

Privacy Policy for Employees

For Bipleie Holdco AS and its subsidiaries

1. Purpose and Scope

Bipleie Holdco AS, including **subsidiaries**, as **an Employer**, needs to collect and process **personal data** about you as **an Employee**.

Some of the information collected will also be retained after the employment relationship has ended. The **personal data** is processed to manage the employment relationship and for historical data after the employment relationship has ended. The information is primarily handled in the **Plus Office system** and in payroll and other personnel systems.

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

2. Responsibility

The **data controller** for your personal data is Bipleie Holdco AS, **represented by its CEO**. In addition, **the CEO of the subsidiary** where you are employed is responsible for monitoring compliance, following up on data protection matters, and notifying as required.

The **daily responsibility** is delegated to the **HR Manager**, who can be contacted regarding this Privacy Policy and the processing of your personal data.

3. Description

3.1. What is collected and why

Below you will find an overview of the purposes of the processing and which personal data we process:

a) **Payroll and personnel system:**

contact information (*phone number, address, email address, name of emergency contact person and their phone number (for use in case of accident)*), employment contract, agreements referring to employment contract, statements, notifications, protocols from meetings, minutes from employee interviews, annual meeting notes, notes from Trial period and Seniority level evaluation, certificates and other personnel follow-up, workplace and work tasks, CV, information about sick leave, leave of absence and other absence information, holiday overview, salary overview, timesheets, etc.

The processing is necessary for us to fulfill the employment contract we have with you and to manage the employment relationship, as well as for internal reporting and audits, surveys, conversations, interviews, etc., and information that already exists in our systems.

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

- b) **To fulfill our statutory duty to follow up on reports of critical conditions in the workplace**, it may be necessary to process personal data to handle the report case. This applies to both information received from the reporter through the Plus Office reporting system or via other channels, information obtained through our own investigations, conversations, interviews and information that already exists in our systems. You can find more information about the process in a report case in our reporting procedure.²
- c) **Exercise of rights and obligations imposed by public authorities (tax, sick leave, leave of absence)**: social security number, payment information, health information, etc. This means that the processing is necessary to fulfill the employment contract we have with you and to comply with statutory requirements.
- d) **Health information** is processed only to the extent necessary to fulfill statutory requirements, including payment of sick pay, follow-up of sick leave, and workplace accommodation as a result of this. In other cases, the processing of your health information will be based on your consent.
- e) **Time registration system**: The purpose of this is to control time usage and as a basis for invoicing. Personal data registered are name, employee number, worked hours, holiday, and absence.
- f) The employer may use your **images and videos** for purposes such as publication on public websites, and similar social media channels. Such use will always be based on your **explicit consent**. Consent will be incorporated as a clause in new employment contracts and, for existing employees, confirmed through a separate agreement referring to the employment contract. You may withdraw your consent at any time without negative consequences for your employment. Use beyond this – for example, in larger marketing campaigns or other specific purposes – may require separate, specific consent from you.

3.2. Disclosure of personal data to others

The Employer **does not disclose your personal data** to others unless there is a **legal basis** for such disclosure. Examples of such a basis would typically be because you have consented to it, because the disclosure is necessary to fulfill an agreement with you, or there is a legal basis that requires us to provide the information.

The employer may fulfill **legal obligations** regarding the provision of information and compliance, and disclose information related to social security contributions or working conditions to public authorities, such as the Norwegian Labour and Welfare Administration (NAV) or the Labour Inspection Authority (Arbeidstilsynet). Personal data and information not covered by the request for

² **Guidelines for Notification of criticism (Whistleblowing)**, revised and confirmed on 05.05.2025

access should not be included in the documentation provided. When the contract/project is completed, all personal data for which there is no longer a processing basis should be deleted.

The Data Controller uses Data Processors to collect, store, or otherwise process personal data on our behalf. In such cases, we have entered into agreements to ensure information security at all stages of the processing. Such data processors may be accountants, recruitment systems, personnel systems, payroll systems, IT systems, HSE systems, etc.

3.2. Data Storage and Retention

The Employer stores your personal data only for as long as necessary to fulfill the purpose for which the data was collected, unless a longer retention period is required by law.

For specific categories of personal data, the retention periods are as follows:

- Information related to recruitment, such as CV, interview notes and records, internal assessments, etc., is deleted after the Trial period (unless you have consented to longer retention). Certificates, trade certificates, competence certificates, etc. are retained throughout the employment relationship.
- Information related to your employment stored in the personnel file is subject to regular review. Upon termination of your employment, we will evaluate the personnel file and delete all information that is no longer necessary. The Exceptions Log in Plus Office is used to document cases where personal data is retained beyond the standard retention periods defined in the company's **Data Processing Protocol and Record of Processing Activities**. Certain documents may need to be retained for legal or administrative purposes, for example the employment contract, workplace details, job category(ies), and other information documenting the employment relationship. Such documents are stored in the digital personnel file **in Plus Office** and will be retained only for as long as required by applicable law or for the establishment, exercise or defense of legal claims.
- Personal data related to accounting, such as timesheets, overtime records, etc., is retained for at least 3.5 years after the end of the accounting year to which the records relate.
- Personal data related to travel expenses is retained for accounting purposes and will be deleted 5 years after the end of the relevant accounting year.
- Records of disciplinary decisions, suspensions, notices, and related actions are deleted after 2 years, unless new circumstances (e.g., additional notices or other breaches) require longer retention.
- Pictures and videos of you that you have consented to us using will be retained for as long as your consent remains valid.
- Your email inbox and personal user data within the company's IT systems will be deleted no later than 30 days after the end of your employment.
- Personal data processed in connection with a report will be retained until a final decision has been made in the case. If legal or disciplinary measures are initiated as a result of the report,

all related information will be retained until the expiry of appeal deadlines or complaint procedures.

4. Your rights when we process personal data about you

You have the right to request access to, correction of, or deletion of the personal data we process about you. You also have the right to request restriction of processing, to object to the processing, and to request data portability³. More information about these rights can be found on the **Norwegian Data Protection Authority's (Datatilsynet)** website⁴.

To exercise your rights, please contact **HR Manager Sandris Rakaukis by email**.⁵ We will respond to your request as soon as possible, and **no later than 30 days**. Before we grant access to your personal data, we may ask you to confirm your identity or provide additional information. This is to ensure that access is only granted to you and not to someone impersonating you.

5. Complaints

If you believe that we are processing your personal data in violation of this policy or privacy legislation, you can **file a complaint** with the Norwegian Data Protection Authority (**Datatilsynet**). You will find their contact details on their website.

6. Legal basis for processing

The processing of personal data is based on the following legal grounds:

- **GDPR Article 6 (b) and (c), and GDPR Article 9 (2)(b)**
- **Regulations on information, duty to ensure compliance, and right of access, § 6 and § 9**
- **Accounting Act § 13 b**
- **Civil Servants Act § 25 (4)**

For more information, please see the **Norwegian Data Protection Authority's (Datatilsynet)**

website: www.datatilsynet.no

ISSUED


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


Sandris Rakaukis
15.09.2025.

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CONFIRMED

by the **CEO** of Bilpleie Holdco AS


Glenn Brun Henriksen
26.09.2025.

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³ You can ask to receive your personal data in a digital format or have it transferred to another company.

⁴ Datatilsynet - personvern og informasjonssikkerhet | Datatilsynet

⁵ sandris@bilbyenbilpleie.no