



# PRIVACY POLICY

Privacy is the right to a privacy and the right to decide on your own personal information.

Personal information is information and assessments that can be linked to an individual.

MASCOT AS and MASCOT ELECTRONICS AS (hereinafter MASCOT) treat personal data as an employer, as a provider of services, for marketing purposes and in connection with visits to our website, [www.mascot.no](http://www.mascot.no).

Privacy is important in MASCOT's deliveries and we are committed to protecting the privacy, availability and confidentiality of personal information.

This Privacy Statement provides additional information about what personal data is collected, how the information is collected and protected, and what rights you have if your personal information is registered with us.

## What personal data processing is performed by MASCOT?

### Customer and supplier information

MASCOT processes personal information about customers and suppliers, as well as any third party required for the performance of contractual obligations.

The information being processed is contact information about customers and suppliers. Contact information means name of contact, email address, phone number and job title.

The legal basis for such treatment is the Personal Data Act section 8a, b or f (GDPR Article 6, letters b, c and f), and section 9a, b and f (GDPR Article 9, letters a and b). Personal data is stored in a separate database and deleted five years after completion of the customer relationship.

MASCOT will share personal information about customers and suppliers with MASCOT offices in other countries.

### Data processors

MASCOT can use processors. As a result of our services, we act as a data processor for many customers. We therefore base ourselves on general permission for use of other processors, cf. GDPR Article 28. This is agreed with the customer in our data processing agreement.

By using such processors we confirm that they are subject to the same obligations as regards the protection and use of personal data and other customer data such as for MASCOT.

Suppliers acting as processors for MASCOT should be able to document good internal privacy and information security practices through certifications, independent report auditing, or other relevant documentation. MASCOT can conduct security audits to ensure that the supplier processes personal data in accordance with the requirements of the GDPR.

An overview of processors used by MASCOT per. April 27, 2018 follows the table below. It is emphasized that which processor has been used depend on the services we provide, and therefore will vary from customer to customer.

Name	Type data handling	Type service	Location datacenter	Website
Markedspartner	Mgmt website	IT	Norway	www.markedspartner.no
Constant Contact	Emailing	e-mail	USA	www.constantcontact.com
Fasvo	Reg av prospects	Reg	Norway	www.fasvo.no
Bedr.helsetjenesten	Health info	Health	Norway	www.gronnjobb.no
Skill	Consultancy system support	IT	Norway	www.skill.no
Amesto	Production handling, accounting	IT	Norway	www.amesto.no
TQM	Quality mgmt (ISO)	IT	Norway	www.tqmpartner.no
KIVA (TI)	ISO certification		Norway	www.teknologisk.no
Microsoft	Storage company data	IT	Ireland	www.microsoft.no

### **Processing of personal data as part of human resources management**

MASCOT processes personal information as part of human resources management. Personal data processed in this regard include personal information, salary information, evaluations, information about relatives, and education / employment level.

The legal basis for this treatment is the fulfillment of the employment contract, cf. section 8 (a) and b (b) of the Personal Information Act, Article 6 (b) and (c).

Personal data relating to human resources management will be retained as long as they are employed by MASCOT and deleted 1.5 years after they have joined MASCOT.

### **Processing of personal information in connection with the marketing and use of MASCOT.no**

MASCOT processes personal information for marketing purposes. This personal information may be exchanged between MASCOT departments, but will not be disclosed to other businesses.

### **Newsletter**

It is possible to subscribe to newsletters, blogs and other subject matter from MASCOT. This is optional and means that you receive regular e-mail with the newsletters you have chosen to subscribe to. In order to send the newsletter to the correct person, it is necessary to register with your name and e-mail address, company name and job title, and by registering for one of our seminars we will also ask for your phone number.

This information is stored in a separate database and will not be passed on to others.

The legal basis for this treatment is section 8, first paragraph, of the Personal Information Act. You may at any time withdraw your consent for the retention of your contact details. MASCOT will delete your contact information from the mailing list of the current newsletter.

### **Requests via the website**

By using the form "Contact Us" on MASCOT.no, please provide your name and e-mail address. The information is stored in the webpage database, managed by MASCOT's web editor, and will not be disclosed to anyone outside of MASCOT. The information is deleted continuously from the database.

The legal basis for this processing is the Personal Information Act section 8a (GDPR Article 6 letter b).

### **Address Register**

MASCOT stores contact information to potential customers in their own database. The information is obtained from publicly available sources, such as the websites of companies. The purpose of this processing of personal data is to promote marketing for our services and coordinate this marketing effort.

The legal basis for this processing is the Personal Information Act Section 8, letter f (GDPR Article 6 letter f). MASCOT has a legitimate interest in marketing above potential customers. If you do not want to be part of MASCOT's address book, you may request to be deleted from this.

Personal data relating to potential customers will be deleted within one year after they were added to the database, provided that no customer relationship is established or consent for continued storage is given.

### **Web analytics and cookies (Cookies)**

On MASCOT's website <http://www.MASCOT.no>, we log information about all visitors using Google Analytics. The information logged is not linked to the visitor and can not be traced back to you as an individual. The information is collected in order to better understand how our users use the site, so we can optimize the pages optimally for you as a user.

Like most other web sites, we use a method where the information is stored in a cookie on your PC. Most browsers are set to accept cookies from websites. You can delete saved cookies by following the instructions for deleting in your browser. Information about this can be found in the help function of your browser. Please note that limiting access to cookies can affect the functionality of our site.

The visitors' IP address is normally not stored, with no exceptions:

- Application Error; Error log and IP address are created to investigate the error.
- If system login and tracking (EMS) is enabled.
- Actions and IP addresses for "Back-end users", such as web editor and administrators, are stored.

## **Google Analytics**

The cookies on our web pages are from Google Analytics (first-party cookie). It is set to be deleted automatically after 24 months if you do not return to the site. It is possible to reserve against all registration in Google Analytics by installing an add-on in the browser: Google Analytics Opt-out Browser Add-on

MASCOT uses the analytics tool Google Analytics to study traffic, usage patterns, and trends on the website. The data collected is used to optimize the user experience and customize the content of the website. Google's Google Analytics Guidelines do not collect personal information about users. The data collected is stored on Google servers. You can read more about how Google collects and protects data here.

# **Processing of Personal Information in our Service Areas**

## **Auditing services**

As an accountant, we are considered as a treatment officer. Processing of personal data in connection with MASCOT's audit services is provided for in Section 8 of the Personal Information Act (GDPR Article 6), cf. Chapter Five of the Auditors Act. In connection with audit services, personal information is processed such as employee appointments, social security numbers, salary details and tax cards. The collection and processing of personal data depends on what information we need to revise the accounts, perform a certification assignment or a management audit.

The information is collected from our customers, tax offices and Altinn.

According to section 5-5 of the auditor's act, the auditor shall keep documentation and numbered letters in accordance with this chapter in an orderly and satisfactory manner for at least 10 years. The same applies to correspondence related to counseling. As a general rule, MASCOT will delete the above documentation within one year after the storage obligation has expired.

In cases where MASCOT makes its own analyzes for purposes other than auditing, personal information will be anonymized or omitted completely. Such cases will always be agreed directly with the customer.

## **Accounting Services**

MASCOT carries out all or part of the accounts for customers. Personal data processed in this regard are, for example, name, personal identification number and payroll and drawing information. The information is obtained from the customer and in some cases third parties such as Altinn.

In these assignments MASCOT will be a data processor and, consequently, enter into a data processing agreement with the customer as a treatment manager. The Data Processing Agreement will set the framework for MASCOT's processing of personal data. The specific security measures and the deadline for processing will be stated in each computer agreement.

In cases where MASCOT makes separate analyzes for purposes other than accounting services, personal information will be anonymized or omitted completely. Such cases will always be agreed directly with the customer.

## **Processing of personal information related to jobseekers**

When registering and / or subscribing to vacancies at MASCOT, as well as submitting CV, application and other relevant documents in connection with a job application, personal information will be collected. Personal data processed in connection with recruitment include personnel and job and education details. In some cases, the personality test of relevant candidates is conducted, and MASCOT is handling these results related to the tests. Personal information is obtained from jobseekers.

In cases where MASCOT uses a recruitment service provider, the processing will be bound by a data processing agreement. The information will not be used for purposes other than processing related to job search.

Personal data about job seekers will be deleted one year after they applied for a job at MASCOT, unless the employee is employed or agrees to keep the information longer. It is emphasized that jobseekers can get the information deleted whenever they wish.

## **Information Security**

We are committed to information security and have implemented procedures to ensure confidentiality and integrity in our customer's data. MASCOT has security mechanisms that involve both organizational and technical measures such as role and access management and privacy requirements in our IT systems. Material containing sensitive personal information or social security number and transferred to or from MASCOT must always be secured against access by means of encryption.

Extended information about information security in MASCOT is available to our customers on request.

## **Your rights**

MASCOT's processing of personal data is governed by the Personal Information Act and its corresponding regulations. Your rights relating to our processing of personal data are included in the Personal Information Act, Chapters III and IV (GDPR Chapter III). Below are some of the most important rights presented:

### **Right of access**

Anyone requesting it is entitled to know what processing of personal data MASCOT is doing, as well as basic information about these treatments. Such information is provided in this privacy statement. Only in cases where MASCOT is the treatment manager, we can manage the requirements for access. In cases where MASCOT is a data processor, requests for access must be directed to the healthcare professional. As a data processor, we can not provide personal information to the data subject without the client being informed and approving the access.

If you are registered in MASCOT's systems, you are required to know what information about you is registered and what security measures are available during the treatment as long as such insight does not impair safety.

You may require the healthcare professional to expand the information as mentioned above to the extent that this is necessary in order to be able to take care of your own interests.

## **Right to correct and delete**

If MASCOT treats personal information about you who is inaccurate, incomplete or unauthorized, you may, within the limits set out in the Personal Data Act and other laws, require the correcting or erasure of personal data. Furthermore, you may require deletion if processing of personal information is no longer necessary to fulfill the purpose for which they were collected or if the treatment is based on your consent and you withdraw it. The treatment will be required if required by law. For example, you may not require that personal data included in the mission documentation to auditors and accountants be corrected or deleted, cf. section 5-5 of the auditors act, the auditors' regulations chapter 5 and the bookkeeping act section 13. In the case of corrections and deletion on assignments where MASCOT is data processor, as a general rule, the registered person should contact the treatment manager directly.

MASCOT shall respond to requests for access or other rights pursuant to sections 18, 22, 25, 27 and 28 of the Personal Information Act (GDPR Articles 15, 16, 17 and 20) without undue delay, and no later than 30 days from the date of receipt of the inquiry. Unless special circumstances make it impossible to respond to the request within this deadline. In this case, MASCOT will provide a preliminary response with information about the reason for the delay and the probable time when responses can be given.

## **Data Protection Officer**

MASCOT has its own privacy representative who assists with guidance so that personal information is treated in a good way and in accordance with the regulations.

The Ombudsman is a voluntary scheme and is administered by the Data Inspectorate. Requests for access, rectification and deletion, as well as reports of nonconformity, are handled by the privacy representative.

## **Contact**

We make sure that our customers use their permanent contact in MASCOT for questions regarding MASCOT's processing of personal information, and these will involve others in the organization as needed.

Requests for access, rectification and deletion, and non-response messages, should be addressed to [personal.protection@MASCOT.no](mailto:personal.protection@MASCOT.no) or to MASCOT AS v / Ombudsman, PO Box 177, 1601 Fredrikstad. General requests for privacy from non-MASCOT customers should also be addressed to the privacy representative.

## **Changes to the Privacy Statement**

There may be changes to our privacy statement. Date of last change is 27.04.2018. We encourage interested parties to regularly review our website for changes.