

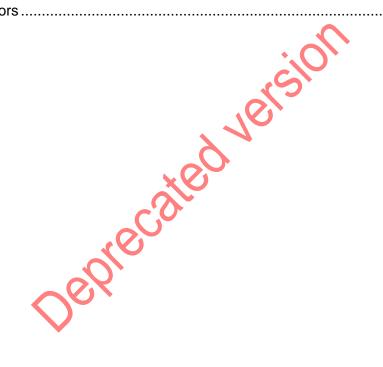
Collabor8
Subsurface
Privacy Policy

Document: Collabor8 Subsurface - Privacy Policy Version: September 2022



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#### 1 Introduction

This document describes how Offshore Norge ("we") handle your personal data within the Collabor8 Subsurface service (hereafter called Subsurface) based on you being a User of the service.

Privacy principles that are common to all Collabor8 Services offerings, which therefore also applies to this Service, are described in the General Privacy Policy available at <a href="https://www.collabor8.no/privacy-terms">www.collabor8.no/privacy-terms</a>.

Words in this document with capitalized initial have their definition stated in the definition and abbreviations section in either the General terms or the Subsurface Special terms, both available on <a href="https://www.collabor8.no/terms-of-services">www.collabor8.no/terms-of-services</a>.

### 2 Which personal data do we collect?

#### **Account information**

As a User of Subsurface, you will have a Subsurface user account containing following information about you:

- Name
- Organisation (employer)
- Fmail
- Account status

#### Data collected when you use Subsurface

The integrity of data uploaded to Subsurface is important, and Subsurface will therefore 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

Administrative users in your organization will 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 support via service desks
- Help diagnose problems reported by you to the service desk
- o Inform you about possible compability issues with the browser you use
- o Improve your web experience

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o Sending you important information, e.g. in case of service unavailability

#### Manage security in Offshore Norge Services by

- Verifying your identity using Hello 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 your application service account(s).

#### 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 Offshore Norge and your company as available on www.collabor8.no/terms-of-services.

# 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 the European Economic Area (EEA).

## 6 Do we retain your personal date?

When you no longer have a need or legal right to have a user account, the user account is closed by an administrative user in your company. User activity information and necessary elements of account information will be retained due to integrity requirements in Subsurface.

### 7 Subcontractors

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

Name	Tasks/deliverables	Within EEA (Y/N)	Basis for transfer (N/A, SCC, AD) <sup>1</sup>
Bouvet Norge AS	<ul><li>Application Management</li><li>Application Development</li></ul>	Y	N/A
CEGAL AS	<ul><li>Platform as a Service (PaaS) provider</li><li>Monitoring</li></ul>	Y	N/A
TIETOEVRY NORWAY AS	1 <sup>st</sup> Line user support	Y	N/A
Microsoft Ireland Operations Limited	API Gateway and security products	Y	N/A

<sup>&</sup>lt;sup>1</sup> N/A = Not applicable, SCC = Standard Contractual Clauses, AD = Adequacy Decision