

Stafa Group – GDPR Policy

Stafa Groups (STAFAs) main business is manufacturing sub-supply, product development/sales and property development/lease. Accordingly, we collect, treat and store a limited number of personal data. The personal data is used in connection with employment and statutory personal information as necessary for performing the company's day to day business according to laws and regulations and caretaking of its employees.

This document is addressing EU's General Data Protection Regulation (GDPR) effective 25 May 2018 and explains our policy for managing and controlling personal data as a data controller according to the GDPR regulation.

Personal data is any information relating to an identified or identifiable natural person; an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

1. Data controlling

The STAFAs Group is the "Data Controller" managing and controlling personal data in the group. The management of personal data in the daily business is executed by the STAFAs CEO and its subsidiaries Managing Director's and HR responsible's.

The STAFAs Group use a number of selected 3rd party system providers, "Data Processor's". Separate agreements with the Data Processor's are made to secure their compliance to the GDPR regulations.

The responsibility to oversee, control and maintain the GDPR system is delegated to the "Data Privacy Advisors" (DPA), one for the Norwegian subsidiaries and one for the Lithuanian subsidiaries, respectively. This delegation includes the tasks and duties, but not the end responsibility. The Data Privacy Advisors will also be the contact person for you ("Data Subject") in relation to the rights given to you by the GDPR regulation.

2. Personal data control principles

The processing of personal data at STAFAs shall follow the general principles below:

- **Lawfulness, fairness and transparency**
The processing of personal data at the STAFAs Group shall be lawful, fair and in a transparent manner to the data subject. Lawfulness in this connection means; - that the data subject has given consent, or - it is necessary for the performance of a contract, or - it is necessary for compliance with legal and statutory obligations.
- **Purpose limitation**
Personal data shall only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data minimisation**
Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy**
Personal data shall be accurate and, where necessary, kept up to date. Any inaccuracies must be fixed or removed without undue delay.
- **Storage limitations**
Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary.

- **Integrity and confidentiality**

Personal data shall be secured with an appropriated security solution, which shall protect against unauthorised or unlawful processing and against accidental loss or damage.

Personal data processed by STAFA is mainly used for administration of remuneration as salary and travel cost etc., for operational and organisational planning and HR related activities and responsibilities. Typical information is names, addresses, CV/applications, salary levels, positions, time registrations, tax info, access info, and other information connected with the employees job description, work schedule, employee development etc.

The Stafa Group conduct Employee Satisfaction Surveys and Customer Surveys regularly. Employee Satisfaction Surveys are anonymous.

Any collection and processing of personal data at Stafa Group WEBSites and Netshops are based on data subject consent and the above principles.

3. Your personal rights

You are entitled to request a report on what personal information we have about you by requesting a so-called registry extract. This can be made free of charge once a year. You also have the right to request that incorrect information about you shall be corrected, as well as the ability to request removal of your personal information. You have the right to withdraw your consent to processing of personal data and to prohibit the use of your personal information for direct marketing purposes.

To submit any request, please contact our Data Privacy Advisors for more information.

You have the right to submit eventual complains about processing of your personal data to the national supervisory authority.

4. Sharing of personal data

The STAFA Group shall not share personal data with any external party without prior consent from the data subject. Excepted is information necessary for compliance with legal and statutory obligations.

Internally, personal data information is shared within the Stafa group and with our system providers (data controller and data processors). The Data Processors are bound by a separate data processor agreement which regulate which information the data processor´s have access to and how the information shall be processed (in compliance with the GDPR regulations).

5. How to contact us

Stafa group Data Privacy Advisor - Norway/Sweden:

dpa@stansefabrikken.no

Stafa group Data Privacy Advisor - Lithuania:

dpa@stansefabrikken.lt

[2018.05.25 - Jon R. Westby/CEO](#)