



INCENTRA SA – PRIVACY NOTICE

We care about your privacy. This Privacy Notice explains how we collect and use your personal data. Please read it carefully. If you have any questions about this Privacy Notice, or if you want to enforce your rights, please contact Incentra's Privacy Officer Laila Hansen at laila.hansen@incentra.no or +47 22424870.

This section provides a brief summary. In addition, you will find two separate sections, covering information on what we collect, and your rights. Incentra is a purchasing cooperation with an office in Oslo, Norway. If your personal data is collected offline, then whichever Incentra personnel collects it will be the controller of your personal data. Your personal data may also be shared between Incentra's personnel and members, and suppliers under contract with Incentra as necessary or appropriate.

The EU General Data Protection Regulation 2016/679/EU (GDPR) means information which is connected to a living individual who can be identified from that information, either by itself or when combined with other data likely to come into our possession. Personal data can include information collected by certain cookies or tracking technologies if it builds up a profile of you.

We collect and use personal data in order to carry out the relationship we have with our members and suppliers. Any other activities and processing which we carry out is to support this primary aim. Our purposes and lawful grounds for processing your personal data vary, depending on our relationship with you and on the activity in question. You can find out more information on this by in the page below 'What We Collect And How We Use It'. We will never sell your personal data.

We will only keep your personal data for as long as necessary to fulfil the purposes for which we collected and continue to process it, and to satisfy any legal, accounting or reporting requirements.

Where applicable we respect your data protection rights, including to request access, rectification, restriction, deletion or "porting" of your data, and to object to our use of your data. We do not make decisions about you based on electronic profiling. You also have the right to complain to the applicable data protection Supervisory Authority (see Your Rights), but please contact us first so that we can address your concerns.

Oslo, 24 May, 2018



What We Collect And How We Use It

BUSINESS CONTACTS

We process certain personal data about companies and individuals who are not a member or supplier, but with whom we would like to develop our business relationship.

What do we collect?

Types of data	Source
Identity Data: First and last name, title, company name, user name and password if you have access to our website limited areas	The organization which you work for Directly from you
Contact Information: Work address, and home address if appropriate and/or necessary, telephone numbers, email addresses, organization number, type of business	The organization which you work for Directly from you Public sources, such as information available from searching the internet or on business networking sites. Other parties in a relationship with Incentra
Interests and Engagement with Incentra Professional and personal interests, requests made in the past, interaction and engagement with the firm eg. attendance at events.	The organization which you work for Directly from you



YOUR RIGHTS

If you are based in the EEA you have a number of rights under the GDPR. These rights apply to any processing carried out by our group entities and offices in the EEA. Please see more information below on what we will require from you before we can respond to such requests.

Access to Information

The GDPR gives you the right to find out whether we are processing your personal data and, where that is the case, to receive a copy of the personal data we process and information on:

why we are processing it;

the categories of personal data we process about you;

the recipients or categories of recipient to whom the personal data has been or will be disclosed;

where possible, how long we plan to keep your personal data or the criteria we use to determine that period;

information on your rights under the GDPR;

information on where we received your personal data from if we did not receive it directly from you, and

if we transfer your personal data outside of the EEA, details of the appropriate safeguards we have used to protect your personal data and uphold your personal data protection rights.

The right to withdraw your consent to the processing of your personal data

If we process your personal data on the grounds of your consent, you have the right to withdraw your consent at any time. This will not affect the legality of our processing of your personal data up until the point at which you withdraw your consent. Please also note that we may still need to process your personal data on other grounds, for example to fulfil a contract with you or as required by law.

The right to object to processing of your personal data

You have the right to object to our processing of your personal data if we are using the lawful grounds 'legitimate interest' or that the processing is in the public interest. When we receive your objection we will assess our legal grounds for processing and will stop processing the personal data if we cannot demonstrate compelling legitimate grounds to continue processing the personal data.

The right to request the restriction of your personal data

You have the right to ask us to restrict our processing of (ie. stop using) your personal data if you think that it is inaccurate, that we are processing it illegally, or that we no longer need it for the purposes for which it was collected. While we consider your request we will stop processing your personal data within a reasonable time from the date we receive your request. We will notify you of our decision and any justifications for continuing to process your personal data as soon as we can.



The right to request amendment or erasure of your personal data

You have the right to request the amendment of your personal data at any time if it is inaccurate. If it is incomplete, you have the right to have the information completed, taking into account the purposes of processing. You also have the right to require us to delete your personal data as soon as possible where one of the following applies:

the personal data is no longer necessary for the purposes for which they were collected or otherwise processed;

you withdraw your consent to us processing your personal data and we have no other legal grounds for processing it;

the personal data has been unlawfully processed;

the personal data must be erased for compliance with a UK or EU legal obligation on us;

the personal data relates to a child under 16.

The right to personal data portability

You have the right to receive personal data which you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those personal data to another personal data controller, if we are processing it on the grounds that you have consented to that processing or because it was necessary in order to perform a contract with you, and if we have no other legal bases for processing it. This will not apply to most of our processing of your personal data, but we mention it for completeness.

The right to complain to the Supervisory Authority

If you feel that we have processed your personal data unfairly or unlawfully, you have the right to complain about us to the relevant Supervisory Authority, although please contact us first so that we can put things right.

In Norway the Supervisory Authority for personal data protection is Datatilsynet. You can access their website <https://www.datatilsynet.no>, where information is available in Norwegian and English.

How to exercise your rights

You can exercise your rights at any time by contacting our Privacy Officer, Laila Hansen at laila.hansen@incentra.no.

Please include in your email:

A clear statement on which rights you are seeking to enforce;

A full description of the information or type of information that you are writing about; and



This is so that we can keep your personal data secure and respond to you as quickly as possible. If you are asking for a large range of personal data we may ask you to be more specific, so that we can manage your request as quickly and efficiently as possible.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

Time limit to respond

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.