Privacy statement

Skinney-Þinganes hf.

General

Skinney-Þinganes hf., national ID NO.: 480169-2989, of Krossey, 780 Höfn in Hornafjörður, cares about the privacy of individuals and takes privacy very seriously. Skinney-Þinganes attaches great importance to ensuring personal data are always handled in accordance with all data protection regulations in force.

What is personal information and the processing of personal information?

Personal information means any and all information which is traceable back to a given individual, such as name, national ID No., address, e-mail address, telephone number, financial information, health information, IP number, etc. A more detailed definition of personal information can be found in Article 3(1)(2) and (3) of the Data Protection Act.

Sensitive personal information means personal information subject to special protection under the Data Protection Act, i.e., information on ethnic origin or race, political or religious beliefs, trade union membership, genetics, health.

The processing of personal information means any and all types of handling and use of personal information, such as collection, registration, preservation, alteration or destruction. A more detailed definition of the processing of personal information can be found in Article 3(1)(4) of the Data Protection Act.

How does Skinney-Þinganes process personal information?

Skinney-Þinganes processes personal information on a lawful basis and in accordance with the Data Protection Act. Skinney-Þinganes also ensures that personal data are not processed to an extent incompatible with the original purpose of the processing. Skinney-Þinganes ensures that the following principles are adhered to:

- 1. Personal information must be processed in a fair manner.
- 2. Personal information will be collected only for a clear purpose.
- 3. No more personal information is to be collected than is necessary.
- 4. Personal information must be accurate and updated as necessary.
- 5. Personal information will not be kept for longer than necessary.
- 6. Appropriate precautions must be taken to ensure the security of personal information.

Automated decision-making

Automated decision-making is not involved in the processing of personal information by Skinney-Þinganes.

On whom does Skinney-Þinganes collect information?

Skinney-Þinganes's operations require the collection and use of personal information on various groups of individuals. The personal information held by Skinney-Þinganes may concern its staff, counterparties, customers and other third parties with whom it must work.

What personal information does Skinney-Þinganes collect?

Skinney-Þinganes collects various types of personal information on various groups of individuals, depending on the type of operations in question. Skinney-Þinganes seeks, in all circumstances, to collect only the personal data necessary in respect of the purpose of the processing.

In certain cases, we need to collect sensitive personal information, such as information on health and membership of trade unions. Special caution is exercised when handling such information.

Purpose of gathering personal information

Personal information is gathered in order to:

- discharge contractual obligations, e.g., in respect of staff.
- provide certain services, e.g., to customers and suppliers

- protect Skinney-Þinganes's legitimate interests.
- protect the legitimate interests of others.
- fulfil legal obligations.

Legal basis for the processing og personal data

Skinney-Þinganes collects and processes personal information on the following legal bases:

- to fulfil legal obligations.
- to fulfil contractual obligations.
- on the basis of individual consent.
- for projects in the public interest or in the exercise of official authority.
- to establish, exercise or defend legal claims.

How long does Skinney-Þinganes keep personal information?

Personal information held by Skinney-Þinganes is only stored for as long as it is necessary and after that we seek to securely delete the information. Material generated by electronic surveillance is kept in accordance with the rules laid down in rules no. 837/2006 on Electronic Surveillance.

From whom does Skinney-Þinganes collect information?

Skinney-Þinganes generally collects personal information directly from the individuals in question. It also uses public registers and information from other public authorities for the purposes of processing. If and when information is collected from other third parties, Skinney-Þinganes makes every effort to inform the individual in question thereof.

When does Skinney-Þinganes share personal information with third parties and why?

Skinney-Þinganes shares personal information with third parties contracted to work on a predetermined project, such as service providers, who are responsible for storing data, and contractors. In such cases, Skinney-Þinganes enters into a processing agreement with the party in question. Such agreements include provisions on the duty of the provider to follow the company's instructions on handling personal information. The provider may not use such information for any other purpose. In addition, the provider is under obligation to appropriately ensure the security of the information.

We also provide information to third parties when required to do so by law, for e.g., to the Directorate of Health, that is authorized to request information in accordance with the Medical Director of Health and Public Health Act No. 41/2007.

Transfer of personal data outside of the European Economic Area

Skinney-Þinganes is conscious that strict conditions apply to the transfer of personal information to countries outside the European Economic Area. Skinney-Þinganes does not perform such transfers under any circumstance, unless adequate authorisation exists in accordance with the Data Protection Act No. 90/2018.

Information security

Skinney-Þinganes endeavours to take appropriate technological and organizational security measures to ensure the security of personal information in accordance with the Data Protection Act No. 90/2018. One such measure is that only those staff who need personal information due to the nature of their work are granted access to such.

Webcams

Skinney-Þinganes's webcams are for security and asset protection only. To monitor the safety and supervision of work areas at each work site. Content generated by electronic monitoring is not shared with third parties. All electronic monitoring is in accordance with rules no. 847/2006 on electronic surveillance.

Individuals' rights

Individuals who have consented to the processing of certain personal information are entitled under the Data Protection Act to withdraw such consent at any time. The right to withdraw consent does not, however, affect the legitimacy of any processing performed before consent is withdrawn. Other rights include: the right to be informed about processing, the right to access to data, the right to have incorrect or misleading information corrected, the right to have personal information destroyed, the right to prevent the processing of the personal information and the transfer one's own information. It should be borne in mind that individuals' rights are not always unambiguous and may be subject to various conditions.

Skinney-Þinganes's contact information

Name: Skinney-Þinganes hf.

Address: Krossey, 780 Höfn in Hornafjörður

E-mail: <u>sth@sth.is</u>

Telephone: 470 8100

The right to file a complaint with the Data Protection Authority

If you suspect that Skinney-Þinganes is not handling personal information in accordance with the Data Protection Act, you have the right to report such to the Data Protection Authority (<u>www.personuvernd.is</u>).

Reviewing this Privacy Statement

Any changes made to this Privacy Statement will be announced on the company's website <u>www.sth.is</u>

Updated versions of this Privacy Statement enter into force upon publication.

Last updated: March 2022