

## Privacy Statement for MG (Moestue Group AS)

Privacy is the right to a private life and the right to control one's personal information.

Personal information is information and assessments that can be linked to an individual.

Moestue Group AS and all wholly and partly owned subsidiaries (hereafter referred to as MG) process personal information as an employer, as a service provider, for marketing purposes, and in connection with visits to our website, [www.moestuegroup.com](http://www.moestuegroup.com).

Privacy is important in MG's services, and we are committed to safeguarding the integrity, availability, and confidentiality of personal information.

This privacy statement provides comprehensive information about the personal information collected, how the information is collected and protected, and the rights you have if your personal information is registered with us.

### What personal information processing does MG undertake?

#### Customer and Supplier Information:

MG processes personal information about customers and suppliers, as well as any third parties necessary for the fulfillment of contractual obligations. Among the information processed are contact details of customers and suppliers, including the name of the contact person, email address, phone number, and job title.

The legal basis for such processing is GDPR Article 6 letters b, c, and f, as well as GDPR Article 9 letters a and b. Personal information is stored in the group's ERP system and CRM system and is deleted ten years after the end of the customer relationship, unless otherwise agreed in writing.

If you, as a customer, have access to MG's Customer Portal, our digital collaboration system between MG and the customer, we ask you to read the terms and conditions for using it. You can access the terms upon login to the portal. It should be noted that no new or additional categories of personal information are collected when using the Customer Portal.

#### Sub processors:

MG may use sub processors. We rely on general permission to use sub processors, in accordance with GDPR Article 28. When using sub processors, we confirm that they are subject to the same obligations regarding the protection and use of personal information and other customer data as MG. Suppliers acting as sub processors for MG should be able to document good internal privacy and information security procedures through certifications, reports from independent audits of the supplier, or other relevant documentation. MG may conduct security audits to ensure that the supplier processes personal information in accordance with GDPR requirements. A list of sub processors used by MG as of January 1, 2023, is provided in the table below. It should be noted that the use of sub processors depends on the services we provide and may therefore vary from customer to customer.

Name	Type of Processing	Type of Service	Data Center Location	Website
Advania	IT infrastructure provider, including application hosting, data storage, and backups	All	Norway	<a href="http://www.advania.no">www.advania.no</a>
Microsoft Azure	Storage of customer data	All	Netherlands/Ireland	<a href="http://www.microsoft.com/en-us/trustcenter">www.microsoft.com/en-us/trustcenter</a>
inCreo	Website operation and development	All	Norway	<a href="https://www.increo.no">https://www.increo.no</a>
Easyweb	Website operation and development	All	Norway	<a href="http://www.easyweb.no">www.easyweb.no</a>
Ramsalt	Website operation and development	All	Norway	<a href="http://www.ramsalt.no">www.ramsalt.no</a>
Facebook	Operation and development of social platform	Ireland	<a href="http://www.facebook.com">www.facebook.com</a>	
Instagram	Operation and development of social platform	Ireland	<a href="http://www.instagram.com">www.instagram.com</a>	
Continia	Processing of inbound and outbound invoices, and processing of other accounting data	Accounting services	Norway	Moestue Group server
Visma.net	Processing of travel expenses	Accounting/payroll services	Netherlands/Ireland	<a href="https://www.visma.com/">https://www.visma.com/</a>
Visma eAccounting	Accounting/payroll system	Accounting/payroll services	Netherlands/Ireland	<a href="https://www.visma.com/">https://www.visma.com/</a>
Microsoft Navision	Cloud-based accounting system	Accounting services	Norway	Moestue Group server
Sticos	Cloud-based HSE system	Personnel HSE system	Norway	<a href="http://www.sticos.no">www.sticos.no</a>
House of Control	Contract administration system	Contract management	Norway	<a href="https://app.houseofcontrol.no/#/dashboard">https://app.houseofcontrol.no/#/dashboard</a>
SuperOffice	CRM system	CRM system	Norway	<a href="http://www.superoffice.no">www.superoffice.no</a>
Mailchimp	Subscription system	Information distribution	<a href="http://www.mailchimp.com">www.mailchimp.com</a>	
Teletopia	SMS messaging	Information distribution	Norway	<a href="http://www.teletopiasms.no">www.teletopiasms.no</a>

Name	Type of Processing	Type of Service	Data Center Location	Website
Flickr	Image storage	Image storage	USA	To be discontinued <a href="http://www.flickr.com">www.flickr.com</a>
Twitter	Information channel	Information channel	USA	<a href="http://www.twitter.com">www.twitter.com</a>
Deltager.no	Participant registration	Participant registration and payment	Norway	<a href="http://www.deltager.no">www.deltager.no</a>
Monday.com	Project management system	Project tool	Ireland	<a href="http://www.monday.com">www.monday.com</a>
Finn	Recruitment system	HR	Norway	finn.no

#### **Processing of Personal Information in Personnel Administration:**

MG processes personal information as part of personnel administration. The personal information processed in this context includes personal information, salary information, evaluations, information about next of kin, and education/job level.

The legal basis for this processing is the fulfillment of the employment contract, in accordance with GDPR Article 6 letters b and c. Personal information related to personnel administration is retained as long as the individual is employed by MG and is deleted 5 years after the individual has left MG.

#### **Processing of Personal Information for Marketing and Use of MOESTUEGROUP.COM:**

MG processes personal information for marketing purposes. These personal details may be exchanged between companies in the MG group but will not be disclosed to other external entities.

#### **Newsletters and Seminar Invitations:**

It is possible to voluntarily subscribe to newsletters, invitations to events, and other professional materials from MG. If there is no existing customer relationship, this means that you consent to regularly receive emails with the newsletters you have chosen to subscribe to. The legal basis for this processing is GDPR Article 6 letter a. You can withdraw your consent for the storage of your contact information at any time. MG will then delete your contact information from the mailing list for the respective newsletter.

In cases where an existing customer relationship exists, MG has a legitimate interest in marketing to its customers. The legal basis for this processing is GDPR Article 6 letter f. You can request to be removed from our mailing list at any time.

In order to send the newsletters to the right person, it is necessary to register with your name and email address, company name, and job title. When signing up for one of our events, we may also ask for your phone number, address, and date of birth. This information is stored in a separate database and will not be shared with others. You can request access to this information and request that it be deleted at any time. The personal information we have stored about you, as someone who has

consented to receiving our newsletters and invitations, will be retained as long as you are a subscriber.

#### **Inquiries and Purchases via the Website:**

When using the "Contact Us" form on [moestuegroup.com](http://moestuegroup.com), you must provide your name and email address. The information is stored in the website's database managed by MG's web editor and will not be shared with others outside of MG. The information is continuously deleted from the database.

It is possible to purchase products from [moestuegroup.com](http://moestuegroup.com). In order for us to process your order, it is necessary for you to provide information about yourself and your company. The legal basis for this processing is GDPR Article 6 letter b.

**Address Register – Potential Customers:** MG stores contact information for potential customers. The information is obtained from publicly available sources, such as company websites. The purpose of this processing of personal information is to market our products.

The legal basis for this processing is GDPR Article 6 letter f. MG has a legitimate interest in marketing to potential customers. If you do not wish to be part of MG's address register, you can request to be deleted from it.

Personal information related to potential customers is deleted within one year of being entered into the database, unless a customer relationship is established or consent to further storage is given.

**Address Register – Media Contacts and Influencers:** MG stores contact information for media contacts and influencers. The information is obtained from publicly available sources, such as websites, or at the initiative of the individual. The purpose of this processing of personal information is to disseminate information about our products.

The legal basis for this processing is GDPR Article 6 letter f. MG has a legitimate interest in actively engaging with the media and influencers to inform the public about various products and their features. If you do not wish to be part of MG's address register, you can request to be deleted from it.

**Address Register and Allocation History – Allocation Customers:** MG stores contact information and allocation information about individuals who have requested to be placed on allocation lists. The information is provided by the individuals.

The legal basis for this processing is GDPR Article 6 letter a. If you do not wish to be part of MG's address register, you can request to be deleted from it. If you have not used the allocation offer within 5 years, all your information will be deleted unless otherwise agreed in writing.

**Web Analytics and Cookies:** On MG's websites <http://www.moestuegroup.com>, we log information about all visitors using Google Analytics, Google Tags Manager, and Albacross' cookies. The information logged is not linked to the visitor and cannot be traced back to you as an individual. The information is collected to better understand how our users use the website so we can optimize the pages for the user.

Like most other websites, we use a method where the information is stored in a cookie on your PC. Most browsers are set to accept cookies from websites. You can delete stored cookies by following the deletion instructions in your browser. Information on this can be found in your browser's help function. Please note that limiting access to cookies may affect the functionality of our website.

IP addresses of visitors are not normally stored, with a few exceptions: • Application errors; error logs and IP addresses are created to investigate errors. • If the system's user logs and tracking (EMS) are

activated. • Actions and IP addresses of "Back-end users," such as web editors and administrators, are stored.

**Children's Privacy:** Our website is not designed for or directed toward children under 18 years of age, and we will never knowingly collect or maintain information about children under 18 years of age.

**Processing of Information where MG is the Organizer:** MG has events where you can meet producers, employees, and other individuals interested in products imported by MG. Such events may include tastings of beverages (with and without alcohol) and may also include meals. There may also be courses designed for further education. The purpose of such events is to increase knowledge about MG's products and related fields. Personal information related to events is retained for 1 year after the course is completed. This information is stored in a separate database and will not be shared with others.

**Processing of Personal Information Related to Job Applicants:** When registering and/or subscribing to job vacancies/temporary positions at MG, as well as submitting a CV, application, and other relevant documents in connection with a job application, personal information is collected. Personal information processed in connection with recruitment includes personal information and job and education details. In some cases, personality tests of potential candidates are conducted, and MG processes the results related to the tests. The personal information is collected from job applicants. In cases where MG uses a recruitment service provider, the processing will be subject to a data processor agreement. The information will not be used for any purpose other than job searching. Personal information about job applicants will be deleted one year after the individual applied for a position at MG, unless the individual is hired or consents to longer storage. It should be noted that job applicants can have their information deleted at any time.

#### **Transfer/Disclosure of Personal Information:**

**Transfer to Third Countries:** We do not transfer personal information to countries outside the EU/EEA without written approval from the data controller. When transferring to third countries, an agreement on the transfer basis must be made, such as the Data Inspectorate's standard contracts for the transfer of personal data outside the EU/EEA, Binding Corporate Rules (BCR), or Privacy Shield.

**Disclosure:** MG does not disclose personal information to others unless required by law.

**Information Security:** We prioritize information security and have implemented routines to ensure confidentiality and integrity in our customers' data. MG has security mechanisms that include both organizational and technical measures, such as role and access management and requirements for embedded privacy in our IT systems. Material containing sensitive personal information or personal identification numbers transferred to or from MG must always be secured against access using encryption.

Detailed information about information security at MG is available to our customers upon request.

**Your Rights:** MG's processing of personal information is governed by the Personal Data Act and its associated regulations. Your rights related to our processing of personal information are included in GDPR Chapter III. Some of the most important rights are presented below:

**Right to Access:** Anyone who requests it is entitled to know what kind of processing of personal information MG carries out and basic information about these processes. Such information is provided in this privacy statement. Only in cases where MG is the data controller can we handle requests for access. In cases where MG is a data processor, requests for access should be directed to

the data controller. As a data processor, we cannot provide access to personal information to the data subject without the data controller being informed and approving the access.

If you are registered in MG's systems, you are entitled to know what information about you is registered and what security measures are in place for the processing, as long as such access does not compromise security.

You can request that the data controller provide more detailed information if necessary for you to protect your interests.

**Right to Rectification and Erasure:** If MG processes personal information about you that is incorrect, incomplete, or that cannot be processed, you can request that the information be rectified or deleted within the limits set by the Personal Data Act, the EU General Data Protection Regulation (GDPR), and other legislation. You can also request deletion if the processing of personal information is no longer necessary to fulfill the purpose for which it was collected or if the processing is based on your consent and you withdraw it. Processing will be necessary if it is required by law.

**Contact Information:**

We encourage our customers to contact their designated contact person at MG for inquiries regarding MG's handling of personal data, and these inquiries may involve others within the organization when necessary. Inquiries about requests for access, rectification, and deletion, as well as reports of deviations, should be directed to [privacy@moestue.com](mailto:privacy@moestue.com) or to Moestue Group AS, Attn: Managing Director, Bygdøy Alle 23, 0262 Oslo.

Changes to the Privacy Statement Changes may occur in our privacy statement. The date of the last modification is 01.01.2023. We encourage interested parties to regularly check our website for updates.