter may be withdrawn at any time). Personal data will not be stored for longer than is necessary to carry out the purpose of the processing.

Vår Energi processes data about persons who are not employed or engaged by Vår Energi, and then with the following different purposes:

#### 4.2 Procurement and other business relations

Vår Energi processes personal data necessary for us to obtain goods and services from suppliers and contractors and for contract management. Information processed for such purposes includes contact information and personnel-related information. The legal basis is Vår Energi's legitimate interest in ensuring good management and support for our suppliers, partners, and customers.

#### 4.3. Background investigation

Vår Energi has established a background investigation process, Integrity Due Diligence (IDD). The IDD process consists mainly of checking our potential partners in a database called Compliance Catalyst, which collects publicly available information such as financial data, ownership structure, sanctions, or fines to the company or to the company's Board or managers.

#### 4.4. Communication

Vår Energi communicates externally and internally with the public, specific target groups and individuals. Examples of communication activities carried out by Vår Energi are the sending of newsletters, press releases and company reports, optimization of websites, organization of events, handling user-initiated dialogue, disclosure of information to public authorities, conducting investigations, and communication in social media. The personal data processed includes contact information and other communication-related information. The legal basis is legitimate interest in providing information and ensuring good management and support to our customers, suppliers and partners, or your consent.

#### 4.5. Recruitment and introduction of new employees

Vår Energi processes personal data for recruitment purposes to ensure the company's access to qualified candidates. The personal data processed includes contact information, recruitment, and personnel information. The legal basis on which Vår Energi is based for the processing of your personal data concerns processing necessary to fulfil an agreement or act at your request before entering into an agreement, or your consent to be in the CV database – SAP SuccessFactors.

#### 4.6. Safety and emergency preparedness

Vår Energi has implemented various security measures that involve the processing of personal data. These are security measures against unlawful or unauthorized access to buildings, rooms, systems, processes, and equipment. In Vår Energi's buildings and installations, activity logs can be carried out and camera surveillance can be carried out, control of vans and their drivers and access control for employees and visitors. The categories of personal data we collect, and use depend on the relevant safeguards. They include photos and videos, contact information and place of work, date, and time of access to buildings and information about vehicles. This is done in accordance with GDPR regulations for both processing and storing information.

Vår Energi's activities entail some risk. Sections § 9-2 and 9-3\* of the Petroleum Act set requirements for efficient and good preparedness and security. The purpose is to fulfil legal obligations in various jurisdictions regarding emergency preparedness. The legal basis for such processing of personal data is our legitimate interest in securing the business and any applicable legal requirements related to this.

#### 4.7. Website and cookies

Vår Energi website uses cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and allows us to improve our site.

varenergi.no uses [Google Analytics](#) to collect visitor statistics, including:

- How many users visit the site
- How much time they spend on the site
- Which websites users come from
- which browser is used

The user information is stored in aggregated form, which makes it impossible for us to follow individual users.

If you don't want to become part of Google Analytics user statistics, you can opt out using Google's [Ads Preferences Manager](#). There's also a browser extension that shuts down Analytics completely: [Google Analytics Opt-out Browser Add-on](#)

#### 5. Categories and collection of personal data

To make this privacy statement easier to understand, we have established the following categories. This does not mean or imply that our processing will always include all examples of personal data included in the categories.

- The categories of personal data that Vår Energi may collect and store about registered persons are:
- Contact information, such as name and address, phone number, email addresses, titles, etc.
- Recruitment information, such as applications, CVs, references, background checks, interviews and assessments, immigration and relocation information and graduation surveys, etc.
- Personnel information such as information about work experience and qualifications, date of birth, identification papers, driver's license, nationality, social security number, employee number, position, organization, bank account, next of kin, place of work, salary and manager, etc.
- Communication-related information, such as public policy relationships, positions, preferences regarding marketing and events (including allergies/dietary restrictions when provided by participants), and information related to user behavior in their own communication channels (including IP addresses) etc.

Personal data may be collected in several ways, including:

- directly by employees of Vår Energi when establishing a business relationship or through business activities.
- from a third-party service provider or agent, from a source of publicly available information (e.g., websites) or from an employer (e.g., where a supplier or contractor provides personal information about their employees);
- through the use of Our Energy's website; or
- information provided directly by you.

## 6. Transfer of personal data?

GDPR Chapter 5\* has specific rules for transfer of Personal Data abroad. The main rule is that Personal Data may only be transferred abroad if the laws of the country to which transfer is intended ensures an adequate level of protection of Personal Data. Transfer in this respect also includes cross-border electronic transfers, e.g., storage of Personal Data on servers or cloud solutions located abroad. Any onward transfer(s) of Personal Data that Vår Energi is the Controller of, e.g., by Data Processors, is also considered a transfer in this respect.

Countries within EU and EEA are considered to ensure an adequate level of protection and Personal Data may thus be transferred freely between the jurisdictions comprised thereby as long as the other requirements for processing of Personal Data are fulfilled (adequate processing basis, data processing agreements etc.).

## 7. How to exercise your rights as a data subject

National and international legislation on the processing of personal data gives rights to data subjects. Such data subjects have, in certain cases and depending on local law, the right to request access, rectification, deletion and/or restrictions in the processing of their data.

If you have any questions or would like to exercise your rights as a data subject, please contact the Data Protection Officer in Vår Energi (e-mail: [data.protection.officer@varenergi.no](mailto:data.protection.officer@varenergi.no)). You have the right to complain to the Norwegian Data Protection Authority if you believe that we have violated data protection legislation, but we encourage you to contact Vår Energi's Data Protection Officer before you submit such a complaint.

\*

We may change the Privacy Notice at any time. The effective date of each version of this notice is identified below.

\* Petroleumsloven §9-2 og 9-3

[Lov om petroleumsvirksomhet \[petroleumsloven\] - Lovdata](#)

\*GDPR Chapter 5

[Lov om behandling av personopplysninger \(personopplysningsloven\) - - Lovdata](#)