

PRIVACY POLICY

iTUB AS, Tverrvegen 37, 6020 Ålesund, Norway, iTUB Danmark ApS, Tarp Byvej 6D, 6715 Esbjerg N, Denmark, and iTUB ehf., Gunnarsbraut 12, 620 Dalvík, Iceland (jointly referred to as "**iTUB**"), are committed to maintaining the accuracy, confidentiality and security of your personal data. This Privacy Policy describes the personal data that iTUB collects from or about you, and how iTUB uses and to whom we disclose that data.

This Privacy Policy applies to the personal data iTUB collects and processes about iTUB's customers, vendors, representatives and employees of customers and vendors, as well as iTUB's other business partners (jointly referred to as "**business contacts**"). This Privacy Policy also applies to iTUB's processing of the personal data of job applicants. These data subjects, as applicable, are also referred to as "**you**" in this Privacy Policy.

The terms "**iTUB**" and the "**Company**" refer to iTUB AS, iTUB Danmark ApS and iTUB ehf., as applicable, and all references in this Privacy Policy to "**we**", "**us**", "**our**" and like terms should be interpreted accordingly.

If you are unsure of how this Privacy Policy applies to you, please contact the relevant iTUB entity for more information using the contact information set out below in Section 12.

1. Purpose and compliance with law

It is iTUB's policy to comply with applicable data protection legislation. This Privacy Policy is based on the General Data Protection Regulation 2016/679 ("**GDPR**"). In addition, each iTUB entity may be subject to additional requirements when it comes to processing of personal data, depending on national legislation.

2. Personal data collected and processed by iTUB

The personal data collected and processed by iTUB regarding our business contacts is mainly contact data, for example name, address, e-mail, telephone number, job title as well as correspondence on sales and service opportunities and/or projects between our business contacts and employees of iTUB.

When applying for a position with us, we may process your contact data, education and training data, data regarding your work experience and previous employers, CV and other data you elect to provide to us. For short-listed applicants, we may process your references and recommendations and minutes from job interviews.

As a general rule, iTUB collects personal data directly from you. Data regarding references and recommendations of job applicants are however likely to be collected from the references listed in your application. In most circumstances where personal data about you is obtained from a third party, we will notify you.

3. Why do we collect and on what ground do we use your personal data?

The purpose of processing the personal data of business contacts is first and foremost so that we can contact you, either to request your service or provide you our services. The data can also be used to issue our invoices to you, or to the entity you represent.

The processing is thus in most instances necessary for iTUB to fulfil its contractual requirements with you, or the entity you represent.

We may also contact you in order to market iTUB's products and services. If you are a customer of iTUB, we base the processing of your contact data for marketing purposes on our legitimate interest of maintaining a close relationship with our customers and sending

you information about our products and services. If you are not a customer of iTUB, we may ask for your consent in order to send you marketing material.

You can always withdraw your consent or opt out of receiving marketing material from us via the unsubscribe link provided in all marketing e-mails we send. Opt-outs and withdrawals of consent may also be communicated via e-mail.

Providing personal data to us is in most instances voluntary. However, if you fail to provide sufficient data, iTUB may be unable to fulfil its duties in accordance with your contract with us.

The purpose of processing the personal data of job applicants is to evaluate you for an employment opportunity within iTUB. This processing is necessary in order to take steps at your request prior to entering into an employment contract. The personal data we collect about your references is based on our legitimate interest of contacting these individuals for evaluation purposes. If you provide us with personal data that contains sensitive data, such as information relating to race, disability or other health related data, you expressly authorize iTUB to process such data.

Some data is necessary for us to be able to evaluate your job application, while providing other personal data is voluntary. If you fail to provide the necessary data, we may be unable to consider your job application.

Finally, iTUB may also carry out other processing activities based on applicable legislation.

iTUB undertakes to process your data lawfully, fairly and in a transparent matter. The data will only be collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. The processing will in all events be adequate, relevant and limited to what is necessary.

If any data is processed on the grounds of your consent to the processing you may, at any time withdraw your consent. This might however mean that iTUB will not be able to provide you with the applicable service or will not be able to maintain a business relationship with you or the company you represent.

4. When do we disclose your personal data?

We may share your personal data with our employees, contractors, consultants and other third parties who require such data to assist us with fulfilling our duties to you or the company you represent. In addition, we may share your data with other entities within the iTUB group.

Access to your personal data may also be provided to third parties which provide iTUB with information technology and data processing services as part of iTUB's operation of business. In addition, personal data may be disclosed or transferred to another party in the event of a change in ownership of iTUB.

Further, your personal data may be disclosed as permitted or required by applicable law or regulations or to comply with valid legal processes such as search warrants, subpoenas or court orders.

Personal data is only transferred by us to countries outside the EEA if such transfer is permitted under applicable privacy legislation.

5. How is your personal data protected?

iTUB endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal data in question. These safeguards are designed to protect your personal data from loss and unauthorized access, copying, use, modification or disclosure.

6. Retention of your personal data

Except as otherwise permitted or required by applicable law or regulations, iTUB endeavours to retain your personal data only for as long as we believe is necessary to fulfil the purposes for which the personal data was collected. This means that iTUB deletes your personal data when such data is no longer necessary.

As a general rule, we delete personal data of our business contacts after 2 years from the end of our business relationship. If you are a representative of iTUB's customer, vendor or other business partner and you leave your job for that party, iTUB will delete all data on you, as far as possible with reference to iTUB's legitimate interests, once we receive confirmation that you no longer work for that party.

Job applications are stored for 6 months. After that time the application and all data relating to it will be securely deleted, unless you consent to a longer retention time. You may at any time withdraw your application.

If you become an employee of iTUB as a result of the recruitment process, the data we collect in connection with your application may be incorporated into our human resources system and may be used to manage the new-hire process and any such data may become part of your employee file and used for other employment-related purposes.

7. Updating your personal data and the right to rectification

It is important that personal data in our records is both accurate and current. If your personal data happens to change during the course of your relationship with iTUB, please keep us informed of such changes.

You are entitled to request rectification of inaccurate data on you. Taking into account the purpose of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Please direct any updates to the relevant iTUB entity using the contact information set out below in Section 12.

8. Access to your personal data

You are entitled to request access to the personal data we process on you and information on the processing. You may also be entitled to a copy of the personal data undergoing processing. Where you have provided us with your personal data which we process based on your consent or our contract with you, you may have the right to receive such data in a machine-readable format and to have the data transferred to a third party.

9. Right to erasure, restriction and objection to processing

Under certain circumstances you may have the right to request us to erase personal data concerning you with undue delay, such as where the personal data is no longer necessary in relation to the purpose for which they were collected or otherwise processed or if you withdraw your consent and where there is no other legal ground for the processing.

You may also have the right to obtain from us the restriction of processing, where certain requirements are fulfilled, such as if the processing is unlawful and you prefer the restriction of data processing instead of erasure of the data or if we do not longer need the personal data for the purpose of the processing but the data is required by you for the establishment, exercise or defence of a legal claim.

In the event iTUB processes your data based on its legitimate interests, for direct marketing purposes or for the purposes of scientific/historical research and statistics you furthermore have the right to object to such processing.

Please direct any request to delete, restrict or object to the processing of your personal data to relevant iTUB entity, using the contact information set out below in Section 12, who can also provide you with further information on your rights in this respect.

10. Rights regarding automated decision making

iTUB does not make any decisions about you based solely on automated processing, including profiling, in relation to your data. If such solely automated decision making will be implemented, iTUB will provide you with information about the logic involved as well as the significance and the envisaged consequences of such processing.

11. Inquiries or concerns

All requests in relation to the rights described above shall be directed to the relevant iTUB entity, whose contact information is made available under Section 12 of this Privacy Policy.

Please note that your rights relating to your personal data are not all absolute. In the event that we cannot approve your request in relation to your personal data, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

If your request is approved, the necessary action will be taken on your request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. However, we will always inform you of the reason for such a delay within a month of receipt of the request. Rejections of requests will also be acted on within these timelines. If you have any questions about this Privacy Policy or how we manage your personal data, please contact iTUB by telephone, in writing or by e-mail. We will endeavour to respond to your questions and advise you on your rights based on this Privacy Policy.

If you are not satisfied with our response, you are entitled to make a written submission to the data protection authority in your country or the Data Protection Authority in Iceland (www.personuvernd.is), as applicable, or lodge a claim before the relevant courts.

12. Contact Information

The contact details for iTUB AS are as follows:

iTUB AS
itub@itub.no
Tverrvegen 37
6020 Ålesund
Norway
Tel: (+47) 71 40 19 00

The contact details for iTUB Danmark ApS are as follows:

iTUB Danmark ApS
itub@itub.no
Tarp Byvej 6D
6715 Esbjerg N
Denmark
Tel: (+45) 76 13 13 58

The contact details for iTUB ehf. are as follows:

iTUB ehf.
itub@itub.is
Gunnarsbraut 12
620 Dalvík

Iceland
Tel: (+354) 460 5044

14. Revisions to this Privacy Policy

iTUB may from time to time make changes to this Privacy Policy to reflect changes in our legal or regulatory obligations or in the manner in which we deal with your personal data. We will communicate any revised version of this Privacy Policy. Any changes to this Privacy Policy will be effective from the time they are communicated.