

Privacy and Data Protection in Comrod

1. Introduction

This privacy policy explains how Comrod Communications AS and its affiliates listed in section 12 below (collectively “Comrod” and “we”) collect and process personal data. Each Comrod company, represented by their respective CEO, is regarded as a 'controller' in terms of its processing of personal data and thus responsible for processing personal data in accordance with this policy and applicable data protection law. This policy includes information which a controller is required to provide you as a data subject when personal data is collected and further processed as well as information on how Comrod processes and handles personal data in general.

Privacy and data protection laws, including the General Data Protection Regulation¹ (GDPR), protect the integrity and confidentiality of a person's private information. Comrod is committed to protecting the privacy rights of our employees and everyone with whom we do business. We restrict our use of personal data to appropriate purposes, and the data will be processed in accordance with applicable data protection regulation.

2. Comrod's processing of personal data

Comrod will always process personal data fairly and lawfully, and only for a specified, explicit and legitimate purpose.

2.1. Collection of personal data

The categories of personal data Comrod may collect and process include:

- contact information such as name and address, telephone numbers and email address;
- HR related details about an individual's work experience and qualifications, date of birth, driver's licence details; passports, entry-visas, etc.
- IDD and screening-related information (see section 2.6); and
- business details, including the names of relevant office holders of a company and business numbers.

Comrod collects personal data in a number of ways, including:

- directly by Comrod staff when establishing a business relationship or through other operational relations;
- From another business entity within the Comrod Group
- from a third party service provider or agent, from a source of publicly available information (e.g. websites) or from an employer (e.g. where a supplier or contractor provides personal data about their employees); or
- from use of Comrod's website (see section 5)

2.2. Employees and Consultants

Comrod processes personal data about our employees and external consultants working from Comrod premises or in Comrod's systems. The purpose of this processing is general HR management, including recruitment and IT-administration. The processing is based on legal obligations, the

¹ REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

legitimate interests of Comrod in managing its employees or consultants or the processing is necessary for the performance of an agreement between the employee or consultant and Comrod.

2.3. Customer Data and Procurement Related Matters

Comrod also processes personal data about data subjects who are representing our business partners. We process personal data necessary in order to support and manage business-related activities such as support and managing of customer relations, provision of products and services, procedures relating to after sales services etc., business transactions and procurement of goods and services from suppliers and contractors. The legal basis for processing of these data is the legitimate interests and commitments of Comrod in managing its contractual relations, maintaining and supporting its customers and other business relations. The processing may also be based on consent from the data subject. Some information may also be retrieved from publicly available sources.

2.4. Contact with Comrod

Comrod may collect and hold personal data about data subjects who contact us for various reasons, such as media, investor or customer relations. The personal data will normally relate to contact information and the legal basis for processing may be consent or that our legitimate interest to meet your request and improve our business and services are not overridden by your rights to data protection.

2.5. Security data

Comrod may process personal data in relation to security management, including (CCTV) recordings, IT system activity logs and registers for access to Comrod properties. The legal basis for processing these data may be legal obligations or Comrod's legitimate interests in maintaining secure premises, facilities, services, equipment and information.

2.6. Ethics and compliance policies

Comrod has established a Code of Conduct as well as Comrod internal compliance policies, which involve Integrity Due Diligence (IDD) and screening processes, which includes collecting information to help Comrod understand who our relations and counterparties are and how they conduct their business. In some instances, the IDD may also include the processing of personal data.

Additionally, the Code of conduct includes whistleblowing procedures. In relation to the Code of Conduct and compliance policies, we have set up a reporting procedure where employees, associates and external third parties interacting with Comrod can report suspected or potential breaches of law or company policies. This reporting may involve processing of personal data. The legal basis for processing mentioned under this section may be legal obligations, the legitimate interests of Comrod in conducting its operations in a prudent manner and in compliance with local and international regulation and the legitimate interests of enabling all employees of Comrod, business partners and other stakeholders to report their concerns or offenses in a confidential manner.

3. Security of data processing

Comrod will ensure appropriate technical and organisational information security related to confidentiality, integrity and availability of personal data within our systems. Access control measures ensures that access to personal data within physical files and IT-systems is restricted to dedicated persons.

Comrod shall ensure that all adequate steps and corrective actions are taken to rectify identified breaches of the security that are identified. As long as the personal data breach is likely to result in a high risk to the rights and freedoms of the Individual, Comrod shall, if required under applicable law, notify the affected individual of a breach without undue delay following discovery of such breach.

4. Minimisation and deletion of personal data

Comrod has implemented internal control systems, which shall ensure that we only collect personal data necessary for the purpose it is collected, and that we retain Personal Data only for the period that is required to serve the legitimate purpose mentioned above.

5. Cookies and analytic tools

Comrod use Google Analytics in order to analyse traffic on this website. This system collects information on anonymised IP-addresses of visitors. The purpose of the analysis is to gather information on how the website is being utilised by our visitors in order to optimise the information provided and enhance user experience. For more information on anonymization of IP addresses in Google Analytics, please refer to <https://support.google.com/analytics/answer/2763052?hl=en>.

6. Transfer of personal data to third parties

Third party service providers may process personal data on behalf of Comrod within various areas of our activities. These may be different IT- solution service providers, Security service providers etc. Comrod will implement adequate safeguards in accordance with applicable law to protect your personal data processed by third party service providers. We will enter into appropriate Data Processing Agreements with each processor in accordance with applicable law.

We will only share personal data with the service providers to the extent it is necessary for them to provide the relevant services to or on behalf of Comrod.

Comrod will ensure that the European rules on trans-border data flows are complied with if or when personal data are transferred to external processors (outside of the Comrod group) located outside of EU/EEA or located in a country that is not recognised by the EU Commission as ensuring an adequate level of protection.

Personal data may also be transferred to the authorities in countries Comrod operate, in accordance with applicable law.

7. Transfer of personal data within the Comrod Group and to third parties

For any data processing within the Comrod Group, Comrod will establish Internal Data Processing Agreements, guidelines and policies in order to ensure compliance with the GDPR and applicable national law and establish uniform procedures for processing personal data.

If transfer of personal data to a Comrod business entity or third party located outside the EU/EEA is required, Comrod will ensure that the relevant party signs the EU approved Standard Contractual Clauses for transfer of personal data to third countries.

8. Privacy Statements of third parties

This Privacy Policy addresses Comrod's processing of personal data. This policy does not address or govern the personal data processing practices adopted by third parties on third party websites or in relation to third party services that may be accessible through use of this website.

Although we try only to link to websites that share our high standards for privacy protection, we are not responsible for the content or the privacy practices employed by third party websites or third party services. We encourage you to familiarize yourself with the privacy policies applicable to such websites or services prior to providing them with your personal data.

9. How to exercise your rights as a data subject

National and international data protection law, including the GDPR, establish certain rights of data subjects. As a data subject, you have a right to information about Comrod's processing of your personal data and, upon your request, to receive a copy of the personal data being registered and processed. We will require that you confirm your identity before submitting the registered data. This will confirm that we submit the data to the correct person.

You may require that inaccurate data are rectified and, under certain circumstances, request that we erase registered personal data or that the processing is restricted.

You may also have a right to object to the processing, including if the processing is for direct marketing purposes.

Where processing of your data is based on your consent, you may withdraw your consent at any time. We will delete such data unless we have another legal basis for retaining and processing it.

If you have questions or want to exercise your rights as a data subject, please contact Comrod at info@comrod.com. You may also use the contact information for each Comrod group entity provided in section 12 below).

10. Complaints

You have a right to file a complaint to Comrod regarding compliance with this policy or violations of your rights under applicable data protection law. The complaint may be filed to info@comrod.com. If the complaint is rejected, you will receive the reasons for Comrod's rejection.

Although we encourage you to first follow the complaints procedure to Comrod described above, you may also file complaints to the local Data Protection Authorities or the courts:

- i. in the EEA country at the origin of the personal data transfer, against the Comrod company in such country of origin responsible for the relevant transfer;
- ii. in Norway, against Comrod Communications AS; or
- iii. in the EEA country where you live or have your place of work, against the Comrod group company being the controller of the relevant personal data.

11. Governing law and jurisdiction

This website is governed in accordance with Norwegian legislation, and the Stavanger District Court shall be the legal venue with exclusive jurisdiction over any dispute arising from your use of this website.

12. Contact information for the Comrod Group

To exercise your rights as a data subject or to receive more information regarding our privacy practice, please contact one of the following Comrod entities:

Comrod Communication AS

Fiskaavegen 1, 4120 Tau, NORWAY
Tel.: +47 5174 0500 / Fax: +47 5174 0501
E-mail: post@comrod.com

Comrod AS

Fiskaavegen 1, 4120 Tau,
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Tel.: +47 5174 0500 / Fax: +47 5174 0501
E-mail: sales@comrod.com

Comrod France SAS

600 Chemin des Hamaïdes, BP 10119,
59732 Saint Amand Les Eaux, FRANCE
Tel.: +33 32722 8550 / Fax: +33 32722 8555
E-mail: sales@comrod.fr

Comrod Sweden AB

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Tel.: +46 70 216 1122
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909 Canterbury Road, Suite A, Westlake,
Ohio 44145, USA
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