

# EMPLOYEE PRIVACY STATEMENT

Last updated 03.09.2024

Your privacy is important to us and to Société Générale Group to which Ayvens belongs. This is a matter of priority for us and we have implemented strong principles in that respect, especially in regards of the EU General Data Protection Regulation. Ayvens S.A. and its affiliated entities (hereafter “**Ayvens**”) value the trust of their employees and are committed to protecting the personal data of employees (including former employees, contractors, seconded staff and trainees and (former) executive or non-executive directors of Ayvens or (former) members of the supervisory board or similar to Ayvens) (“**Employees**”).

This Employee Privacy Statement (the “**Statement**”) describes our practices in connection with the personal information (“**Personal Data**”) that we collect about you and your working relationship with us, or your family, domestic/civil partner or dependents (the “**Dependents**”) in the course of your employment with Ayvens S.A. or one of our affiliates.

Personal Data submitted elsewhere on Ayvens’ and its affiliates’ websites will be used in accordance with our [global privacy statement](#).

## 1. WHO ARE WE?

"Ayvens is responsible for the processing of your personal data (data controller). Ayvens may also be referred to as '**we**,' 'our,' or 'us.'

Ayvens Norge AS

Address: Ayvens Norge AS, Brynsengveien 10, 0667 Oslo"

## 2. WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

We collect and process information about you for a variety of reasons. Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, storage or erasure (“**Processing**”).

Where none of the purposes and legal grounds apply and also in case we process your Personal Data based on your consent, your decision to provide Personal Data to Ayvens is voluntary. Where the provision of Personal Data is a statutory or contractual requirement, or a requirement to enter into the employment agreement, we will inform you about this. If we collect or process Personal Data based on your consent, you may withdraw your consent at any time without consequences. The withdrawal of consent shall not affect the lawfulness of the processing based on such consent before its withdrawal.

We collect information provided by you in connection with your employment, including:

- **Personal Details:** Name, employee identification number(s), work and home contact details (address, telephone number, e-mail address and other contact information), language(s) spoken, gender, date of birth, national identification number/social security number, marital/civil partnership, domestic partners, Dependents, disability status, emergency contact information and photograph;
- **Official Documentation and Documentation Required under Immigration Laws:** Registration of availability of certificate of conduct, citizenship, identification card and passport data, details of residency or work permit;

- **Compensation and payroll:** Base salary, bonus, benefits, compensation type, salary step within assigned grade, details on stock options, stock grants and other awards, currency, pay frequency, effective date of current compensation, salary reviews, banking details, working time records (including vacation and other absence records, leave status, hours worked and department standard hours), pay data and termination date;
- **Position:** Description of current position, job title, corporate status, management category, job code, salary plan, pay grade or level, job function(s) and sub function(s), company name and code (legal employer entity), branch/unit/department, location, employment status and type, full-time/part-time, terms of employment, employment contract, work history, hire/re-hire and termination date(s) and reason, length of service, retirement eligibility, promotions and disciplinary records, date of transfers, and reporting manager(s) information;
- **Talent Management Information:** Details contained in letters of application and resume/CV (previous employment background, education history and current trainings, professional qualifications, language and other relevant skills, certification, certification expiration dates), information necessary to complete a background check, details on performance management ratings, development programs planned and attended, e-learning programs, performance and development reviews, appraisals, disciplinary records, willingness to relocate, driver's license information, and information used to populate employee biographies;
- **Management Records:** Details of any shares of common stock or directorships.
- **System and Application Access Data:** Information required to access company systems and applications such as System ID, LAN ID, email account, instant messaging account, mainframe ID, previous employee ID, previous manager employee ID, system passwords, employee status reason, branch state, country code, previous company details, previous branch details, and previous department details, and electronic content produced using our systems;
- **Special Categories of Personal Data:** we may process Special Categories Personal Data:
  - if processing is necessary for the purposes of carrying out the obligations and exercising specific rights of Ayvens or of the employee in the field of employment and social security and social protection law in so far as it is authorized by local law or a collective agreement pursuant to local law;
  - for the establishment, exercise or defence of a legal claim;
  - for the protection of the vital interests of the employee or of another natural person where the individual is physically or legally incapable of giving consent;
  - if the processing relates to personal data which are manifestly made public by the employee.

Besides the more general legal grounds mentioned above, we may collect and use the following types of Special Categories of Personal Data for the following purposes to the extent permitted by law:

- **Racial or ethnic data:**
  - in some countries photos and video images qualify as racial or ethnic data. To the extent permitted by local laws, Ayvens may process photos (e.g., a copy of a passport containing a photo) and video images for the protection of Ayvens' and others' assets, including the pre-and in-employment screening and monitoring of Employees, to verify and confirm advice in the course of business (e.g., when you participate in video conferencing which is recorded), for site access and security reasons and for inclusion in employee directories.
  - to the extent permitted by local laws, Ayvens may process racial or ethnic data for providing preferential status to persons from particular ethnic or cultural minorities to remove or reduce inequality or to ensure diversity in staffing, provided that use of the relevant Special Categories of Personal Data allows for an objective determination that an employee belongs to a minority

- group and the employee has not filed a written objection against the relevant processing; and
  - for administering employee affinity groups.
- **Physical or mental health data** (including any opinion of physical or mental health and data relating to disabilities and absence due to illness or pregnancy):
  - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services based on local law or pursuant to a contract with a health professional who is subject to professional confidentiality requirements;
  - proper implementation of laws, administering pensions, health and welfare benefit plans, maternity, paternity or family leave programs, or collective agreements (or similar arrangements) that create rights depending on your state of health;
  - accommodating persons with a particular disability to remove or reduce inequality or to ensure diversity in staffing, provided that use of the relevant Special Categories of Personal Data allows for an objective determination that the Employee belongs to the relevant category and the Employee has not filed a written objection against the relevant Processing;
  - reintegrating or providing support for employees entitled to benefits in connection with illness or work incapacity;
  - for the pre-and in-employment screening and monitoring of Employees and for assessing and making decisions on (continued) eligibility for positions, projects or scope of responsibilities; and
  - providing facilities in the workplace to accommodate health problems or disabilities.
- **Criminal data** (including data relating to criminal behaviour, criminal records, or proceedings regarding criminal or unlawful behaviour):
  - assessing an application by you and to make a decision about you or provide a service to you; and
  - protecting the interests of Ayvens or its employees and clients, including the safeguarding of the security and integrity of the financial sector with respect to criminal offences that have been or, given the relevant circumstances are suspected to be or have been, committed against Ayvens or its employees and clients and further for pre- and in-employment screening and monitoring of employees.
- **Sexual preferences** (including data relating to partners of employees):
  - to administer employee pensions and benefits programs; and
  - to administer employee memberships.
- **Religious or philosophical beliefs:**
  - to accommodate religious or philosophical practices, dietary requirements, or religious holidays;
- **Biometric data** (e.g., fingerprints):
  - for the protection of Ayvens and employee assets, site access and security reasons;
- **Any other information** you provide us with.

Employee handbooks and/or notices provided by your Ayvens entity provide additional details or information.

Ayvens is an equal opportunity employer, which means we offer equal treatment to all employees. In certain cases, depending on local rules and regulations, we are required to ask questions about racial or ethnic origin, gender, and disability of our employees, for purposes of monitoring equal opportunity in our employment processes. If not required by law, we will ask you to provide this information for the same purposes, which you can provide on a voluntarily basis. We ask that you avoid submitting information which

may qualify as sensitive information and/or Special Categories of Personal Data under applicable law, except where such information is legally required.

### 3. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect Personal Data in the course of your employment or internship with Ayvens in a variety of ways, including:

- **As a result of the applicant and candidate recruitment process** in connection with your person;
- **Directly from you or from other sources**, such as managers, other colleagues, references you provide, prior employers, background check providers, health care providers and/or local authorities;
- **Through cookies and other tracking technologies.** We and our service providers use “cookies” and similar technologies on [ ]. Please see our [Cookies Policy](#) for more information.

### 4. WHY AND ON WHICH LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

We collect and process Personal Data about you for one or more of these purposes:

- **Managing Workforce:** Managing work activities and personnel generally, including recruitment, appraisals, performance management, promotions and succession planning, rehiring, administering salary, and payment administration and reviews, wages and other awards such as stock options, stock grants and bonuses, healthcare, pensions and savings plans, training, leave, managing sickness leave, promotions, transfers, secondments, honouring other contractual benefits, providing employment references, loans, performing workforce analysis and planning, performing employee surveys, managing disciplinary matters, grievances and terminations, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of training requirements and career development activities and skills, workforce reporting and data analytics/ trend analysis, and creating and maintaining one or more internal employee directories.

Legal basis: We will engage in these activities to manage our contractual relationship with you, based on our legitimate interests and/or to comply with a legal obligation.

- **Workforce Analytics:** We use workforce analytics for succession planning, workforce management, data security. For instance, we use workforce analytics to assist in planning succession and to ensure business continuity, to design employee retention programs and diversity initiatives, to offer training opportunities and to identify patterns in the use of technology systems to information entrusted to us as well as to protect Ayvens’ people and property.

Legal basis: We will engage in these activities based on our legitimate interests.

- **Communications, Facilities and Emergencies:** Facilitating communication with you, ensuring business continuity and crisis management, providing references, protecting the health and safety of employees and others, safeguarding and maintaining IT infrastructure, office equipment, facilities and other property, facilitating communication with you and your nominated contacts in an emergency.

Legal basis: We will engage in these activities to manage our contractual relationship with you, based on our legitimate interests and/or to comply with a legal obligation.

- **Business Operations:** Operating and managing the IT, communications systems and facilities, managing company assets, allocating company assets and human resources, strategic planning, project

management, business continuity, compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals and integration with purchaser.

Legal basis: We will engage in these activities based on our legitimate interests and/or to comply with a legal obligation.

- **Health, safety and integrity, including the safeguarding of the security and integrity of the financial sector:** Involving the protection of the interests of Ayvens and its Employees and clients, including the safeguarding of the security and integrity of the financial sector, in particular the detecting, preventing, investigating and combating, criminal or objectionable conduct directed against Ayvens or its Employees and clients, including the pre-and in-employment screening and monitoring of Employees, including the daily screening against publicly available government and/or law enforcement agency sanctions lists and other third-party data sources. Furthermore, background check reports may be conducted about you, your Dependents and/or anyone else in connection with you, as permitted by applicable law, for the purpose of preventing (the appearance of) a conflict of interest, the fight against corruption and influence peddling and U.S. person identification and in the context of conduct and ethics policies. This activity also includes occupational safety and health, the protection of Ayvens and Employee and client assets and the authentication of Employee status and access rights.

Legal basis: We will engage in these activities based on our legitimate interests and/or to comply with a legal obligation.

- **Monitoring:** Monitoring compliance with the Société Générale Code of Conduct and internal policies, including pursuant to Ayvens policies and procedures with regard to monitoring of telephone, email, internet and other company resources, monitoring of business confidential information shared using company resources to prevent data losses, and other monitoring activities as permitted by local law. Personal Data obtained from monitoring may be analysed and used as evidence in any disciplinary or other proceedings against its personnel brought by Ayvens or an external authority or a related investigation; and provided to regulatory bodies or agencies having jurisdiction over Société Générale Group and its affiliated entities in relation to investigations or enquiries.

Legal basis: We will engage in these activities based on our legitimate interests and/or to comply with a legal obligation.

- **Compliance with laws and regulations:** Complying with legal and other requirements applicable to our businesses in all countries in which we operate, such as income tax and national insurance deductions, record-keeping and reporting obligations, conducting audits, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation, and managing any internal complaints or claims (including those received through a whistleblowing process), conducting investigations including employee reporting of allegations of wrongdoing, policy violations, fraud, or financial reporting concerns, and complying with internal policies and procedures.

Legal basis: We will engage in these activities to manage our contractual relationship with you, based on our legitimate interests and/or to comply with a legal obligation.

- **Protecting the vital interest of Employees:** necessary for the physical integrity or life of an individual, where the individual is physically or legally incapable of giving consent, or for humanitarian purposes, including for monitoring epidemics and their spread or in situations of humanitarian emergencies, in particular in situations of natural and man-made disasters.

Legal basis: We will engage in these activities, if necessary, in order to protect the vital interests of you or of another natural person.

- **Mergers and acquisitions:** activities in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Ayvens business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Legal basis: We will engage in these activities based on our legitimate interests.

## 5. WHO HAS ACCESS TO YOUR DATA?

Due to the global nature of our operations, human resources related data is shared throughout Ayvens and its affiliated entities. Ayvens also shares Personal Data with Société Générale Group to which Ayvens belongs, for internal administrative purposes, to fulfil a legal obligation, to enable us to comply more efficiently and more effectively with laws and regulations or for monitoring, control and reporting purposes. Generally, Personal Data of employees is not included, unless this is needed for the purposes as described in this Statement.

Access to Personal Data within Ayvens will be limited to those who need to know the information for their tasks in line with the purposes described in this Statement. Recipients will include your managers and their designees, personnel in HR, IT, Compliance, Legal, Finance and Accounting and Internal Audit. All personnel within Ayvens will generally have access to your business contact information such as name, position, telephone number, work location, work address and e-mail address.

Ayvens also shares Personal Data with third-party service partners or providers to facilitate services they provide to us, including core and non-core services such as:

- **Professional Advisors:** Accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in the country of your Ayvens entity. For instance by way of example: a local data specialist with whom we share a country's employee file (date of birth, role, department and working hours) to gather facts and figures on strategic workforce planning.
- **Service Providers:** Companies that provide products and services to Ayvens such as payroll, pension scheme, benefits providers; human resources services, performance management, training, expense management, IT systems suppliers and support; third parties assisting with equity compensation programs, credit card companies, medical or health practitioners, trade bodies and associations, and other service providers.
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over Ayvens such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
- **Corporate Transaction:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Ayvens business, assets or stock (including in connection with any bankruptcy or similar proceedings).

## 6. WHY PERSONAL DATA MAY BE TRANSFERRED TO THIRD COUNTRIES?

Ayvens is a global service provider that has clients and locations around the globe. For a list of the Ayvens affiliates and their locations, that jointly process and use Personal Data, see the language sign on the top right of this website.

The Personal Data we process in relation to your employment may be transferred to Ayvens organisations and our service providers in other countries than your country of residence. This allows us to act as a global enterprise. Some countries are considered to provide for an adequate level of protection of your Personal Data, according to EU standards. You can find a list of these 'adequate countries' [here](#). For the transfer of Personal Data to other countries, Ayvens has put in place adequate measures to protect your Personal Data, such as Standard Contractual Clauses. You may obtain a copy of these measures by contacting us using the address in the "Contact Us" section below or by following [this link](#).

## 7. WHO WE DISCLOSE YOUR DATA TO?

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To respond to requests from public and government authorities;**
  - These can include authorities outside your country of residence.
- **To cooperate with law enforcement;**
  - For example, when we receive law enforcement requests and orders;
- **To enforce our terms and conditions;** and
- **To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.**

## 8. DO WE USE YOUR DATA FOR OTHER PURPOSES?

We may also use your Personal Data for a purpose other than the initial purpose. This is subject to the condition that the secondary purpose is in line with the initial purpose. The following factors are inter alia taken into account: are the purposes clearly related; is the secondary purpose appropriate and/or expected, was the Personal Data obtained directly from you or in another way; what kind of Personal Data is concerned for the secondary purpose; what would be the implications for you; and what data protection measures are applied when using your data for the secondary purposes.

It is generally permissible to process Personal Data for the following secondary purposes: transfer of the Personal Data to an Archive, internal audits or investigations, implementation of business controls and operational efficiency, IT systems and infrastructure related Processing such as for maintenance, support, life-cycle management, and security (including resilience and incident management), statistical, historical or scientific research, dispute resolution, legal or business consulting or insurance purposes.

## 9. HOW LONG WILL WE KEEP YOUR DATA?

Personal Data of employees will be kept for the period necessary to fulfil the purposes described in this Statement unless a longer retention period is required or permitted by law.

The criteria applied to determine the applicable retention periods are:

- the duration of your employment with the applicable Ayvens entity;
- as long as we have an ongoing relationship with you or your Dependents;
- as required by a legal obligation to which we are subject;
- and as advisable in light of our legal position, such as in regard of applicable statutes of limitations, litigation or regulatory investigations.

After the relevant retention period, Ayvens will securely delete or destroy or de-identify your Personal Data or transfer your Personal Data to an Archive, unless this is prohibited by law or an applicable records retention schedule.

#### **10. HOW DO WE SECURE YOUR DATA?**

Ayvens will take appropriate organizational, technical and administrative measures to protect Personal Data, in accordance with applicable privacy and data protection laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of Personal Data.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us in accordance with the “Contact Us” section below immediately.

#### **11. EMPLOYEE’S OBLIGATIONS**

Employees shall ensure that Personal Data is kept up-to-date and inform Ayvens of any changes to their Personal Data. You agree to inform your Dependents whose Personal Data you provide to Ayvens about the content of this Statement.

#### **12. CHANGES TO THIS STATEMENT**

We reserve the right to amend this Statement at any time in order to address future developments of Ayvens, or changes in industry or legal trends. The “Last Updated” legend at the top of this Statement indicates when this Statement was last revised.

#### **13. HOW CAN YOU CONTACT US?**

If you have questions, requests or complaints, please feel free to contact us via the contact page of the relevant Ayvens website or by sending an email message to [hrprivacy@ayvens.com](mailto:hrprivacy@ayvens.com).

Because email communication is not always secure, please do not include sensitive personal information in the emails you send us.

#### **14. HOW CAN I EXERCISE MY PERSONAL DATA RIGHTS?**

Please contact your local Human Resources representative if you have any questions or concerns about how Ayvens processes your Personal Data; if you would like to request to access, correct, suppress or delete Personal Data about you or request that we cease using it; or if you would like to request a copy or portability of your Personal Data. We will respond to your request consistent with applicable law.

Please note that we may not be required to comply (or fully comply) with your request. For instance, for as long as we have a relationship with you, or where personal data is kept in a backup system (for the purpose of restoring the data in case of a data loss event) and the data purging cycle may be different than applicable to the production system. In those circumstances, we will write to you explaining why we are unable to comply at that moment or, in the case of backup data, the request may be implemented at a later stage (when the backup is overwritten).

In your request, please make clear what Personal Data you would like to access or have changed or deleted, or otherwise let us know what limitations you would like to put on our use of your Personal Data.



For your protection, we only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. Please note that certain Personal Data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

You may also:

- Contact us at [hrprivacy@ayvens.com](mailto:hrprivacy@ayvens.com) with any questions about this Statement.
- Contact our Data Protection Correspondent via [this link](#).
- File a complaint if you believe Ayvens violates its Privacy Policy for the Management of Employee Data or your rights under applicable privacy and data protection laws and regulations.
- Lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct. Please see here a [link](#) to the national data protection authorities located in the European Union and the European Economic Area.