



Norwegian Oil and Gas Association (NOROG)

# **EPIM ID Privacy Policy**

*Deprecated version*

Contents

- 1 Introduction ..... 3
- 2 Which personal data do we collect? ..... 3
- 3 How do we process your personal data? ..... 4
- 4 Do we share your personal data? ..... 5
- 5 Transfer of personal data to third countries ..... 5
- 6 Do we retain your personal data? ..... 5
- 7 Subcontractors ..... 5

Deprecated version

## 1 Introduction

This document describes how we handle your personal data within the EPIM ID service based on you being a User of the service.

Privacy principles that are common to all NOROG Services offerings, which therefore also applies to this Service, are described in the General Privacy Policy available at [www.epim.no/privacy](http://www.epim.no/privacy).

Words in this document with capitalized initial have their definition stated in the definition and abbreviations section in either the General terms or the EPIM ID Special terms, both available on [www.epim.no/terms](http://www.epim.no/terms).

## 2 Which personal data do we collect?

We collect personal information in connection with EPIM ID sign-up process, and your subsequent use of your EPIM ID account when you interact with Services integrated with EPIM ID. Below a description of the categories of personal data we collect.

### Account information

When you create an EPIM ID account and do updates to your EPIM ID account via [www.epim-id.no](http://www.epim-id.no) you actively provide information about yourself. This information includes:

- Name
- Organisation (employer)
- Personal company e-mail address
- Mobile number (optional)
- Office phone number (optional)
- Account status
- Unique non-sensitive reference to the 3<sup>rd</sup> party authentication solution you desire to use to prove your identity for recurring use of your EPIM ID account, e.g. Norwegian Bank ID.

If your organisation has implemented an automatic integration towards EPIM ID (federation), your personal information will be automatically provided by your User organisation, and you will not be able to modify your EPIM ID profile data yourself. Please contact your organisation and request updates to your user information when/if required.

### Data collected when you use your EPIM ID account

- **In data exchange between you and the 3<sup>rd</sup> party authentication provider**

Part of the sign-up process and for recurring log-in to your account EPIM ID use trusted 3<sup>rd</sup> Parties to confirm your identity, e.g. Norwegian Bank ID.

The authentication process with trusted 3<sup>rd</sup> Parties is handled as a secure data exchange directly between you and that Identity provider. EPIM ID will only receive the result of the Authentication that does not include sensitive information, but typically only your name and the result of the Authentication attempt (success/failure).

- **Information about the use of your EPIM ID account towards integrated services**  
We register information about login and logout on your EPIM ID account. We also register limited information about which NOROG services you access using your EPIM ID account as log-in method.
- **Technical information about your device and internet connection**  
We use server logs and other tools to record technical information about your device, connection to our Services and cross-device usage. This information typically includes operating systems, web browser versions, IP addresses and session-based authentication cookies, and unique identifiers.
- **Cookies and other technologies that store data locally on your device**  
When you use NOROG services that make use of EPIM ID for log-in purposes, we use different technologies to recognize you as a User and provide a seamless access to the services. For example, we use cookies, so you do not have to log in again every time you visit an application using EPIM ID.

### 3 How do we process your personal data?

The personal data we collect are processed as a part of:

#### **Account sign-up process**

for us to be able to support secure establishment of your personal EPIM ID account.

#### **Recurring log-ins**

where EPIM ID will use your personal data as part of authentication requests we receive from application services using EPIM ID for authentication purposes.

#### **Managing security by**

- verifying your identity part of sign-up process and recurring use of your EPIM ID
- automatic monitoring of your EPIM ID account activities to help you and your User organisation to prevent abuse of your EPIM ID account and following access to Services using EPIM ID as part of their log-in process.

#### **Service improvement**

where we may aggregate and analyse and improve the performance of the EPIM ID service, but where your data is anonymized in advance.

#### **Providing you support and guidance, including to:**

- Provide you efficient support via service desks
- Help diagnose problems reported by you to the service desk
- Inform you about possible compatibility issues with your end-user equipment, e.g. the browser type you use.
- Sending you important information, e.g. in case of service unavailability, or important information about new features and/or functionality.

#### **For our and your employer (User organisation) legitimate interests, including to:**

- Deliver EPIM ID in compliance with requirements between NOROG and your company as available on [www.epim.no/terms](http://www.epim.no/terms).
- Performing our obligations set forth by applicable law and regulatory authorities
- Ask you to on regular basis reconfirm your need for an EPIM ID account to support your User organisations leavers processes to ensure EPIM ID accounts no longer needed are closed down as soon as possible.

## 4 Do we share your personal data?

Except as described in the Agreement or above, personal data will not be transferred or provided to any third parties.

## 5 Transfer of personal data to third countries

Except as described in the Agreement or above, personal data will not be transferred or accessed from outside EU/EEC.

## 6 Do we retain your personal data?

We keep your EPIM ID account data, including change history, for as long as your account is active. If your account is deleted either by an EPIM ID administrator in your company or by yourself using the “Delete me” functionality available from your personal EPIM ID profile available at [www.epim-id.no](http://www.epim-id.no), your EPIM ID account will be immediately deleted.

Other types of personal data collected as described in section 2, including backups of such, are kept for up to 12 months. This is to assure that EPIM ID can:

- Provide support to applications using EPIM ID for authentication purposes, e.g. part of investigations concerning possible misuse of application access.
- Support investigations concerning unlawful acts where EPIM ID accounts are deliberately or mistakenly deleted by parties other than the account holder or an EPIM ID administrator in your organisation.
- Support controlled phase out of your account when deleted.

Each application using EPIM ID for authentication will typically also store logs of your user activities. For details about logging done by each EPIM ID integrated application please refer to that application’s privacy policy.

## 7 Subcontractors

Below the list of Contractors and subcontractors which conduct processing of personal data on behalf of NOROG as part of delivery of the Service.

Name	Tasks/deliverables	Within EU/EEC (Y/N)	Basis for transfer (N/A, PC, SCC, AD) <sup>1</sup>
ATEA AS	<ul style="list-style-type: none"><li>• Application Management</li><li>• Application Development</li></ul>	Y	N/A
Signicat AS	<ul style="list-style-type: none"><li>• Provider of 3<sup>rd</sup> party eID integrations in use in EPIM ID</li><li>• Integration of BuyPass Code service</li></ul>	Y	N/A
Basefarm AS	<ul style="list-style-type: none"><li>• Provider of hosting of services and core systems for Signicat AS.</li></ul>	Y	N/A
OmnitechIT Security AS	<ul style="list-style-type: none"><li>• Application Development as subcontractor to ATEA AS</li></ul>	Y	N/A

<sup>1</sup> N/A = Not applicable, PC = Privacy Shield, SCC = Standard Contractual Clauses, AD = Adequacy Decision

BuyPass AS	<ul style="list-style-type: none"><li>• Provider of BuyPass Code being a mobile app providing multi factor authentication of Users without Norwegian Bank ID or other EPIM ID supported 3<sup>rd</sup> Party eID.</li></ul>	Y	N/A
Cegal AS	<ul style="list-style-type: none"><li>• NOROG's Platform as a Service (PaaS) provider</li></ul>	Y	N/A
IBM AS	<ul style="list-style-type: none"><li>• Provider of basis software</li><li>• Provides software specialist support</li></ul>	N	SCC
Micro Focus AS	<ul style="list-style-type: none"><li>• Provider of basis software</li><li>• Provides software specialist support</li></ul>	Y	N/A

Deprecated version