

Erasure policy

For Bilpleie Holdco AS and its subsidiaries

1. Purpose and Scope

The purpose of **Erasure Policy** is to ensure that **Bilpleie Holdco AS** and its subsidiaries complies (hereinafter referred to as "the Company") with the requirements of the **General Data Protection Regulation (GDPR)** (EU 2016/679, Article 5 - Principles relating to processing of personal data; Article 17 - Right to Erasure ("Right to be Forgotten")) and the **Norwegian Personal Data Act** (*Personopplysningsloven, LOV-2018-06-15-38*) regarding the secure and timely deletion of Personal Data.

The policy establishes clear rules for when and how **Personal Data** must be erased or anonymized in order to protect the rights of **Data Subjects**, minimize risks related to unlawful processing, and uphold the company's legal and ethical responsibilities.

This policy applies to:

1.1. All personal data processed by **The Company**, regardless of format (digital, paper-based, or backups).

1.2. All departments, business units, and employees handling Personal Data.

1.3. All third parties, processors, or contractors acting on behalf of **the Company**.

This policy forms part of **the Company's** management system, as described in the **General Guidelines for Data Protection**¹.

2. Responsibility

The **overall responsibility** for ensuring compliance with **Erasure Policy**, as well as with the **General Data Protection Regulation (GDPR)** and the **Norwegian Personal Data Act** (*Personopplysningsloven*), lies with the **Data Controller** (*CEO of Bilpleie Holdco AS and CEOs for each subsidiary*).

The policy covers the erasure of **Personal Data** collected from employees, customers, suppliers, partners, and any other **Data Subjects**, in accordance with applicable legal obligations and business requirements. For more information, see the **Data Processing Protocol**, which outlines the specific responsibilities and procedures for each respective system.

Every employee is responsible for ensuring that Personal Data stored in personal or shared file areas, such as on public access computers or/and **OneDrive, Google Drive, or other storage solutions**, is deleted once it is no longer needed for business purposes or when a deletion request has been made. Employees must follow **the Company's Erasure policy** and **Data Processing Protocol** to prevent unnecessary storage of Personal Data.

¹ **General Guidelines for Data Protection, For Bilpleie Holdco AS and its subsidiaries, confirmed on 08.09.2025.**

3. Description

The Company shall not store **Personal Data** for longer than is necessary to implement the purpose of the treatment. Unless the **Personal Data** must be stored in accordance with other legislation, for example, the **Archives Act** and/or the **Accounting Act**, they must be deleted continuously.

3.1. Data Retention and Deletion:

a) Historical and Statistical Purposes

Some **Personal Data** may be retained after the original purpose has been fulfilled², but only for historical, research, or statistical purposes. In such cases, the **Data Controller** must ensure that the stored information does not make it possible to identify the **Data Subject** longer than necessary.

Example: Age and gender may be retained for reporting on staff turnover, but not in combination with name, date of birth, social security number, or other identifiers.

b) Accuracy and Corrections

Erasure of **Personal Data** shall be supplemented by the registration of correct and complete information. If correction of Personal Data is not possible, and the stored data provides a misleading or inaccurate image, such data shall be deleted.

c) Data Processor Responsibilities³

- Assist **The Company** in fulfilling its obligations towards **Data Subjects**, including the right to erasure under **General Data Protection Regulation (GDPR) (EU 2016/679, Article 17 - Right to Erasure (“Right to be Forgotten”))**
- Delete or return **Personal Data** upon termination of the service, unless retention is required by law.
- Make available all information necessary to demonstrate compliance and allow for audits by **The Company**.

d) HR Department Responsibilities

The HR Department of the Company has **daily operational responsibility for processing Personal Data, Sensitive Data** in the *HR system Plus Office*. This includes the archiving and deletion of Data related to employment in accordance with retention requirements. All requests for erasure from Data Subjects shall be documented, together with the actions taken to fulfil the request.

e) Automated Deletion Routines

Where technically possible, automatic deletion rules and routines shall be implemented in the

² **Privacy Policy for Employees, 3.3. Data Storage and Retention, For Bilpleie Holdco AS and its subsidiaries, confirmed on 08.09.2025.**

Data Processing Protocol, For Bilpleie Holdco AS and its subsidiaries, confirmed on 08.09.2025.

³ Bilpleie Holdco AS may engage external service providers that act as **Data Processors**. These Processors shall only process Personal Data on documented instructions from Bilpleie Holdco AS and in accordance with signed **Data Processing Agreements (DPAs)**.

systems to ensure that Personal Data are deleted in line with the relevant legal requirements and retention deadlines.

4. Review and Updates


4.1. Erasure Policy shall be reviewed at least **once per year**, and updated **whenever necessary** to reflect:

- a) changes in legal or regulatory requirements,
- b) updates in processing activities or business practices,
- c) findings from internal or external audits, risk assessments, or incidents.

4.2. The **responsibility for initiating** the review lies with the **Data Controller** (*CEO of Bilpleie Holdco AS and CEOs of its subsidiaries*).

ISSUED

by the **HR Manager** of Bilpleie Holdco AS

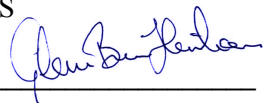


Sandris Rakauskis
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Sandris Rakauskis
HR Manager
Telefon: 92283811
E-post: sandris@bilbyenbilpleie.no

CONFIRMED

by the **CEO** of Bilpleie Holdco AS



Glenn Brun Henriksen
08.09.2025.

bilpleie holdco as
Vassbotnen 13, 4313 Sandnes
NO 925 536326 MVA