

## PRIVACY POLICY

### 1. Introduction

Welcome to the Sunnmøre International Business Network's privacy policy ("**Privacy Policy**").

The Sunnmøre International Business Network's ("**SIBN**") respects your privacy and is committed to protecting your personal data. This Privacy Policy informs you how we, collect, process and look after your personal data when you visit our Site sign up for membership, sign up to our newsletter or register for events.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we refer to below when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

### 2. Who we are

SIBN is a organisation registered in Norway with registered company number 928 934 233. SCC is the controller and responsible for your personal data.

Our appointed data privacy manager who is responsible for overseeing questions in relation to this privacy policy is:

Emma Blake

Email address: [emma@konnexus.no](mailto:emma@konnexus.no)

Please contact us on the details above if you have any questions regarding our use of your personal data.

You have the right at any time to contact the Norwegian Information Commissioner's Office (Datatilsynet), who is the Norwegian regulator for data protection issues ([www.datatilsynet.no](http://www.datatilsynet.no)). We would, however, like to resolve any issues or concerns you may have before you approach the Datatilsynet so please contact us first.

### 3. Changes to the privacy policy and your duty to inform us of changes

We keep this Privacy Policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 4. Third-party links

Our Site may also include links to third-party websites, plug-ins and applications. You understand that by clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their use of your personal data. You will need to read the privacy policy for the third-party website.

## 5. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data is not considered as personal data as it will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the number of users accessing specific website features. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any special categories of **Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, you may not be able to register for some of events or seminars.

## 6. How is your personal data collected?

We use different methods to collect data from and about you including:

- **Direct interactions.** You may give us your Identity Data, Contact Data by filling in forms or by corresponding with us. This includes personal data you provide when you:
  - create an account on our website;
  - register for an event
  - become a member
  - subscribe to our service or publications;
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:
  - (a) analytics providers such as Google;
  - (b) advertising networks; and
  - (c) search information providers.
- Identity Data and Contact Data from publicly available sources such as Brønnøysundregistrene and the electoral register in Norway.

## 7. How we use your personal data

We will only use your personal data in the following circumstances:

- Where we need to set up a membership
- Where we need to confirm your attendance at a seminar or an event.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and / or
- Where we need to comply with a legal obligation.

We will get your consent before sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by contacting us.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Type of data	Basis for processing
To register you as a member	(a) Identity (b) Contact	Entering into a contract with you as a member of SIBN.

<p>To enable you to register for events and seminars.</p>	<p>(a) Identity (b) Contact (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests</p>
<p>To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members interest in events and seminars)</p>
<p>To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of our advertising</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study what our members are interested in, which seminars and events to organise and how to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website and member relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate inter, to keep our website updated and relevant, to develop our organisation and to inform our marketing strategy</p>
<p>To make suggestions and recommendations to you about events, programmes or opportunities that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our network and grow our organisation)</p>

## **8. Marketing**

We aim to provide you with choices regarding certain personal data uses, particularly around marketing of our events and other opportunities.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think may be of interest to you.

You may receive marketing communications from us if you have requested information from us and you have not opted out of receiving marketing information.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of registering as a member.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy below.

## **9. Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **10. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above:

External Third Parties as described below.

- Third parties to whom we may choose to sell, transfer or merge parts of our organisation or our assets. If a change happens to our organisation, then the new owners may use your personal data in the same way as set out in this privacy policy.

For the purposes of this data policy External Third Parties include:

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Revenue & Customs, regulators and other authorities.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **11. International transfers**

We do not transfer your personal data outside of the EEA.

## **12. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **13. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In order to comply with local taxation and anti-money laundering laws, we have to keep basic information about our customers (including Contact Data and Identity Data) for six years after they cease being customers.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 14. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on these grounds. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee to cover our costs in copying the data and sending it to you, if your request is, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could 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.

## **15. Cookie Policy:**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a better experience when you use our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Our website uses the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.



Other third parties who may use cookies may include, for example, advertising networks and providers of external services like web traffic analysis services. These third-party cookies are likely to be analytical cookies or performance cookies or targeting cookies.

We do not share the information collected by the cookies with any third parties.

You can choose which analytical, functionality and targeting cookies we can set by going into your browser and clicking on the button(s):

Strictly essential cookies **OFF**

Analytical or performance cookies **OFF**

Functionality cookies **OFF**

Targeting cookies **OFF**

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.