

October 2023

# **GENERAL PERSONAL DATA POLICY**

# ALPI's general personal data policy

ALPI's general personal data policy covers both ALPI Danmark A/S and ALPI Air & Sea A/S (subsequently simply referred to as ALPI) and is regularly updated. This is version 2.0

ALPI is the data controller and does its utmost to protect your personal data and ensure that the necessary organizational and technical security measures are in place to protect your personal data, regardless of whether you purchase ALPI's transport or other services, apply for a job, receive newsletters or simply visit ALPI's website.

You can contact us here:

ALPI Norway AS Verkseier Furulunds Vei 49 0668 Oslo Tlf. 48 19 09 99 E-post <u>alpinorway@alpinorway.no</u>

By accepting newsletters, using ALPI's website or purchasing transport or services, you consent to ALPI's processing of your personal data as described in ALPI's general personal data policy and Cookie Policy.

The company in the ALPI group that you are in contact with is the data controller in relation to the personal data that ALPI receives and processes in connection with the delivery of transport and services to you.

#### Homepage

When you use ALPI's website, ALPI will collect and register data from your computer that is necessary for the functionality of ALPI's website in accordance with ALPI's cookie policy. You will find this policy on ALPI's website under "ABOUT ALPI" / "POLICIES & CONDITIONS" / "COOKIES". The nature and extent of this data will depend on whether you have allowed the use of Cookies. Additionally, ALPI will process your name and contact information if you use a contact form on ALPI's website.

ALPI processes your personal data in accordance with the law, and our legal basis for the processing of your personal data is either your consent or ALPI's legitimate interest in accordance with Article 6 of the Data Protection Regulation. 1, letters a and f.





## **Benefits**

With the aim of providing transport and other services and handling related inquiries, ALPI receives and collects your personal data partly directly from you and partly from other data controllers. You can request ALPI to disclose the identity of these other data controllers at any time.

Your personal data is processed to fulfill your agreement with ALPI or ALPI's customer or to help with an inquiry from you (e.g. completed contact form, registration or similar).

ALPI processes your personal data in accordance with the law. Our legal basis for processing your personal data is either a contract, your consent, a legal obligation or ALPI's legitimate interest, e.g. in the case of handling legal claims, in accordance with the data protection regulation, article 6, subsection 1, letters a, b, c and f.

# Newsletters and other marketing material from ALPI

ALPI processes your name, e-mail and other contact information to send newsletters.

ALPI processes your personal data in accordance with the law, and our legal basis for the processing of your personal data is your consent in accordance with Article 6 of the Data Protection Regulation. 1, letter a.

You can always withdraw your consent.

For statistical purposes and to expand and improve ALPI's services, ALPI will anonymize and aggregate data, including personal data, collected via ALPI's website or via booking systems and the like.

In general, ALPI recommends that, regardless of purpose, you do not pass on sensitive personal data such as race, ethnic origin, religion, trade union affiliation, sexual orientation, health information, genetic or biometric data, etc.

## Job search

ALPI processes your name, photo, address, e-mail, telephone/mobile number, latest job title, education, CV, application, diploma in case of unsolicited applications and job search via job postings on ALPI's website.

ALPI processes your personal data in accordance with the law, and our legal basis for the processing of your personal data is your consent in accordance with Article 6 of the Data Protection Regulation. 1, letter a.

You can always withdraw your consent.





ALPI only uses data entered for recruitment purposes, and personal information is treated confidentially. In general, ALPI recommends that, regardless of purpose, you do not pass on sensitive personal data such as race, ethnic origin, religion, trade union affiliation, sexual orientation, health information, genetic or biometric data, etc.

We store your personal data in our recruitment system for up to 6 months after your consent. They are then deleted automatically, unless you actively choose to renew your application/CV with a further 6 months. You will be informed of this per e-mail at the end of the period.

#### Disclosure of personal data to third parties

ALPI will pass on your personal data to other companies in the ALPI group, contracted suppliers or advisers if this is necessary to fulfill ALPI's obligations towards you. Contracted suppliers can be, for example, hauliers, shipping companies, airlines, public authorities or IT suppliers who supply IT systems related to the services.

In addition, ALPI may pass on personal data in connection with the use of ALPI's website, your participation in events and when receiving newsletters and other marketing material from ALPI to hosting companies, providers of marketing services and other providers of services necessary to fulfill the above purposes.

In special cases and in accordance with the law, it may become necessary to disclose your personal data to fulfill ALPI's legal obligations, to protect ALPI's or others' rights, property and safety, and in the event of the sale or liquidation of ALPI's business or assets.

You can request ALPI to disclose the identity of these third parties at any time.

The third parties to whom your personal data is disclosed may be located outside your country of residence, but ALPI will always ensure an adequate level of data protection and a legal basis for the disclosure and transfer of your personal data, for example using the EU's Standard Contractual Clauses (SCC).

#### The period for processing your personal data

Your personal data will be processed as long as it is necessary for the purposes mentioned above and in accordance with the law. Your personal data will be deleted when it is no longer necessary to process your personal data for the purpose, unless applicable law requires ALPI to store your personal data for a longer period. How long the purpose exists varies according to which services ALPI must provide to you and the country in which the services must be provided, the legal basis and the circumstances surrounding this.





If the processing of your personal data is based on your consent, your personal data will be deleted at the latest when you revoke your consent, unless applicable law requires ALPI to store your personal data for a longer period. You can revoke your consent at any time by contacting ALPI via the contact details above.

# Your rights:

- You have the right to gain insight into the processing of your personal data
- You have the right to have incorrect information about yourself corrected
- In certain cases, you have the right to have incomplete personal data completed
- In special cases, you have the right to have your personal data deleted
- In certain cases, you have the right to have the processing of your personal data restricted
- You have the right to object to the processing of your personal data
- In certain cases, you have the right to have the personal data that you have submitted yourself transferred to yourself or another data controller (data portability)

## **Complaint access:**

If you wish to complain about ALPI's processing of your personal data, you can contact ALPI via the contact details above.

You are also entitled to file a complaint to Datatilsynet, Postboks 458 Sentrum, 0105 Oslo.