

PRIVACY POLICY FOR KVANTEL AS (v.7.0)

Processing of personal data in Kvantel AS

When using Kvantel's web portals, our website and / or contacting us to order our services or obtain information, Kvantel will process personal data about you. Below you will find information about personal data collected, why we do this, and your rights related to the processing of personal data.

Controller responsible for the personal data we are handling is Kvantel AS, represented by CEO Ole Jacob Moldestad.

Contact information for Kvantel AS is:

Address: Lilleakerveien 8, 0283 Oslo, Post box 124 Lilleaker, 0216 Oslo, Norway.

E-mail: security@kvantel.no

Telephone: 02235, dial 1 (international: +47 2190 2235, dial 1)

Organisation number: 994 481 924

For questions about our processing of your personal data, please contact Kvantel's Privacy Contact at the email address security@kvantel.no

1. Why do we collect personal data and what data do we collect?

We collect and use your personal data for various purposes, depending on who you are and how we come into contact with you. We collect the following personal data for the purposes stated here:

1. Personal data relating to your user in our web portal, as an employee of one of our customers or partners, in order to provide agreed services as well as to provide you with access to all operating information related to your company's services. For example, we use your name, mobile number, phone number, email address, IP address, in order to deliver services as agreed, as well as fulfilling operating and service agreements related to the services we are committed to provide your company or in order to invoice as per agreement.
2. Once registered as a user in the web portal, all activity you perform is documented on behalf of your company. That includes orders, comments submitted, or activity related to error handling through the ticket system. This is done in order to fulfil our agreed obligations to the company you act on behalf of.

Messages you send via the comment box, for example, for delivery, customer service or other comments (internal and external) are documented and traceable, in order for us to provide necessary and critical service according to agreement.

3. What technology you use, whether you are on laptop, tablet or mobile, which browser you use, IP address and when you last logged in is registered in the web portal which you log into. We do not store any history, only last login, if you choose not to use the "Forget Me" function.
4. Upon delivery of Voice Services, we collect additional information related to the delivery process as well as operation of your service portfolio with us. This is data that is prerequisite for us in order to deliver and operate the services you want. Typically, call data and phone number for billing purposes, and any other necessary supplementary information for delivery, which you as a customer provide in orders or order forms for these services.

ADDITIONAL APPLICABLE EXAMPLES MAY BE:

5. Sending out marketing, newsletters and provide information about our business and development: E-mail, name. The processing of personal data is based on an agreement with the company in which you are employed.
6. Answering incoming inquiries: Name, phone number, e-mail address and any personal data that may result from the inquiry. The processing of personal data is based on a balancing of interest. We have assessed that this is often necessary to us in order to help you with your question or to remedying errors or defects in our system.
7. When recruiting new positions at Kvantel AS: CVs, applications, certificates and references. Processing of personal data is based on consent you have given.
8. Cookies are used for access control and data is deleted when user logs out.

All processing of your personal data at Kvantel is made in order for us to fulfil the signed delivery agreement we are committed to towards the company you act on behalf of

As the designated contact person for the company you act on behalf of, we will use your contact information solely in connection with the company's customer relationship with Kvantel or for one or more of these purposes related to our customer relationship.

2. Distribution of personal information to others

We will not pass your personal data on to others unless there is a legal basis for such disclosure. Examples of such a basis will typically be an agreement with you when this is necessary in order to fulfil our obligations to supply and operate contractual services for your employer or client, or a legal basis requiring us to disclose the information.

Kvantel AS use only necessary subcontractors who have accepted to handle personal data in compliance with regulations in order to realize the services agreed with our customers. In cases where it is required to share personal data with these subcontractors in order to deliver and support the requested service(s), this will be done in accordance with applicable regulations.

Kvantel AS thus uses data processors to collect, store or otherwise process personal data on our behalf. In such cases, we have signed agreements to ensure information security at all stages of treatment. We currently use the following typical data processors:

- Operators, fiber and network owners, with availability where you want connection for your office or other services.
- Montage companies and installation companies, for local and central establishment of the services for you.
- Technicians, consultants and specialists in development, special adaptations, error correction or investigations necessary in delivery or troubleshooting processes for your services.
- Banking and billing services, to be able to bill correctly and in agreement with you.

All processing of personal data that we do take place within the EU / EEA. Exceptions may occur in cases where you as a customer order delivery of our services to a location outside of this area. Your company will by appointment and order enter contact person(s) for the provision and operation of

services, which we will proceed to our supplier with a locally present partner for the installation and operation of the onsite service.

3. Storage

We do not store personal data to a greater extent than is necessary to fulfil the purpose of the processing, unless required by law, for example through the Accounting Act. We have extensive procedures for deletion and anonymisation.

Personal data processed in order to fulfil an agreement with you or the company you are acting on behalf of are erased when the agreement is fulfilled and all obligations arising from the agreement has come to an end.

You may request removal of data from your user profile. When you are no longer employed by our customer, it is your employer who will notify us of terminating your access.

The main rule is that personal data are stored for a maximum of three years. How fast data is deleted may vary. Here are some key examples:

- For as long as your company is a customer with an active account of services, we will take care of your personal data, logins, messages and other information you enter.
- Information on usage patterns at TRACK can be active for up to three years after completion of customer relationships in our analytical systems. Data here is used to finding out if our services work in accordance with agreement, product development, and optimization of operations and services for existing customers.
- If you request that your user profile on TRACK be deleted or your employer retracts your access, personal data will be anonymized from your profile. We retain messages you have created and exchanged. This is to ensure good delivery and error correction history – so that any errors can be remedied faster. Recipient of messages you have sent will still keep their copy of the messages. We store your personal information with for us as long as necessary for the purpose for which the personal data was collected.

4. Your rights when we process personal data about you

You have the right to demand access, correction or deletion of personal data we process about you. You are further entitled to demand limited processing, make objections to the processing and claim the right to data portability. You can read more about the content of these rights on the Data Protection Agency website: www.datatilsynet.no.

To make use of your rights please contact us by e-mail security@kvantel.no. We will respond to your inquiry as soon as possible and no later than 30 days.

We will ask you to verify your identity or to provide additional information before we let you make use of your rights against us. We do this to ensure that we provide access to your personal data only to you – and not someone pretending to be you.

You may at any time withdraw your consent for the processing of personal data. The easiest way to do this is by contacting us at security@kvantel.no.

5. Complaints

If you believe that our processing of personal data is not in compliance with what we have described here or that we in some other way violate privacy laws, you may appeal to the Data Protection Agency.

For details about how to contact the Data Protection Agency, visit the Data Protection Agency's website: www.datatilsynet.no.

6. Changes

Should there be a change in our services or changes to the privacy regulations, this may result in a change in the information provided here.

We will continuously update Kvantel's Privacy Statement to reflect changes in systems and web portals or our Privacy Statement. For major changes, we will advise the next time you log in. In special cases, logged-in users will be notified directly by e-mail or notice on track.kvantel.no.

You and your company are responsible for notifying us of changes, whether related to new users or users who will no longer have access to TRACK. If your user has not been active for the past 3 months, you will still need to verify your data before logging in. This does not mean that we change the status of your user unless this is notified by the company you represent.

It is important that the data we have about you is correct. You can update your data on your web portal profile.

Otherwise, updated information is always readily available at our website.

7. Privacy contact

Kvantel has a responsible contact for privacy in order to ensure a safe processing of personal data. The arrangement is initiated by the Data Protection Agency. You may contact Kvantel's privacy contact on the e-mail address security@kvantel.no.