

# Procedure for the Disclosure of Personal Data

*For Bilpleie Holdco AS and its subsidiaries*

## 1. Purpose and Scope

The purpose of this procedure is to ensure that **Bilpleie Holdco AS** and its subsidiaries (*hereinafter referred to as “the Company”*) fulfills its obligations as a **Data Controller**. This procedure does not cover the transfer of **Personal Data** to **Data Processors**, as such transfers are governed by the respective **Data Processing Agreements (DPAs)** entered into with each external service provider.

This procedure forms part of **the Company’s** management system, as described in the **General Guidelines for Data Protection<sup>1</sup>**.

## 2. Responsibility

According to the law, the overall responsibility lies with the **Data Controller**, represented by the **CEO of Bilpleie Holdco AS**. The CEO of Bilpleie Holdco AS **delegates** this responsibility to the **CEO of each subsidiary**, authorizing them to approve the disclosure of **Personal Data** within their respective subsidiary in accordance with applicable legal requirements and this procedure.

The **CEO of Bilpleie Holdco AS** also **delegates** this responsibility to the **HR Manager and HR Assistant**, who may approve the disclosure of **Personal Data** within the scope of their role.

## 3. Description

The disclosure of **Personal Data** to third parties is considered *processing* pursuant to **Section 2 of the Norwegian Personal Data Act (Personopplysningsloven, LOV-2018-06-15-38)**, which defines “processing” to include *disclosure by transmission, dissemination or otherwise making available*. Such disclosure therefore requires a lawful basis in accordance with **GDPR Article 6**.

This means that the external legal entity must have a **lawful basis** for requesting access to Personal Data.

### 3.1. Lawful Basis

- a) The external legal entity must have a valid legal basis for requesting access.  
Examples of such entities include: **property owners, the police, regulatory authorities, or courts of law**.
- b) The purpose of disclosure must be in line with applicable legislation such as the **Working Environment Act (Arbeidsmiljøloven)**, contractual obligations, or other statutory

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

requirements.

If no lawful basis exists, disclosure shall not be granted.

### 3.2. Court Orders and Written Documentation

- a) Disclosure of personal data should only occur after receiving a **court order** or a **legal provision in writing** that clearly authorizes the external party's access.

All such documentation must be retained for compliance and audit purposes.

### 3.3. Consent as an Alternative

- a) If no other lawful basis exists, the **Data Subject's explicit consent** may be obtained as an alternative legal ground.
- b) Consent must be **freely given, specific, informed, and documented**. The **Data Subject** must also be informed of their right to withdraw consent at any time.

## 4. Documentation and Logging

All activities related to the disclosure and handling of Personal Data shall be **documented** and **logged**.

**4.1. Documentation** refers to the preparation and maintenance of formal records, such as procedures, guidelines, reports, and approvals, which describe how **Personal Data** is processed and disclosed. Documentation shall be accurate, up to date, and stored in accordance with company requirements.

**4.2. Logging** refers to the operational recording of events in a system, process, or activity. This includes, for example, error logs in IT systems, records of performed actions, and maintenance logs. **Logging** shall ensure traceability, accountability, and serve as evidence of all relevant activities related to the processing and disclosure of Personal Data.

Both documentation and logging shall be protected against unauthorized access, tampering, or deletion, and shall be retained for the period required by applicable laws and **the Company's General Guidelines for Data protection and its procedures and policies**<sup>2</sup>.

**4.3.** All disclosures of Personal Data to third parties shall be documented to ensure accountability and compliance with the **General Data Protection Regulation (GDPR)** and the **Norwegian Personal Data Act (Personopplysningsloven)**.

The documentation shall include at minimum:

- a) Date and time of disclosure.
- b) Identity of the requesting party (name/organization).

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<sup>2</sup> **General Guidelines for Data Protection, 8. Requirements and Obligations, For Bipleie Holdco AS and its subsidiaries, confirmed on 08.09.2025.**

- c) Legal basis for the disclosure (e.g., court order, statutory requirement, contractual obligation, consent).
- d) Purpose of the disclosure.
- e) Categories of personal data disclosed (not full data records).
- f) Name and role of the person who approved the disclosure.
- g) Method of transfer (e.g., encrypted email, secure portal, registered mail).
- h) References to supporting documents (e.g., written request, court order, signed consent).

**The log of disclosures is securely stored in the Plus Office system<sup>3</sup> and accessible only to authorized personnel.** Logs shall be retained for a minimum of **5 years**, unless otherwise required by law.

## 5. Final Note

This procedure shall be reviewed on an **annual basis**, or earlier if required by changes in law, regulations, or internal policies.

### ISSUED


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

  
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03.09.2025.

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### CONFIRMED

by the **CEO** of Bipleie Holdco AS

  
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08.09.2025.

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<sup>3</sup> Plus Office system, in the subsection **Control Logs**