

# PRIVACY STATEMENT

*Version 4.0 – Date: 21st October 2022*

## FOR USERS OF THIS WEBSITE

### 1. ABOUT THE TREATMENT OF DATA

The supplier takes your privacy seriously and will process your personal data in a secure, confidential and confidential manner. To ensure this in the best possible way, the Supplier has taken various technical and organizational measures, as well as established routines and processes to ensure that personal data is processed in a safe and legal manner.

The supplier's processing of your personal data is in line with current privacy legislation, including the current Norwegian Personal Data Act and the EU's General Data Protection Regulation (hereinafter "GDPR").

As data controller, the Supplier follows these principles for its processing of personal data:

- The processing is legal, fair, transparent and proportionate in relation to the purposes of the processing;
- The personal data is collected for specific, expressly stated and legitimate purposes, is adequate, relevant and limited to these purposes and is not further processed in a way that is incompatible with these purposes;
- The personal information is correct and updated as necessary and is stored so that it is not possible to identify the registered persons for longer periods than is necessary for the purposes of the processing;
- The processing is ensured with sufficient security for the personal data, and;
- The supplier establishes measures to secure the personal data against unauthorized access/disclosure/change/deletion.

### 2. WHAT PERSONAL DATA IS PROCESSED AND ON WHAT LEGAL BASIS

Personal information you leave to subscribe to our newsletter (name and email address) will be used to send you newsletters and/or information about courses and lectures Mindshift arranges.

We use personal information about you that you submit via our contact form (name and e-mail address) to contact you.

We use personal information about you that you submit via our contact form to register for a course (name, billing address, workplace and e-mail address) for invoicing and to send you course information.

### 3. SECURITY

The supplier has routines for internal control and information security in accordance with the current privacy regulations in Norway. The supplier also requires that the suppliers used process your personal data in a secure way, including that the Supplier sets requirements for information security and ensures that the transfer of data takes place in an encrypted and secure way.

The supplier will not sell, exchange or pass on your personal data to third parties beyond what appears in this privacy statement or another statement that has been drawn up specifically for the processing in question.

#### 4. PROVISION OF PERSONAL INFORMATION

The supplier does not share personal data with other actors, unless there is a legal basis for such sharing.

#### 5. INFORMATION CAPSULES – COOKIES

The service uses cookies (also known as "cookies"). These are text files that contain a small amount of information that is stored on your device and allows the service to perform various tasks, such as identifying you when you visit the service's website, allowing you to navigate between pages more efficiently, remembering your settings and preferences and, on a general basis, improving your user experience.

The service only uses necessary cookies, and these are the following:

Name of cookie	Purpose	Storage Time	Recipient
NID	Marketing	6 months	Google Analytics
OTZ	Analysis of visit	Up to 2 years	Google Analytics
_ga	Analysis of visit	Up to 2 years	Google Analytics
_gid	Analysis of visit	24 hours	Google Analytics
_pk_ses.8b1d4448-633f-4e56-9864-98f99e8f556d.31b7=*	Analysis of visit	29 minutes	Matomo
_pk_id.8b1d4448-633f-4e56-9864-98f99e8f556d.31b7=f101fc816e3a0323.1666675697.1.1666675705.1666675697.	Analysis of visit	29 minutes	Matomo
ppms_privacy_8b1d4448-633f-4e56-9864-98f99e8f556d={%22visitorId%22:%222b6254f1-2da9-491c-90a8-61c764227c2e%22%2C%22domain%22:%22normalized%22:%22www.mindshift.no%22%2C%22isWildcard%22:false%2C%22pattern%22:%22www.mindshift.no%22}%2C%22consents%22:%22analytics%22:%22status%22:-1}}%2C%22staleCheckpoint%22:%222022-10-25T05:28:17.525Z%22}	Privacy/consent	11 months	Matomo
_pk_ses.8b1d4448-633f-4e56-9864-98f99e8f556d.31b7=*	Analysis of visit	29 minutes	Matomo
_pk_id.8b1d4448-633f-4e56-9864-98f99e8f556d.31b7=f101fc816e3a0323.1666675697.1.1666675705.1666675697.	Analysis of visit	29 minutes	Matomo

You can control the Supplier's use of cookies yourself. In most browsers, you can delete cookies from your device's hard drive, block all cookies or receive warnings before a cookie is saved. You do this by accessing your browser's settings. If you choose to remove or turn off cookies on this website, this could have consequences for the website's functionality. For more information on how to manage cookies on your device, visit [www.cookiecentral.com](http://www.cookiecentral.com) or [www.aboutcookies.org](http://www.aboutcookies.org).

## **6. DELETION**

The supplier does not store personal data longer than is necessary. When the Supplier no longer has to process the personal data for the purpose for which it was collected, the Supplier will either delete or anonymise the personal data.

In accordance with the Accounting Act and the Bookkeeping Act, the supplier is obliged to store certain information, including your possible payment transactions, for five years after the end of the accounting year.

## **7. RIGHTS**

You have rights pursuant to the GDPR for how the Supplier can process your personal data.

# FOR USERS OF THE /UNLOCK SERVICE

## **8. ABOUT THE UNLOCK SERVICE FROM MINDSHIFT**

This document contains the Privacy Policy for /unlock (hereinafter referred to as "the Service"). The privacy policy describes and explains how personal data is processed in the Service.

The service is provided by Mindshift AS with org. no. 818 500 912 and business address Wergelandsveien 21B, 0167 Oslo (hereinafter "the Supplier"). The supplier offers a service that consists of investigations based on scientifically based methods, compilation and analysis of the results, as well as a report.

The business to which you are associated as an owner, employee or otherwise associated, has entered into an agreement with the Supplier regarding the use of the Service. The business is hereinafter referred to as the "Customer". You, as an end user of the Service, are referred to as "User".

The service consists of a solution for profiling and mapping behavior through surveys that are sent via email links. All regulations in this Privacy Policy apply to surveys from the Supplier, unless otherwise specified.

- The service involves the Provider sending out a link to surveys to the User, or to the customer who then forwards the link to the User. In some cases, the Provider will also distribute links to surveys to the general public, for example via social media. All the surveys are based on scientifically based models from both research and industry.
- The insights from the surveys can be used to prepare profiles and provide coaching advice/guidance for businesses, departments, teams or individuals. The insights from the surveys can also be combined with other data that the Customer has made available to the Supplier. If this is planned, clear and unambiguous information about this will be given in advance of the investigation. It will not be carried out if the user does not give consent to such processing.
- The service offers flexible surveys with a focus on a motivating and simple interface for a high completion rate and response rate. The surveys use statistical methods

continuously to increase reliability and validity. The surveys can be sent out separately as a "pulse survey", or included together with other modules in a more comprehensive survey that is sent out.

- The service is described in more detail on the Provider's website [www.mindshift/unlock.no](http://www.mindshift/unlock.no).

It is the supplier who is responsible for the processing of personal data that is necessary to deliver the Service to you as a User. This privacy policy contains information about how the Supplier processes your personal data and what rights you have as the registered person. If the Customer determines the purposes and means for how your personal data is to be processed, it is the Customer who is responsible for the processing, and you must therefore contact the Customer if you have questions about how your personal data is processed. If you have any questions about the Supplier's processing of your personal data, please contact the Supplier by sending an e-mail to [personvern@mindshift.no](mailto:personvern@mindshift.no).

## **9. ABOUT THE PROCESSING**

The Provider takes your privacy seriously and will handle your personal data in a secure, confidential, and discreet manner. To ensure this in the best possible way, the Provider has implemented various technical and organizational measures as well as established routines and processes to ensure that personal data are processed securely and legally.

The Provider's processing of your personal data complies with the applicable privacy legislation including the current Norwegian Personal Data Act and the EU General Data Protection Regulation (GDPR).

As the data controller, the Provider adheres to the following principles for its processing of personal data:

- The processing is legal, fair, transparent and proportionate in relation to the purposes of the processing;
- The personal data is collected for specific, expressly stated and legitimate purposes, is adequate, relevant and limited to these purposes and is not further processed in a way that is incompatible with these purposes;
- The personal information is correct and updated as necessary and is stored so that it is not possible to identify the registered persons for longer periods than is necessary for the purposes of the processing;
- The processing is ensured with sufficient security for the personal data, and;
- The supplier establishes measures to secure the personal data against unauthorized access/disclosure/change/deletion.

## **10. WHAT PERSONAL DATA IS PROCESSED AND ON WHAT LEGAL BASIS**

The supplier ensures that there is a legal processing basis for its processing of personal data.

The supplier uses the customer agreement with attachments as a processing basis for offering the Service to the Customer and consent as a processing basis for offering the Service to the User. The Supplier processes the personal data that is necessary to be able to perform the agreement with the Customer regarding access to and use of the Supplier's services and to offer information about our services, as part of entering into an agreement. In the agreement with the Customer, the Supplier is a data processor, and the Supplier

processes personal data in order to fulfill such data processor agreement and agreement with the Customer, i.a. to offer the necessary service and support if something is wrong with the Service from the Supplier. In the agreement with each User, called User Terms, it is stated which personal data the Supplier processes. The supplier typically processes personal data such as name, e-mail address and organizational affiliation.

The treatment basis may vary based on the purpose of the treatment. Some information must be processed by the Supplier because it is required by law, for example in connection with complying with the Supplier's accounting obligations. There may also be situations where the Supplier will process personal data because the Supplier has a legitimate interest in doing so, for example to be able to offer high security in the services the Supplier offers. The supplier may also request consent from the User, e.g. to send you newsletters by e-mail.

#### *10.2 Necessary processing of the User's personal data in accordance with the Terms of Use*

The service can be used by employees of the Customer or management at the Customer. In that case, the supplier processes your personal data in order to fulfill the agreement with you based on our Terms of Use, which you approve as a User when you start using the Service. In order to manage who is a User of the Service, we must process personal data in the form of the User's name and email address. We will also process other personal information that the individual User chooses to provide about themselves when using the Service, and we encourage each User to only provide personal information about themselves and not sensitive information.

#### *10.3 Targeted surveys*

When you complete the targeted surveys that the Service offers, the Provider will be able to process certain personal data about you. As the surveys may contain free text fields, personal information may appear there as well. In general, the Supplier will limit the processing of personal data by editing or removing unnecessary personal data.

#### *10.4 Consent is used for several purposes*

The supplier uses consent for several processing activities where appropriate. The supplier has a declaration of consent that the individual can use to give consent. Each consent can be withdrawn as easily as it was given. The supplier requests consent to processing for e.g. a) limited profiling (to be able to offer the Customer concrete coaching advice and other measures from the Supplier's advisors), b) to de-identify data (such "big data" is then used for various analyzes offered to third parties), and c) to send you e-mail (newsletter about the Service and other offers from the Supplier).

If you contact the Supplier by e-mail, it is considered consent to the Supplier being able to process your e-mail address, name and any other personal information you choose to include in your enquiry, if it is relevant for answering the enquiry. The supplier's processing basis for such activities is consent. When you choose to contact the Supplier, it is considered consent that the Supplier can carry out the necessary processing to assess your inquiry and contact you regarding your e-mail. The same applies if you contact the Supplier by telephone or in any other way which means that the Supplier, among other things, must process certain personal data about you.

## **11. SECURITY**

The Provider has routines for internal control and information security in accordance with current privacy regulations in Norway. The Provider also requires that the suppliers used process your personal data in a secure manner, including demanding information security and ensuring that data transfer occurs in an encrypted and secure manner.

The Provider will not sell, exchange, or pass on your personal data to third parties beyond what is stated in this privacy statement or another statement prepared specifically for the particular processing.

## **12. DISCLOSURE OF PERSONAL DATA**

The Provider does not share personal data with other actors unless there is a legal basis for such sharing.

In some cases, we must share your personal data with third parties to fulfill a contract, to comply with a legal duty (reporting requirements, etc., to public authorities) or with third parties you have consented to. To provide the Service, the Supplier uses surveys set up in a third-party tool. The Supplier makes the survey available either directly to the users that the Customer specifies to the Supplier, or to the Customer so that the Customer themselves makes the survey available to desired users. Information collected from the surveys forms the basis for the profiling that the Supplier performs based on the responses from the survey. The Supplier does not share raw data (individual responses) from the surveys with the Customer, and the Supplier is responsible for processing the Supplier's profiling. The Supplier delivers the finished profiles (which are based on individual responses from the survey) to the Customer. It is the Customer who is responsible for processing the profiles of the users, and the Supplier is a data processor for the Customer in this relationship. As part of the agreement with the Customer, the Supplier's standard data processing agreement is used, which ensures that personal data is processed in accordance with data protection regulations. The Supplier uses subcontractors to provide the Service to Users

- The subcontractor Typeform SL has developed the digital solution for the surveys and is the Supplier's data processor to the extent that Typeform SL processes personal data available via the Service. The Supplier has entered into a data processing agreement with Typeform SL in accordance with the GDPR. Typeform SL has intellectual property rights to the digital platform which the Supplier has the exclusive right to offer to dealers, customers, and users.
- The Supplier uses a standard cloud service with secure storage from Microsoft Azure for data collected, aggregated, and stored in the Supplier's own systems. All data stored in the Service is stored in Azure. All data in Azure is stored in Azure's data centers in Western Europe.

## **13. COOKIES – INFORMATION CAPSULES**

The Service uses cookies (also known as "information capsules"). These are text files containing a small amount of information that are stored on your device and allow the service to perform various tasks, such as identifying you when you visit the service's website, allowing you to navigate between pages more efficiently, remembering your settings and preferences, and generally improving your user experience.

The Service uses only necessary cookies, which are as follows:

Name of cookie	Purpose	Optional	Storage Time	Recipient
rl_page_init_referring_domain	Survey in Typeform		11 months	domain.typeform.com
rl_page_init_referrer	Survey in Typeform		11 months	domain.typeform.com
rl_group_trait	Survey in Typeform		11 months	domain.typeform.com
rl_group_id	Survey in Typeform		11 months	domain.typeform.com
rl_trait	Survey in Typeform		11 months	domain.typeform.com
cf_bm	Survey in Typeform		29 months	domain.typeform.com
rl_anonymous_id	Survey in Typeform		11 months	domain.typeform.com
rl_user_id	Survey in Typeform		11 months	domain.typeform.com
AWSALBTGCORS	Survey in Typeform		5 days	domain.typeform.com
AWSALBTG	Survey in Typeform		6 days	domain.typeform.com

You can control the Provider's use of cookies yourself. In most browsers, you can delete cookies from your device's hard drive, block all cookies, or receive warnings before a cookie is stored. This can be done by accessing your browser's settings. If you choose to remove or disable cookies on this website, it may affect the functionality of the site. For more information on how to manage cookies on your device, visit [www.cookiecentral.com](http://www.cookiecentral.com) or [www.aboutcookies.org](http://www.aboutcookies.org).

#### 14. DELETION

The Provider does not store personal information longer than necessary. When the Provider no longer needs to process the personal data for the purpose they were collected for, the Provider will either delete or anonymize the personal data.

#### 15. RIGHTS

You have rights as provided by the GDPR regarding how the Provider can process your personal data. Any consent you have given to the Provider can be withdrawn at any time. This is done by contacting the Provider at the email address [personvern@mindshift.no](mailto:personvern@mindshift.no). Withdrawal of consent does not affect the legality of processing based on consent before its withdrawal. You have the right to access the personal data the Provider has stored about you under GDPR Article 15, the right to request correction of incorrect personal data the Provider has stored about you under GDPR Article 16, the right to request deletion under GDPR Article 17, and the right to request that processing be limited under GDPR Article 18. If the conditions of GDPR Article 20 are met, you also have the right to data portability. If you have questions or objections to how the Provider processes your personal data, please contact [personvern@mindshift.no](mailto:personvern@mindshift.no). It is also possible to file an official complaint with the Data Protection Authority if you believe the Provider's processing of your personal data is contrary to the applicable Personal Data Act or GDPR.

#### 16. CONTACT THE PROVIDER

You can contact the Provider at any time regarding your privacy and the Provider's processing of your personal data at [personvern@mindshift.no](mailto:personvern@mindshift.no).