



Noova
Energy Systems

Noova Privacy Policy

2023



Noova Privacy Policy

Noova Energi System AS, org.nr. 918 710 558 ("Noova"), shall process personal data pursuant to the prevailing data protection legislation, including the Norwegian Personal Data Act (2018) that incorporates EUs General Data Protection Regulation 2016/679 (GDPR).

When you enter into agreements with us, visit our websites, contact customer service, log on to our customer portal or receive marketing from us, we will process personal data that can be linked to you as a person.

This privacy policy describes how we process your personal data and what rights you have pursuant to the prevailing data protection legislation.

Please contact us at post@noova.no if you have any questions to this privacy policy.

1. What is personal data and who is responsible for them?

Personal data means any information and assessments relating to an identified or identifiable natural person. This can be e.g. name, phone number, e-mail address or IP-address. Any collection, recording, organisation, storage, and disclosure etc. of personal data is called processing of personal data. All processing of personal data in Norway is subject to the Norwegian Personal Data Act (2018) that incorporates the GDPR, and the Norwegian supervisory authority, *Datatilsynet*, supervises the data protection legislation. The entity that determines the purposes and means of the processing of personal data, is called a data controller. The data controller is responsible for ensuring that the personal data is being processed pursuant to the applicable legislation.

Noova acts as the data controller for any processing of your personal data under this privacy policy. You can contact us at post@noova.no, or Postboks 182, 4339 Ålgård, Norway, or by calling us at 41 51 01 70.

2. When, why and what kind of data do we collect?

At Noova we wish to give you the best possible experience when using our services and when interacting with us. We collect and use personal data you provide us with, through using our services, and through visiting our website.

We also receive certain information from third parties that can be both public and private institutions. This is e.g. information about usage patterns from Hubspot and Google Analytics.

We collect and process this personal data to be able to fulfil contractual obligations with you (ref. GDPR art. 6(1) letter b), on the basis of your explicit consent (ref. GDPR art. 6(1) letter a), to uphold our legitimate interest in providing you with the best experience possible in relation to our website information and provided Services, and to uphold our legitimate interest in processing any legal claims (ref. GDPR art. 6(1) letter f), as well as for compliance with our legal obligations (ref. GDPR art. 6(1) letter c).

In general, we do not process any special categories of personal data about you, such as sexual orientation or health data.

Below we have listed all the specific ways to collect personal data from you and what categories of personal data we typically process, as well as the legal bases for such processing.

If you contact us, either by sending us an e-mail to our customer center, using the contact form on our website, using our chat solution on our website or calling us, you will provide us with information about yourself. Upon doing so, we collect the information provided by you, such as: name, e-mail address, phone number, company information as well as any other information that you choose to share with us.

We collect this information to be able to carry out our contract with you (ref. GDPR art. 6(1) letter b) or on the basis of our legitimate interest in replying to your requests or questions (ref. GDPR art. 6(1) letter f).

If you subscribe to our newsletter, we collect your name, e-mail address, phone number and company information. We process your personal data on the basis of our legitimate interest in following up our customers by providing relevant news and relevant information about our services (ref. GDPR art. 6(1) letter f, see also the Norwegian Marketing Act art. 15(3)). You may at any time reserve yourself against our marketing by contacting post@noova.no.

If you are not an existing customer or user, the legal basis for sending such e-mails would be your explicit consent (ref. GDPR art. 6(1) letter a). You may easily withdraw your consent by opting out of our newsletters by using the link included in our e-mails.

You are welcome to apply for a position with us, by sending us an e-mail at karriere@noova.no. During the recruitment process, we will process your personal data through provided CVs, application, certificates, notes from interviews, results from tests and information from your provided references.

We will process personal data about you to be able to enter into a potential employment contract with you (ref. GDPR art. 6(1) letter b). If we collect information about you through other sources than the references you have provided, we do this to uphold our legitimate interest in facilitating and administrating recruitment to our company, and ensuring we have the right candidate for the job (ref. GDPR art. 6(1) letter f).

When we enter a customer contract with the company you represent, we will also enter into a data processing agreement with the customer. We will process personal data about you, as the representative for your company, on the basis of our legitimate interest in entering into and fulfilling a contract with the company you represent (ref. GDPR art. 6(1) letter f).

3. Cookies

Cookies are small text files that are saved on your hard drive and associated to your browser, and that save information about how you use a webpage. The information is stored in your website browser, meaning with you. Cookies serve to make our web-services more user-friendly and efficient, including to provide you with a functional webpage and to give you the best possible experience of our websites.

We use necessary cookies to uphold our legitimate interest in providing you with a functional webpage (ref. GDPR art. 6(1) letter f). For all other cookies we ask for your explicit consent (ref. GDPR 6(1) letter a). The use of cookies is a standard function that is used by most websites. All modern browsers accept the use of cookies as a standard, but they give you the option to deactivate the use of cookies. However, please note that our website might not function as expected if you turn off the use of cookies. For more information on what cookies we use and how long they last, please see our cookie-banner.

4. Do we share personal data with third parties?

We will not share your personal data with others unless you either give us your consent to do so (ref. GDPR art. 6(1) letter a), or if we have legal basis to share your data, e.g. if it is necessary to provide you with a contractual service (ref. GDPR art. 6(1) letter b), if we are required by law to disclose your personal data (ref. GDPR art. 6(1) letter c), or it can be justified on the basis of our legitimate interest in doing so (ref. GDPR art. 6(1) letter f).

We use third party sub-contractors or service providers to collect, store or otherwise process personal data on our behalf ("sub-processors"). In these cases, we will enter agreements with the sub-processors to ensure information security at all stages of the processing.

We may use service providers or process personal data outside of the EU/EEA. This means that your personal data may be transferred outside of the EU/EEA. If that is the case, we will implement appropriate security measures in accordance with chapter five of the GDPR in order to sufficiently protect your personal data, including ensuring a legal basis for the transfer. Please contact us if you want to know the specific legal basis for a transfer.

A copy of the list of third parties used by Noova may be available upon request by emailing us at post@noova.no.

5. Your rights when we process your personal data

Below we have listed your rights when we process your personal data. To exercise your rights, please contact us by e-mail or phone, ref. our contact details in section 1. You may also change the personal data we have stored about you by logging on to "My Page" in the customer portal.

We will reply to your request as soon as we can, but no later than a month after the receipt of your enquiry.

- **Access:** You have a general right of access to the personal data we have registered about you.
- **Rectification and erasure:** You have a general right to request that we should rectify any incorrect personal data about you and erase personal data about you. Please note that personal data that is essential to the

customer relationship with us cannot be deleted, unless you also explicitly request termination of the customer relationship with us.

- **Restriction:** You have a general right to ask us to stop (“freeze”) the processing of your personal data, e.g. where you are of the opinion that we process personal data about you illegally and you do not wish us to erase these data pursuant to our routines for such erasure until the matter has been clarified.
- **Data portability:** You have a general right to request transfer of your personal data in a common, machine-readable format.
- **Objection:** You have a general right to object to our processing of personal data about you if this is justified by special circumstances on your part.
- **Right to appeal:** If you do not agree with the way in which we process your personal data, you may submit an appeal to the Norwegian Data Protection Authority (in Nw: Datatilsynet). We ask that you contact us beforehand, so that we may clarify any misunderstandings.
- **Withdraw your consent:** If our processing of personal data is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal

6. Information Security

We have implemented required technical and organisational measures to ensure a sufficient level of security when processing your personal data

We handle your information in a way that ensures the information is correct, available, and handled according to the degree of sensitivity of the data. Further, we make use of multiple security technologies and information security procedures to protect personal data from unauthorised access, use or dissemination. We will also carry out risk assessments for processing of personal data where necessary.

We have entered into data processing agreements with our data processors that process personal data on our behalf, where they undertake the same level of security as we have for our processing of personal data.

We limit access to personal data to the staff or third parties that will process personal data on our behalf. These parties are subject to confidentiality obligations.

We have established routines for handling information security breaches and routines (personal data breaches), and we will notify the supervisory authority (Datatilsynet) as soon as possible and no later than 72 hours after having become aware of a breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of the data subject. If the personal data breach is likely to result in a high risk to the rights and freedoms of a data subject, we will also notify the affected data subject.

7. How long do we store your personal data?

Your personal data will not be stored for longer than needed for the purposes mentioned in this privacy policy and our legal obligations.

8. Changes to this privacy policy

We may make changes to this privacy policy from time to time to reflect any changes to our website or our website policies. You will be notified if we make any significant changes to any of the services.

Last updated: March 13, 2023