

StrongPoint Privacy Notice

- Whistleblower Channel

- 1. Introduction and description of processing** StrongPoint is committed to protecting the privacy and security of your personal information.
- This privacy statement describes how we collect, process and use personal information in relation to Whistleblower cases, in accordance with the General Data Protection Regulation (GDPR).

2. Data controller, data protection officer

StrongPoint ASA (reg.no. 982769221) with subsidiaries ("StrongPoint", "we" or "us") is the controller of personal data processing. This means that StrongPoint is responsible to ensure processing is compliant with applicable laws in relation to personal data.

3. Categories of personal data

The following information will be processed when requested information from us:

- Contact information: e-mail, name, company, country and your message to us.
- Browsing Information
- Business unit

4. The purpose and lawful basis for the processing

StrongPoint is processing the personal data you provide to us or that is a result of your use of the webpage as described below:

Purpose of processing:

To fulfill your request and act on whistleblower information. Share and receive information or materials from us.

Lawful basis for processing:

Consent and legal obligation.

Retention period:

We may retain your personal information for 10 years, or as long as it is required by law.

5. Who do we share your personal data with?

Service Providers and Subcontractors: Your personal data will be processed by our service providers and/or subcontractors (including but not limited to data storage service providers, legal advisors) on instruction from StrongPoint. All service providers and subcontractors act as StrongPoint personal data processors and are under contractual arrangements only allowed to process data for the purposes as set out above. Furthermore, the personal data processor (service provider or subcontractor) and those acting under instructions of the processor will not access more personal data than is required for the performance of the service covered by the agreement with StrongPoint.

StrongPoint Group: Your personal data may be processed by companies within the StrongPoint Group that provide services to StrongPoint in relation to your request such as investigation, support and administration. In such case, StrongPoint Group companies act as StrongPoint personal data processor or joint controller with StrongPoint. The personal data processor or joint controller may only process personal data in accordance with the purposes or instructions provided by StrongPoint for the processing. Furthermore, the personal data processor (StrongPoint Group company) and those acting under instructions of the processor will not access more personal data than is required for the performance of the service covered by the agreement with StrongPoint.

Government agencies: StrongPoint may share your personal data with government agencies (such as the police, the tax authority or other authorities) if we are required by law to do so, needed as part of an whistleblower investigation, or if you have agreed that we do so. We may also share your personal data with government agencies when we believe in good faith that it is necessary to protect our rights, protect your security or the safety of others, investigate crimes, or respond to a government request. Government agencies that receive your personal data will be the data controller for such processing, which means that it is not StrongPoint who governs how your personal data, if

shared with an authority, is processed. Thus, if your personal data is shared with authorities, this Privacy Notice will not cover that processing.

Other third parties: StrongPoint will not sell, trade or in other ways forward your personal data to third parties outside the StrongPoint Group unless you have given a separate consent.

6. Where we are processing your personal data

StrongPoint Group companies: We may share your personal data to our subsidiaries or affiliated companies for the purpose of that the relevant subsidiary or affiliated company will process your personal data to respond to your request or inquiry. By submitting the request form you consent to our transfer of your personal data to our subsidiaries or affiliated companies that may be established in a country outside the EU/EEA (i.e. a so-called third country), including countries which the EU Commission does not consider to have an adequate level of protection for personal data. Please be aware that countries which are outside the EU/EEA may not offer the same level of data protection as the EU/EEA and, thus, you may not have the same rights as under the laws applicable to us.

We may transfer your personal data to our subsidiaries or affiliated companies established in any of the countries (including so-called third countries) listed on a web page that you can access by clicking on the globe icon in the upper right-hand corner of the StrongPoint website.

Third party service providers: The personal data that we collect from you may be transferred to and processed by a third party service provider established in a country outside the EU/EEA (i.e. a so-called third country), including countries which the EU Commission does not consider to have an adequate level of protection for personal data. In such case we will take all necessary steps required under applicable law in order for such transfer of your personal data across borders to be compliant with applicable law. We will only transfer your personal data to a country outside the EU/EEA where; (i) the EU Commission

has decided that the third country ensures an adequate level of protection, or (ii) where the transfer is being safeguarded by the use of EU model clauses (under Article 46.2 in the General Data Protection Regulation (2016/679) ("GDPR")).

We may transfer your personal data to third party service providers established in the following countries outside the EU/EEA: The United Kingdom, USA and India. You can find further information about the rules on data transfers outside the EU/EEA, including the mechanisms that we rely upon, on the European Commission website which you can visit by clicking [here](#).

7. How we protect your data

StrongPoint takes appropriate technical and organizational measures to protect your personal data and StrongPoint is constantly working to protect your personal data from accidental or unlawful destruction, loss or alteration, unauthorized disclosure of or unauthorized access to the personal data transferred, stored or otherwise processed by StrongPoint.

8. Your rights

We respect your integrity and your rights under legislation related to the processing of personal data. The rights you have mean that you can request a copy of the personal data we process about you, you can request incorrect information about you to be corrected and even under certain conditions you can request erasure of information. You may also in some cases have the right to object to StrongPoint' processing of your personal data and to exercise your right to data portability.

9. Changes to this Privacy Notice

We reserve the right to change this Privacy Notice. If we make any changes to this Privacy Notice, we will update of the Privacy Notice online or in another appropriate manner inform you of the updated version.

10. Complaints and Contact information

If you have any questions regarding the processing of your personal data, this Privacy Policy or otherwise have comments on StrongPoint' processing of your personal data, please contact us on:

StrongPoint ASA

Att: Data Protection Officer/Chief People and Organization Officer

Brynsengveien 10,

0667 Oslo

Norway

E-mail: kono@StrongPoint.com

You also always have the right to lodge complaints to your Data Protection Authority if you have objections in relation to our processing of your personal data.

Status:	Date:	By:
Revised and Updated	16.09.2022	DPO
Revised and Updated	12.12.2023	DPO

