



## **Privacy Policy**

### **General**

Hefring Ltd. is concerned about the privacy of individuals and takes privacy very seriously. The company strongly emphasizes that the processing of personal data is always in accordance with the applicable privacy laws. This notice states what personal data the company collects in relation to its operations and for what purpose. Here you can find information about other recipients of the information and for how long we keep the information.

You can also find information on the basis on which Hefring Ltd. collects personal data, what rights individuals have, and further important information related to the Act no. 90/2018 on Data Protection and the Processing of Personal Data.

### **What is personal data and processing of personal data?**

Personal data is information that relates to an identified or identifiable individual, such as name, ID number, address, email address, telephone number, finances, health, IP address and more. The processing of personal data means all processing and use of personal data such as collection, registration, preservation, alteration or deletion.

There are "special categories" of more sensitive personal data which are more private in nature and therefore require a higher level of protection, such as genetic data, biometric data, information about sex life or sexual orientation, race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and health.

The processing of personal data refers to all processing and use of personal information such as collection, registration, storage, modification or deletion.

## **How does Hefring Ltd. process personal data?**

Processing of personal data is carried out on a legitimate basis and in accordance with the Privacy Act and the processing of personal data no. 90/2018.

The company ensures that the following principles are adhered to:

- 1) that personal information is processed fairly.
- 2) that personal information is only collected for a clear purpose.
- 3) that no more personal information is collected than is necessary.
- 4) ensure that your personal information is accurate and updated when necessary.
- 5) that personal information will not be kept longer than is necessary.
- 6) ensure the security of personal information with appropriate security measures.

## **On whom does Hefring Ltd. collect personal data?**

In our operations it is necessary to collect and process personal data about different groups of individuals. The personal data held by the company may be about customers, contractors and other third parties that are necessary to communicate with.

## **What personal data does Hefring Ltd. collect about you?**

We collect different personal data about different groups of individuals depending on the activities of the company. In all circumstances, we endeavour to collect only the personal data necessary for the purpose of the processing.

We collect and handle the following categories of personal information about applicants, former and current staff:

- basic information (name, address, email address, etc.)
- photo
- trade union membership
- bank information
- tax information

- information:
  - from a job application
  - from the employment contract
  - on wage payments
  - on health
  - from e-mail communications
  - boating telematics data

We collect necessary information about our customers, such as name and in some cases identification number. The company also needs to keep the necessary contact information about the contractors and other third parties, such as name and email address.

We collect the following personal information about customers (B2B) and contacts of their customers (B2C):

#### ***E-mail Communication***

The information we collect when it comes to email communication with customers, customer contacts and others is the name, email address and the communication itself.

#### ***Purchasing***

When purchasing our solutions, we collect and process following information: solution choice, identifying and communication, payment method and amount.

#### ***Contracts***

We retain contracts that the company makes in its operations. The information we collect in connection with contracts is identifying and communication information.

#### ***Customer relationship management***

The information we collect in order to keep track of customers and clients' contacts (legal entities), are identifying and communication information.

### ***Billing***

The information we collect and process when charging customers for our services are identifying and communication information.

### ***Special requests of customers.***

In connection with requests from customers regarding our services we collect identifying and communication information as well as the request itself.

### ***Contact through our website***

We receive inquiries and suggestions from customers through our website and collect for this purpose identification and contact information as well as communication content.

### ***Social media (LinkedIn and Facebook)***

In connection with social media marketing, we collect images and identifying and communication information.

When we need to collect sensitive personal data, such as health information and information on employee trade union membership, special care is taken in handling such information.

### **Why does Hefring Ltd. collect personal data about you?**

The purpose of collecting the information is:

- to be able to fulfil contractual obligations, for example with negotiators.
- to be able to provide customers with the requested services.
- to safeguard the legitimate interests of the company, for example with security cameras for security and asset management purposes.

### **On what legal basis does Hefring Ltd. process your personal data?**

We collect and processes personal data on the following legal basis:

- your consent.
- to fulfil contractual obligation.
- to comply with legal requirements.
- to safeguard the legitimate interests of the company.

### **For how long does Hefring Ltd. keep your personal data?**

We will keep your data if there is a statutory or legal requirement to do so or so long as we need in order to provide our services to you, after which time it will be destroyed. For accounting and auditing purposes we may retain your personal data for a period of time after our services have been rendered.

Your information that we use for direct marketing purposes will be kept with us until such time you notify us that you no longer wish to receive marketing information from us.

### **From whom does Hefring Ltd. collect information about you?**

We collect your personal data directly from you. If third-party personal data is collected, we will, as far as possible, endeavour to inform the individual concerned.

### **When does Hefring Ltd. share your personal information to third parties and why?**

We share personal data to third parties hired by the company to perform certain tasks, such as service providers, agents or contractors. In these cases, the company enters into a data processing agreement with the party in question. Such an agreement stipulates, among other things, the obligation to comply with Hefring Ltd. instructions on the processing of personal data and it is not permitted to use it for any other purpose. It is also obligatory to ensure the security of the information in an appropriate manner.

Hefring Ltd. also shares information to third parties when required to by law.

### **Transfer of personal data outside the European Economic Area**

Hefring Ltd. is aware that stringent conditions apply to the transfer of personal data to countries located outside the European Economic Area. The company does not under any circumstances do so unless there is sufficient authority to do so under the Act no. 90/2018 on Data Protection and the Processing of Personal Data.

## **What are your rights?**

If you have given your consent to the processing of certain personal data, you are entitled under the Act no. 90/2018 on Data Protection and the Processing of Personal Data to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. You also enjoy other rights, such as the right to access your personal data, the right to have inaccurate personal data rectified, the right to have personal data erased, the right to request the restriction or suppression of your personal data, and the right to data portability. Keep in mind that your rights are not always absolute and may be subject to various conditions.

## **Security of personal data**

Hefring Ltd. has implemented appropriate technical and organizational security measures to ensure the security of personal data in accordance with the Act no. 90/2018 on Data Protection and the Processing of Personal Data. This means, among other things, that the only employees that have access to personal data are the ones required to by their work. In addition, the company promotes regular training for employees on the security and processing of personal data.

## **Hefring Ltd. Contact Information**

Company name: Hefring Ltd.

SSN. 521218-0450

Address: Grandagarður 16, 101 Reykjavík.

E-mail: [info@hefringmarine.com](mailto:info@hefringmarine.com)

## **Contact Information of the Data Protection Officer (DPO)**

If you have any questions about how Hefring Ltd. handles your personal information, here is the contact information for our DPO:

E-mail: [dpo@dattacalabs.com](mailto:dpo@dattacalabs.com)

## **Right to file a complaint with the Data Protection Authority**

If you doubt that Hefring Ltd. processes your personal data in accordance with the Act no. 90/2018 on Data Protection and the Processing of Personal Data, you have the right to file a complaint with the Data Protection Authority ([www.personuvernd.is](http://www.personuvernd.is)).

### **Changes to this Privacy Notice**

This Privacy Notice may change from time to time in accordance with changes to applicable laws and regulations or if changes are made to how Hefring Ltd. processes personal data. Once changes have been made, they will come into effect once an updated Privacy Policy has been issued on Hefring Ltd. website.

*Updated: January 2022*