

DATA PROTECTION AND PRIVACY POLICY

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1. Introduction:

1.1. Purpose

CAM Industrial Services **Data Protection and Privacy Policy** refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

With the data protection and privacy policy, we strive to ensure the lawful processing of personal data and the appropriate level of data protection.

1.2. Scope

This policy refers to all parties (employees, job candidates, customers, suppliers, government clients and other stakeholders) who provide any amount of information to us.

Taking care of data protection is a part of CAM Industrial Services compliance activities and principles of responsible operations.

1.3. Applicability:

All employees of CAMs, subsidiaries and part time employees hired on contract must follow this policy. contractors, consultants, clients, partners, and any other external entity are also covered. Generally, this policy refers to anyone the company collaborate with or acts on our behalf and may need occasional access to data.

2. Definitions

(a) “Personal data”

refers to all kinds of information describing a person or his/her personal aspects that may be identified to concern him/her. Personal data is e.g. a person’s name, social security number, date of birth, address, telephone number, e-mail address, location data, picture, video, IP-address and cookie data, if the data can be connected to a person. Personal data is not considered to refer to

information that cannot be used to identify a person. Such information may be, for example, various statistics.

(b) “Sensitive data”

refers to data describing a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, sexual orientation, health, illness or disability or a criminal act, punishment or other consequence due to crime.

(c) “Data subject”

refers to a person whose data has been saved in the personal data register and whose data is being processed.

(d) “Processing of personal data”

refers to any operations which are performed on personal data, whether or not by automated means. Processing of personal data is the collection, recording, organising, structuring, storage, alteration, retrieval, use, transmission, disclosure, erasure or destruction of personal data.

(e) “Personal data register”

refers to any set of personal data collected for a specific purpose that is processed by automated means or is organised in paper format in such a way that the personal data is easily accessible without unreasonable costs. Separate notes do not usually form a personal data register, nor are a part of one. All data processed for the same purpose (e.g. customer relationship management) belong to the same register regardless of where and in which form they are stored.

(f) “Processor”

refers to a party that participates in the processing of personal data on an agency, subcontractor or cooperative relationship basis, and that processes personal data on behalf of and for the controller.

3. Policy elements

As part of the business, the company need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, financial data etc.

CAM collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

Our data will not be:

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organizations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically, we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted, or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

3.1. Actions

To exercise data protection and privacy, we're committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures

- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

Our data protection provisions will appear on our website.

3.2. Lawfulness, fairness and transparency

We will ensure that the processing of personal data is lawful, fair and transparent for the data subject. We will inform the data subjects i.a. of what personal data is collected from them, for what purpose, where the data is collected from and to whom the data is disclosed.

Personal data is never collected or processed without an appropriate legal basis. Legal bases for processing are i.a. the consent given by the data subject, CAM's legal obligations, the legitimate interests of CAM or the performance of a contract to which the data subject is a party.

3.3. Respecting the rights of the data subject

We will ensure that we inform data subjects appropriately and in a timely manner of the processing of their personal data and the data subjects' rights concerning the processing of personal data. The rights of the data subject include i.a. the right to inspect the data, the right to demand the rectification and/or deletion of data, the right to data portability and the right to restrict the processing of personal data.

The data subject has a right to inspect what data of him/her has been collected and stored in the personal data register of CAM. The data subject may also demand the rectification of incorrect data or the deletion of personal data regarding him/her.

In our operations, we will ensure that the rights of the data subjects will be taken care of and that the requests are responded to without delay.

3.4. Purpose limitation

We collect data only for specific purposes defined in advance and we do not use the data for other purposes. The intended purposes are defined when planning the collection of data and they are described in the privacy notices.

3.5. Retention periods and deletion of data

We store the data only for as long as it is necessary considering the purpose of the data processing. When the data no longer is necessary for the purpose, we delete or archive the data.

3.6. Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.