SNF's privacy statement and cookie policy

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(Last revised on 12 Feb. 2019)

This privacy statement applies to the Centre for Applied Research (SNF) and describes what data we collect and how we use them. It is our aim to give you transparent information about our processing and your rights.

1. DATA CONTROLLER

SNF (org. no 984 005 776) is the data controller for the company's processing of personal data. The Personal Data Act defines the 'data controller' as the party that decides the purpose of the processing of personal data and what tools are to be used. The data controller is responsible for ensuring that personal data processing takes place in accordance with the regulations. You are welcome to contact us if you have any questions about the processing. Our contact information is available at the end of this statement.

2. MORE DETAILS ABOUT THE PROCESSING

'Personal data' means any information relating to an identified or identifiable natural person, while 'processing' means any operation of set of operations performed on personal data, whether or not by automated means.

2.1 Our research

SNF conducts project and programme-based research funded by external grants in the form of assignments or as contributions to research initiated by SNF. SNF and NHH usually have some joint research projects.

The research conducted at SNF is based on different types of quantitative and qualitative data, both available data and data collected by SNF, such as register and survey data, interview data, field observations, documents, data from historical archives etc. The use of data material that contains personal data is regulated by the Personal Data Act.

A complete overview of the personal data that are being processed and the grounds for processing are available for each individual research project and stored in the Norwegian Centre for Research Data's (NSD) message archive. See www.nsd.no

SNF's object is to produce high-quality research results. The purpose of the processing of personal data is stated in each specific project.

Personal data are normally not disclosed to third parties.

Data sets are erased or anonymised when the processing is concluded, unless otherwise agreed or stated in the regulations.

2.2 Contact persons for existing and potential clients/principals and suppliers

We process personal data about our contact persons with existing and potential business clients for the purpose of assignments, administration, documentation and follow-up. The source of the data is usually the contact person or their employer.

It is voluntary for contact persons to give us contact information, but it is sometimes a condition for entering into a contract with us that we receive the information we need, cf. the General Data Protection Regulation Article 6(1) (b).

The processing of personal data may also be based on our legitimate interest of fulfilling our obligations, cf. the General Data Protection Regulation Article 6(1) (f). In our assessment, based on the type of personal data we process and the fact that we provide information about the processing, your interests or fundamental rights and freedoms that require the protection of personal data will not override our legitimate interest.

We can store the data for as long as it is necessary to fulfil the purpose for which they were collected or insofar as no other exemptions apply, for example pursuant to the Bookkeeping Act. See also section 4.

2.3 External recipients of fees and reimbursement

Information needed in order to disburse fees and reimburse travel expenses are registered in the payroll system. It includes names, addresses, personal ID numbers, bank account numbers, the size of fees, tax rates, tax municipalities, outlays being reimbursed, per diem allowance rates etc.

The processing is necessary to fulfil a contract to which you are party or to comply with a legal obligation, cf. the General Data Protection Regulation Article 6(1) (b) and (c).

2.4 Former employees

We process information about former employees to be able to fulfil our obligations to the employee and the authorities. We need less information about you after the employment relationship is terminated, and the information we no longer need is shredded.

The processing of personal data is based on our legitimate interest of documenting our case processing in our capacity as employer, cf. the General Data Protection Regulation Article 6(1) (f). In our assessment, based on the type of personal data we process and the fact that we provide information about the processing, your interests or fundamental rights and freedoms that require the protection of personal data will not override our legitimate interest.

We also process personal data because we are legally obliged to do so, for example to disclose and store data pursuant to the Bookkeeping Act, the Tax Administration Act and the Act relating to employers' reporting of employment relationships and income, cf. the General Data Protection Regulation Article 6(1) (c).

As a rule, we store information about personnel matters for up to three years after the termination of an employment relationship. We store electronic information about whether a person has worked for us and how long for as long as necessary or required.

2.5 Recruitment

If you apply for a job with SNF, we need to process information about you to be able to consider your application.

The grounds for such processing are set out in the General Data Protection Regulation Article 6(1) (b) – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. If your application contains special categories of personal data, the grounds for our processing are set out in the General Data Protection Regulation Article 9(2) (b) and (h).

Providing us with information is voluntary. We will use the information you choose to give us in connection with considering the application.

As a rule, we store information for up to six months after the recruitment process has been concluded.

2.6 Website, Facebook and cookies

SNF uses cookies to collect statistics on how the website snf.no is used. The aim is to further develop and improve the website, and to pursue marketing activities.

Cookies are small text files that your browser downloads and stores in the cache when you visit or interact with a website. Cookies can be used to save previous user settings, register your browsing history and the choices you make when using these websites.

By using SNF's website, you consent to cookies being stored in your browser.

Snf.no uses cookies from snf.no. They are

- DynamicWeb
- ASP.NET Sessionld

These cookies are used to store information while you navigate the site. They do not store personal data and are not used for other purposes.

In addition, three types of cookies are used when someone performs a search. They are

- 1P JAP
 - o Time of visit/search
- CONSENT
- NID
 - Most Google users will have a preference cookie called 'NID' in their browsers. A browser sends this cookie with requests to Google's websites. The NID cookie contains a unique ID Google uses to remember your preferences and other information, such as your preferred language, how many search results you wish to have shown per page, and whether or not you wish to have Google's SafeSearch filter turned on.

Dynamic Web has a built-in statistics function to analyse visits; no other tools are used over and above this.

The grounds for this processing are set out in the General Data Protection Regulation Article $\underline{6(1)}$ (f), which allows us to process data that are necessary for the purpose of pursuing a legitimate interest that overrides the interest of the data subject. The legitimate interest is to make services on the website work. See the Act relating to Electronic Communication Section 2-7 b.

If you follow SNF on Facebook, SNF is jointly responsible with Facebook for the processing of personal data registered in Facebook allowing us to collect demographic statistics that Facebook lets us see. See also https://www.facebook.com/privacy/explanation

3. STORAGE AND SECURITY

SNF stores and discloses personal data electronically in the ERP system Unit4, in Huldt & Lillevik (no longer in operation) and Axapta (no longer in operation), as well as in paper files. SNF protects personal data by, among other things, limiting access to the data by means of access control to the various systems, firewalls and backup copies.

4. ERASURE OF PERSONAL DATA

When we no longer need the personal data to fulfil the purpose for which they were collected or processed, they will be erased. There are exemptions from this rule, however. We have our own procedures for erasing personal data that we follow.

5. YOUR RIGHTS

We will process your personal data in a lawful, fair and transparent manner and will otherwise follow the requirements that have been set, cf. the Personal Data Act and the General Data Protection Regulation Article 5.

As a data subject, you have a number of rights relating to processing, which you can contact us about.

5.1 Access to personal data

You have the right to demand confirmation that we are processing personal data about you. If we process personal data about you, you are entitled to access to the personal data and information. Reference is made to the General Data Protection Regulation Article 15. In some cases, however, exemptions apply to the right of access.

5.2 Right to rectification

In certain cases, you have the right to ask us to correct or supplement incorrect or incomplete information about you. Reference is made to the General Data Protection Regulation Article 16.

5.3 Right to erasure

In certain situations, you have the right to ask us to erase information about you. There are some exemptions from this right, however. You can read more about erasure in the General Data Protection Regulation Article 17.

5.4 Right to restriction of processing

In some cases, you can also ask us to restrict the processing of information about you, cf. <u>the General Data Protection Regulation Article 18</u>.

5.5 Right to object

If we are processing information about you based on a weighing of interests, you have the right to object to our processing of these data. Certain exemptions apply. Reference is made to <u>the General Data Protection Regulation Article 21</u>.

5.6 Right to data portability

If we are processing information about you based on consent or contract, you can ask us to transfer the data to you or to another data controller. More detailed rules concerning this are set out in the General Data Protection Regulation Article 20.

5.7 Right to complain

If you are not satisfied with our processing of your personal data or believe it is in breach of the regulations, you may file a complaint with the Norwegian Data Protection Authority. Contact information is available on their website, www.datatilsynet.no.

6. OUR CONTACT INFORMATION

Please contact us if you have any questions – our contact information is available below:

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SNF is on Facebook

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