

TVG Zimsen ehf.

Privacy Policy – Employees

TVG Zimsen is committed to maintaining the reliability, confidentiality and safety of the company's employee personal data. This privacy policy describes TVG Zimsen's processing of your personal data.

This privacy policy applies to all our current and former employee's personal data. This privacy policy also refers to employees as "**you**", and to the company as "**us**".

If you are in doubt how this privacy policy applies to you, please contact the company's data protection team for more information using the contact information set out below.

1. Purpose and compliance with laws

TVG Zimsen is committed to comply with applicable data protection legislation at all times. This privacy policy is based on the Icelandic Act no. 90/2018 on the protection of privacy as regards the processing of personal data, ("**Data Protection Legislation**"), as amended.

2. What is personal data?

In this privacy policy, personal data is any information relating to an identified or identifiable individual, i.e. information that can be traced directly or indirectly to a specific individual. Anonymous data and information which does not relate to an identified or identifiable individual is not considered personal data.

3. Personal data collected and processed by TVG Zimsen

We collect and maintain different personal data about our employees. Different data may be collected on different employees and the processing and collection of personal data may depend on the nature of your position within TVG Zimsen.

The following are examples of data TVG Zimsen collects and processes on its employees:

- contact details, including name, ID number, address, telephone number and e-mail;
- job applications and references;
- information on education, training and work experience;
- employment contracts;
- information necessary for salary processing, including e.g. benefits, bank account information, wages and allowance;
- trade union membership and pension fund;
- performance reviews;
- work-related accidents;
- disciplinary measures;
- contact details of closest relative;
- time registration and absence;
- sick leave and holiday;
- e-mails on company owned e-mail addresses;

- internet usage;
- reasons for termination of employment;
- log-in data;
- information from vehicle tracking systems; and
- information from surveillance cameras.

In certain cases, in relation to specific positions within TVG Zimsen, the company may also collect and process information on criminal records.

Additionally, we may collect and process other information which you provide to us, as well as, in exceptional circumstances, information necessary for the company's business.

As a general rule we collect personal data directly from our employees. Where personal data is collected from third parties, we will endeavor to notify the relevant employees.

4. Why do we collect the personal data and on what grounds?

The personal data we collect about our employees are primarily processed for the performance of our employment contract with you, in accordance with a legal obligation/authorization, or based on the company's legitimate interests.

For the performance of the employment contract we process the following data:

- contact details, including name, ID number, address, telephone number and e-mail;
- job applications, references and data from job interviews;
- information on education, training and work experience;
- employment contracts;
- information necessary for salary processing, including i.e. benefits, bank account information, wages and allowance;
- disciplinary measures;
- performance reviews;
- sick leave and holiday; and
- time registration and absence.

Personal data processed for the performance of the **employment contract** are necessary for us to fulfill our obligations to you, and vice versa, e.g. for the purpose of salary payment or for evaluating your ability to perform specific tasks. An employee's failure to provide the necessary information may lead us to not being able to comply with our obligations, or may lead to changes of employees' tasks or his position within the company.

The company may also collect and process personal data on the ground of **legitimate interests**, such as for **security and property protection purposes**. This applies, for example, to the processing of material from surveillance cameras, information from vehicle tracking systems, e-mails and log-in data.

The company discloses your contact details and job title on the company's intranet, based on the company's **legitimate interests**, for employee communication purposes. We may also obtain your **consent** to disclose your birthday information on the company's intranet. We may also publish a picture of you on the

company's intranet, as well as in the company's e-mail system, based on the company's **legitimate interests**, both for communication purposes and security reasons.

Based on the **vital interests** of our employees and for security reasons, we ask for the contact details of your closest relative.

We process information regarding reasons for termination of employment on grounds of our **legitimate interests**, as well as such information might be necessary for us to be able **to exercise or defend a legal claim**.

Additionally, the company may under certain circumstances, process personal data in accordance with a **legal obligation**, such as in the field of employment and tax law. This applies, for example, to the processing of data on work-related accidents, and information on pension fund and trade union membership.

Where applicable, the company's processing of criminal records is based on the company's **legitimate interests** and, where applicable, in accordance with a legal obligation.

Where the collection and processing of personal data is based on your **consent**, you have the right to withdraw it at any time. All communications in relation to a withdrawal or changes of consent shall be directed to the company's data protection team.

5. Disclosure to third parties

TVG Zimsen may disclose employee personal data to contractors and other third parties in relation to their work for the company connected to the employment relationship. Personal data may also be disclosed to external parties which provide us with IT services and other services related to processing as part of the company's operation.

These third party service providers may be located outside of Iceland. TVG Zimsen will not transfer personal data outside the European Economic Area unless such transfer is permitted under applicable data protection legislation.

TVG Zimsen is part of a group of undertakings with establishments all around the world. The company may disclose your personal data to other companies within the group, to the extent that the company in question provides TVG Zimsen with its services, e.g. salary processing. The companies may be located outside the European Economic Area, but when TVG Zimsen transfers personal data to companies located outside the European Economic Area, TVG Zimsen will ensure that appropriate safeguards are provided, in accordance with applicable data protection law.

Your personal data may be disclosed to the extent permitted or required by applicable legislation or regulations, e.g. to the Administration of Occupational Safety and Health related to a work-related accident, to trade unions, customs authorities, pension funds or insurance companies. Your personal data may also be disclosed to third parties in order to comply with valid legal processes such as search warrants, subpoenas or court orders. Disclosure may also be necessary in emergency situations, to ensure the safety of the company's employees or third parties.

6. How do we protect and safeguard your personal data?

TVG Zimsen endeavours to take appropriate technical and organisational measures to protect your personal data, with special regard to the nature of the data. For example, TVG Zimsen has access controls to systems which store data about you. These measures are implemented to secure personal data against accidental destruction or alteration and against unauthorized access, duplication, use or disclosure.

7. Data retention

TVG Zimsen endeavors to retain your personal data only for as long as necessary in relation to the purpose for which they are processed, unless otherwise permitted or obligated by law.

8. Your rights regarding your personal data

You have the right to access and, in certain circumstances, to get a copy of the personal data undergoing processing, as well as information about the processing.

In certain instances, you may also have the right to have your personal data erased, or to have us restrict the processing. You also have the right to have your personal data rectified, if the data are wrong or inaccurate. It is therefore important that you keep us informed of changes of your personal data, as applicable.

You may also have the right to receive your personal data, which you have provided to us in a machine-readable format or the right to have us transmit those data directly to a third party.

When processing is based on our legitimate interests you can always object to the processing.

Your rights are however not absolute. Laws or regulations may authorise or oblige us to reject your request of exercising your rights.

9. Inquiries and complaints to the data protection authority

If you wish to exercise your rights described in section 8 or if you have any questions about this privacy policy or how we process your personal data, please contact the company's data protection team which will seek to answer any inquires you may have and instruct you on your rights according to this privacy policy.

If you are unsatisfied with our processing of your personal data, you are entitled to make a written submission to the Icelandic Data Protection Authority (www.personuvernd.is).

10. Contact information

TVG Zimsen's data protection team supervises compliance with this privacy policy. The team's contact information:

The company's data protection team: privacy@tvq.is

The company's contact information:

TVG Zimsen.
Korngörðum 2
104 Reykjavík

11. Revisions to this privacy policy

TVG Zimsen may make changes to this privacy policy to reflect changes to our legal or regulatory obligations or how we process personal data. If changes are made to this privacy policy, a revised version will be made available to employees or they will be notified in another verifiable manner.

Any changes to this privacy policy will be effective from the time the revised version has been communicated to our employees.

This privacy policy was published on July 9th, 2018.