
Privacy and Data Protection Policy

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1 PURPOSE

This privacy statement describes how Tinfos AS and Tinfos' subsidiaries (>50% ownership) collect and use personal data. The goal is to provide you with general information about our processing of such information.

2 WHEN DOES TINFOS COLLECT PERSONAL DATA?

We mainly process information that you have provided to us for one of these reasons:

- You are employed by us
- You're hired by us.
- You have applied for a job at Tinfos
- You are a private electricity customer
- You are a private electricity grid customer
- You are employed by a corporate customer of ours
- You are employed by, or representing, an investor/buyer of small power plants
- You are employed by a supplier of hours, services and/or materials to us
- You as landowner, catchment right owner and/or reservoir regulation owner are in the process of entering into, or have already entered into an agreement with us
- You have contacted us by phone, email or facebook/website

We also receive information indirectly for the following reasons:

- An employee has designated you as the next of kin
- A job seeker has specified you as a reference
- You have visited our website
- You have ownership interests in Tinfos AS or in our subsidiaries
- You are on the board of Tinfos AS or in our subsidiaries

3 YOUR RIGHTS UNDER THE DATA PROTECTION LAW

If you want to contact us regarding your own personal data, you can send an e-mail to post@tinfos.no. You are entitled to an answer without undue delay, and no later than 30 days.

- You can ask for a copy of all the information we process about you
- You can ask us to correct or supplement information that is incorrect or misleading
- In certain situations, you can ask us to delete information about yourself
- In some situations, you may ask us to restrict the processing of information about you
- You can object to our processing of information about you

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- If we process information about you on the basis of consent or a contract, you can ask us to transfer information about you to you or to another data controller.

If you believe that we do not comply with the rules of data protection legislation, we hope that you notify us. You can also complain about our processing of personal data to the Norwegian Data Protection Authority (Nw.: Datatilsynet).

4 REGISTRATION OF DATA USING OUR WEBSITE

When you visit our website www.tinfos.no tools that we can use to analyze your and other visitors' use of the website are used. The purpose of such an analysis will be to compile statistics that we can use to improve and further develop our websites. The statistics can provide a basis for looking at how many people visit different pages, how long, which websites users come from and which browsers are used.

Cookies are small temporary files that are stored on your device when you visit a website (which uses this). The files will be deleted automatically after a certain period of time or when the website is closed. Cookies contain information such as your settings or profile information for a website.

We use cookies to keep statistics about user activity on the website. The purpose of such a statistic is to improve and further develop our websites.

5 REGISTRATION OF DATA WHEN YOU CONTACT US

5.1 Message from contact field on web page

When you send us a message from the contact field from our website, we will register your name and email address together with the information you give us when filling in the contact field. We do this in order to process your request in accordance with your expectations.

5.2 Email

When you send us an email, your email address and the time you sent the email, along with the information you provide to us in the email, will be registered. This is done so that we can process your inquiry in an expected manner.

The email will usually be made available on the recipient's various platforms (PC, phones, tablets). Your inquiry may be distributed to some of our employees internally for further processing and handling.

All incoming emails are scanned and checked for virus and malware.

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5.3 Telephone

When you call us, the phone number you are calling from, and the time of the call are recorded. This registration is mainly done on the individual Tinfos employee's mobile phone. There is no systematic registration of phone calls where the caller can be identified beyond this, but it may happen that the name, email address, telephone number and employer are registered by the individual employee in the address register shared on other platforms such as PC, tablet etc. This is to make further contact with you easier.

5.4 Visitors to our premises

When you visit our power plant Tinfos 1 we will register your name and, if applicable, where you are employed as well as the time you arrive and when you leave our premises.

6 CUSTOMER INFORMATION

6.1 Customers and investors

In order to enter into necessary agreements and manage sales and due diligence processes, we collect and process personal data about the customer's contact persons and representatives. This can be your name, job title, address, email and telephone number.

6.2 Private electricity and/or grid customer

In order to manage the customer relationship, perform measurement, clearing and invoicing and carry out technical operations and customer support in accordance with applicable agreements, rules and laws, we collect and process necessary personal data about you as a customer. This is contact information such as address, telephone number and email. We also record necessary identification information such as name, national identity number, customer number, organization ID number, contact persons, bank account number, meter number, measurement point ID, facility number and IP address.

6.3 Enterprise electricity and/or grid customer

In order to manage the customer relationship, make measurement, clearing and invoicing and carry out technical operations and customer support in accordance with agreements, rules and laws, we collect and process the necessary personal data about the customer contact persons. These are information such as telephone number and email address as well as necessary identification information such as name, position and social security number.

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7 INFORMATION ABOUT CONTRACTING PARTIES

7.1 Landowners and catchment rights owners

In order to enter into necessary agreements and manage processes related to agreements on the development of power plants and catchment rights, we collect and process contact and identification information about our contracting parties. This can be contact information such as phone number, address and email. We also register the necessary identification information such as national identity number, property references (gnr/bnr) and bank account number for the purpose of identifying all necessary contract objects to the correct contracting party and to fulfil obligations related to the agreements.

In some cases, information about the economy of contracting parties will be collected and processed.

Personal data contained in the agreements will be distributed to the other contracting parties.

7.2 Partners

In order to enter into necessary agreements and manage processes related to the agreements, we collect, and process contact and identification information about our partners. This can be contact information such as phone number, address and email. We also register the necessary identification information such as national identity number and bank account number.

In some cases, we collect necessary information about our partners' employees as a basis for further invoicing of services performed. This usually involves names, telephone numbers, e-mail addresses and time sheets that include travel time, working hours and location specifications.

8 INFORMATION ABOUT VENDORS

8.1 Vendor representatives and contact persons

Tinfos processes personal data about contact persons and employees of our suppliers contact information; email address and telephone number and identification information such as name and position.

8.2 Employees of our suppliers on site

If you are employed by a supplier of materials and/or services that have an assignment at one of our construction sites, your employer is required to register your name and time when you are staying at the construction site for health and safety reasons. Tinfos AS has access to these registers on request.

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9 INFORMATION ABOUT JOB SEEKERS, EMPLOYEES, BOARD MEMBERS, OWNERS AND NEXT OF KIN

9.1 Job seekers

We ask you who want to apply for a job at Tinfos to send us information about name, education, work experience and reference persons etc. (CV). Job seekers will often provide additional personal data they consider relevant to the assessment of the application, for example on contact information, family circumstances and interests. In interviews, we ask questions to determine whether the job seeker fits the position. In some cases, we may use tests or question forms for this purpose. If it becomes relevant to hire the job seeker, we may ask for further information as well as for documentation for information we have already received. It is voluntary to provide us with information.

We do not use the information for anything other than to assess the application for work. We do not provide the information to anyone else. We have procedures for erasing your personal data.

9.2 Employees

Tinfos processes information about employees in order to manage wages and working conditions related to employment agreements such as name, address, national identity number, salary level and position.

Necessary information is recorded for the payment of salary such as time registration, tax percentage, tax municipality, bank account number, employee number, union affiliation and sick leave.

In connection with the subscription of insurance under the employment agreement, necessary personal data is processed and transmitted to the insurance broker such as contact information, car number, national identity and social security number, disability and health information.

In connection with the payment of travel compensation, user ID, time of travel, accommodations, time consumption, logins and name of the approver of the expense report are registered.

The company records personal data in connection with internal control and nonconformity reporting. This may include name, address, email, user ID, role and the user's description of nonconformities that may contain personal data or personal circumstances, name of the processor of nonconformities and name of the approver of nonconformities.

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Tinfos records telephone usage for telephones covered by the company in connection with the processing and control of invoices from the telephone service provider, and for at an overall level make decisions related to assessments regarding phone usage/data usage and customized subscription service.

As an employee of Tinfos, you will gain password-protected user access to your company's data network, as well as to software you need to perform your duties and tasks. In this connection, names, emails, telephone numbers and employee numbers are usually registered. User history and login history are registered with our IT service provider and/or with the provider of specific software that processes personal data on behalf of the company (data processors).

The company records the time of planned vacation development for the individual employee.

All former and current employees have a personnel folder in our archive system. Here, among other things, job applications and employment agreements are kept/archived, as well as other agreements entered into and copies of correspondence and documentation relevant to the employment relationship.

Processing of data is essentially legal obligations. Some of the treatment is also based on a balancing of interests. We need to document that we have fulfilled obligations under law and agreement after they have been fulfilled. We also need human resources documentation to be used for future human resources. These are legitimate interests. It is not possible to access the information in any other way than to store the information. Treatment is therefore necessary. Our employees have an ongoing contractual relationship with us. The personal data we process is linked to this contractual relationship. It is largely a matter of information that employees have given us. The information relates to matters that an employer treats. We believe that the legitimate interest takes precedence over the employee's interests.

9.3 Relatives of the company's employees

Tinfos archives contact information and the names of next of kin of Tinfos employees. The purpose is to be able to contact next of kin in situations where information between the company and next of kin is required.

9.4 Members of the Board

Tinfos archives personal information such as name, address, email, account number, telephone number and national identity number for directors of the board, to carry out board calls and sending board documentation to board members.

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9.5 Shareholders with ownership in Tinfos AS or in Tinfos' subsidiaries

Tinfos archives personal information such as name, address, email, account number, national identity number, ownership interest for the execution of summonses, sending information and transferring dividends to shareholders. In addition, we transfer information for taxation to the tax authorities in accordance with Norwegian law.

10 INFORMATION ABOUT CONTRACTING PARTIES AND PARTNERS

Processing of sensitive personal data requires a basis for processing in addition to those mentioned in section 6.

Sensitive personal data are: information about racial or ethnic origin, political opinion, religion, conviction or trade union membership, as well as genetic and biometric information for the purpose of unambiguously identifying a natural person, health information or information about a natural person's sexual relationship or sexual orientation.

If we are to process such information, we shall ensure that we have a basis for processing. For our employees, information about health and union membership will be particularly relevant. Health includes, for example, illness and injuries and absence justified in this. A particularly relevant basis for processing will be that treatment is necessary in the capacity of the employer, for example when following up and reporting to public authorities or in the event of facilitation of the employment relationship.

The processing of information about criminal offences and offences etc. is subject to special rules that we shall familiarize ourselves with if we are to process such information.

11 INFORMATION ABOUT EMPLOYEES, DIRECTORS AND OWNERS

Tinfos shall provide statutory information to the data subjects. Tinfos provides such information in a privacy statement. All data subjects shall have access to the information concerning them. We provide information to employees in an internal privacy instruction as part of the personnel manual in Tinfos AS in addition to the instructions Privacy and Data Protection Policy in Tinfos AS (This document).

The information in the Privacy Policy includes, among other things, the name of the company and contact information, the purpose of the processing, the categories of personal data, recipients of personal data (if it is disclosed), information about any disclosure of personal data to other countries, how long the personal data will be stored, the data subjects' right to demand access, rectification or demand the removal of the personal data, how the business accessed the personal data and the opportunity to lodge a complaint with the Norwegian Data Protection Authority.

Special measures in relation to providing good information must be considered where the registered person is a child. Under normal circumstances, this will not be applicable in Tinfos.

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12 DATA SUBJECTS' RIGHTS

We will respond to inquiries from data subjects in connection with matters related to privacy data without undue delay.

Administration and Human Resources Manager at Tinfos, Øyvind Odden, is responsible for processing your inquiry regarding personal data with us.