

Surplus Marketplace Privacy Policy

Version: March 2019

Contents

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

Deprecated version

1 Introduction

This document describes our handling of personal data, within the *Surplus Marketplace* service for you as a User of the service. Privacy principles common to all EPIM Services, which therefore also applies to this service, are described in the EPIM Privacy Policy available at www.epim.no/privacy.

2 Which personal data do we collect?

Account information

As a User of *Surplus Marketplace*, you will typically get access to electronic sales portals where you user application account containing following information about you:

- Name
- Organisation
- Email
- Phone number

Data collected when you use Surplus Marketplace

The electronic sales portals involved when using the Surplus Marketplace service will store certain user activity information, such as by whom and when objects (documents, folders etc) were created, updated, moved, deleted, downloaded and distributed.

Group and role membership information

Privileged staff at the service provider manage your access to the service. Such assignments and changes to your roles and access groups are stored. This is due to strict requirements that the service shall support transparency about who can access what, including history.

Data you provide us directly

When you communicate with us, contact our customer support teams or respond to a survey, you will provide information to us.

3 How do we process your personal data?

The personal data collected as described in previous section is processed as follows:

To provide you support and guidance, including to:

- Providing you efficient EPIM Service support via service desks
- Help diagnose problems reported by you to the service desk
- Inform you about possible compatibility issues with the browser you use
- Improve your web experience
- Sending you important information, e.g. in case of service unavailability

Manage security in EPIM Services by

- Verifying your identity when logging into the electronic sales portals as part of the log-in process
- Monitor your log-in activities and account modifications to help you detect and prevent fraud and abuse of the EPIM Services.

Service improvement

- Aggregation to analyse and improve the performance of the service, but where data is then anonymized.

For our and User organisation's legitimate interests, including to:

- Be in compliance with requirements between EPIM and your company as available on www.epim.no/terms.

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?

When you no longer have a need or legal right to have a user account you should contact user support and request relevant *Surplus Marketplace* application user account to be deleted. User activity information and necessary elements of account information will be retained due to integrity requirements in *Surplus Marketplace*.

7 Subcontractors

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

Name	Tasks/deliverables	Within EU/EEC (Y/N)	Basis for transfer (N/A, PC, SCC, AD) ¹
Integrated Cooperative Solutions AS	<ul style="list-style-type: none">• Application Management• Application Development• Provider of the sales portal• Servicedesk towards users of the Service	Y	N/A
Headit AS	<ul style="list-style-type: none">• Application Development related to the Assetfront application	Y	N/A
Vendo AS	<ul style="list-style-type: none">• Software as a Service (SaaS) provider of web sales portal	Y	N/A
Amazon Web Services EMEA SARL	<ul style="list-style-type: none">• Cloud service platform for Assetfront application.	Y	N/A

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