

Policy	Personal Data Policy - Employment
Date	18.09.2024
From	Mette Trandbohus, General Counsel, Attorney
To	Employees of the Stiesdal Group

Introduction

As part of your employment with the Stiesdal Group (the Stiesdal A/S parent company and Stiesdal Offshore A/S, Stiesdal Storage A/S, Stiesdal SkyClean A/S, Stiesdal Hydrogen A/S) we process personal data about you.

The purpose of this Personal Data Policy – Employment is to describe how your personal data is processed as part of your employment and what rights you have as a data subject.

Data protection

We are firmly committed to data protection and to secure confidentiality.

The company within the Stiesdal Group where you are employed is the controller of your personal data and is responsible for ensuring that your personal data during your employment is processed in compliance with the General Data Protection Regulation (GDPR).

We process your personal data in accordance with the following articles of the GDPR: article 6, section 1 (b), e.g. performance of a contract with the employee, article 6, section 1 (c), e.g. legal obligation, and article 6, section 1 (f), e.g. legitimate interests in relation to the before mentioned purposes. In some cases, and only when required for certain explicitly stated and limited purposes, the Group will seek your consent in order to process your personal data, in which case the processing will be based on article 6, section 1 (a) or article 9, section 1 (a) of the GDPR. If you subsequently withdraw your consent, this will only apply from the time of such withdrawal. Consequently, it will not affect the lawfulness of our processing of the data up to the time of withdrawal. Your civil registration number is processed in accordance with section 11 of the Data Protection Act.

Mette Trandbohus, General Counsel of Stiesdal A/S is responsible for ensuring that rules and procedures regarding processing of personal data are observed on an ongoing basis.

If you have questions regarding the processing of personal data, please contact:

Mette Trandbohus, General Counsel, Attorney
Phone: 20909434
E-mail: mgt@stiesdal.com

Types of personal data processed during employment

We typically process the following personal data during your employment:

- Master data, including name, address, date of birth, telephone number, e-mail address, civil registration number (CPR), Salary conditions and account number
- Data included in your CV, such as education(s) and career history
- Personality tests
- Residence and work permit
- Next of kin
- Reprimands, warnings, etc.
- Working hours
- Data collected or disclosed as part of our business operations, such as use of IT systems, access to our locations and reports filed under the whistleblower scheme (please see the Stiesdal Whistleblower Policy for more information).

On a case-by-case basis we may also need to register the following personal data about you:

- Health data
- Trade union affiliation

Generally, we process personal data to ensure that we meet our obligations towards you under the employment contract and the legislation we are bound to comply with. You can read more about the purpose of processing the individual categories of data below.

We do not process the following personal data about you, subject to such data being disclosed as part of a whistleblower report:

- Race or ethnic origin
- Political, religious, or philosophical beliefs
- Health or genetic data, except as outlined above
- Biometric data for identification purposes
- Sexual relations or orientation

Master data

In connection with your employment and the ongoing employment relationship, we process a variety of master data about you to meet our obligations towards you under the employment contract.

Data in your CV

During your employment, we will process the personal data provided in your application, CV and any other attached documents as well as any personal data you provided to us during your interview. Furthermore, we process a variety of master data about you to meet our obligations towards you under the employment contract.

Personality test

If you have consented to complete a personality test in connection with the recruitment process, we will process the results we received from the personality test during your employment and use it in the ongoing feedback dialogue we have with you.

Residence and work permit

If, due to your citizenship, you need a work and residence permit to work lawfully in Denmark, we will also obtain a copy of your work and residence permit from you. We do this both in connection with your employment as well as when your work and residence permit need to be extended.

Data about your next of kin

We register the contact details for the persons you have designated as your next of kin to ensure that we can get in contact with them in the event of an accident, sudden illness or the like at work.

Reprimands, warnings, etc.

If, during your employment, we receive any complaints about you or if you receive any oral or written reprimands or warnings, we will store data about such events.

Working hours

During your employment, your working hours should be documented in a time registration system. The purpose is to ensure that rules on rest periods and the maximum working hours are observed by Stiesdal, based on a consideration of the employee's protection.

Health

In connection with sickness absence during your employment, it may be relevant to obtain medical certificates, including fitness-for-work certificates pursuant to section 36a of the Sickness Benefits Act, perform sickness interviews pursuant to section 7a of the Sickness Benefits Act or obtain material from your municipality of residence in connection with any sickness benefits case. In such situations, we may receive and process personal data about your health.

We process such health data in accordance with sections 7(1) and 12 of the Data Protection Act as the receipt of these data is required to determine our legal position in relation to the Sickness Benefits Act and employment law rules, including for example, the Salaried Employees Act and the Act on Prohibition against Discrimination.

Trade Union Affiliation

In connection with employment-related matters for which you ask your trade union to assist you, we will be informed about your trade union affiliation.

Data collected as part of our business operations

We have implemented the below data control measures as part of our business operations, and we will process personal data about you as part of these measures.

Use of IT systems

In connection with our control of the use of IT systems, including internet and e-mails, we process data about you. If your job function is comprised by these rules, we register data about your use of the company's IT systems, including internet and e-mails.

The purpose of registering your use of IT systems is to ensure IT security in relation to our systems as described in the IT security policy. In the event of specific suspicions, we may also use data from the IT systems for control purposes, and data from the IT system may thus be used in the event of a personnel matter involving you.

You can read more about the personal data we process about you in the IT policy, which is available on the Intranet.

Access control

In connection with your employment, you will be provided with an access card for the workplace. The access card gives you access to our offices, comprising the canteen, printers, test and production facilities.

The purpose of the access control is to protect our own confidential information, including trade secrets as well as the confidential information of our business partners and personal data of our employees. In the event of specific suspicions, we may also use data from access card logs for control purposes. Data from access card logs may also be used in the event of a personnel matter involving you.

You can read more about the use of access control in the Management System.

Whistleblower

In connection with reporting of any concerns, such as bullying and harassment, inappropriate relationships, conditions contrary to our values, cases in violation of applicable law and other situations that are considered abusive during your employment, processing of personal data may take place if necessary to handle reports received under Stiesdal's whistleblower scheme. For further information please see Stiesdal - Whistleblower Policy.

Use of photos

Your portrait will be used on our intranet and on your ID card to identify you for security reasons when working at our different sites.

For employees in certain positions, it may be relevant to use their portraits on our website to ensure that our customers and collaboration partners can identify them. If relevant to you, we will obtain your consent thereto.

Some employees appear in our marketing materials or on our Social Media profile. If relevant to you, we will obtain your consent thereto.

In addition, we use situation photos from company events, on which you may appear, for example on the Intranet in the period after an event. We use such photos, without obtaining your consent, to document our history.

Travel activities

In connection with business trips matters within Denmark and abroad (such as booking a flight or renting a car), it may be relevant to obtain passport number, driving license number and nationality.

CCTV system & Operational Tracking Cameras

In connection with the CCTV system installed at the company sites in:

- Vejlevej 270, 7323 Give
- Fruebjergvej 3, 2100 Copenhagen Ø
- Smidstrupsvej 445, 9760 Vraa

we register data about you. If your job function is covered by the company's CCTV system, we register data about your movements in the surveyed areas.

The general purpose of the CCTV system is crime prevention, including vandalism and pilferage, as well as to be able to document safety problems and accidents. In the event of specific suspicions, we will use data from the CCTV systems for control purposes, and data from the CCTV system may thus be used in the event of a personnel matter involving you.

We erase the recordings from the company's CCTV system no later than respectively 30 days for Vejlevej 270, 7323 Give and 24 hours for Fruebjergvej 3, 2100 Copenhagen Ø after the recordings were made unless storage for a longer period is necessary for the company's processing of a specific dispute.

Given the complex nature of the facility in Vraa, the CCTV system is implemented as a support measure for monitoring operations, enabling the early identification of safety hazards and production-critical incidents, including but not limited to leaks, spills, fires, and mechanical failures. This is particularly crucial during nighttime hours when staffing is limited to one or two individuals on duty. Everyone responsible for operating the facility in Vraa will have access to view the live camera feed from the control room in Vraa. The historical recordings will be processed by a third party (Agri Energy Vrå P/S).

We erase the recordings from the company's CCTV system in Vraa no later than 5 days after the recordings were made unless storage for a longer period is necessary for the company's processing of a specific dispute.

In connection with the construction of the facilities and structures, we may install operational tracking cameras, for a limited period, to document the construction and installation process. The purpose is to obtain data from which we can learn from and use in future installations of sites. The raw (data) recordings will be processed by a third-party using artificial intelligence to scrub any personal data from the footage for Stiesdal's use. It requires 3-6 months to train the program to automatically remove the personal data, after which the scrubbed footage will be sent to us for analysis. We do not have access to the raw data, and it will be automatically deleted from the third-party's encrypted cloud server within 30-day cycles.

Recipients of personal data

During your employment we will pass on your personal data to the following recipients to fulfill our employment relationship with you:

- Public authorities, such as SKAT, Virk.dk, NemRefusion, Feriekonto, Lønmodtagernes Feriemidler, the Occupational Injury Agency
- Data processors, such as Welcon, VISMA/Dataløn, DatalønTid, DBO, EY and external legal counsels
- Other data controllers, such as PFA
- Preferred travel agency of Stiesdal when required in connection with business trips

Further, we may pass on your name, company email address, education and experience to our contractual partners. We will do so upon the request of our contractual partners to know the skillsets of our employees who will perform engineering services for them. Our contractual partners may reside inside as well as outside the EU and EEA.

We will not in other circumstances pass on your personal data to recipients outside the EU and EEA.

During your employment or in connection with the termination of your employment, we may also pass on your personal data to our external legal advisor.

Protection and security of personal data

To protect your personal data from being accessed by unauthorized persons, we process your data on a restricted SharePoint site with limited access for HR and Legal.

We have established an IT Security and Data Protection Policy, available on the Intranet, to ensure accessibility, integrity and confidentiality on information stored on the Groups IT systems.

We have also established a Personal Data Breach Notification Procedure, available on the Intranet, to be followed in the event of a security breach.

Duration of storage of personal data

The personal data we have processed about you in connection with your employment, will be stored in your personnel file on a restricted SharePoint site.

Storage will take place for, and during, the ongoing employment relationship and for up to five years after termination of your employment, unless it is necessary to store the data for a longer period of time. For example, in connection with work-related injuries or for purposes of defending any legal claims.

However, we will erase the results of your personality test, CV, Next of Kin data at the latest 3 months after termination of your employment.

We have established a Retention and Deletion Policy of the Group, available on the Intranet, in order to demonstrate the deletion requirements that we are subject to under the General Data Protection Regulation (the "GDPR").

Your rights as a data subject

Under the GDPR and the Data Protection Act you have the below rights in relation to our processing of your personal data as part of your employment. If you want to make use of these rights, please contact HR.

Your rights may in specific cases be limited e.g. due to the privacy of other persons, to protect business secrets and intellectual property rights.

Upon your inquiry in relation to your rights as a data subject, we will investigate whether the conditions are met and, in that case, take your inquiry into account as soon as possible.

Right to access

You have the right to access the personal data we process about you as part of your employment.

Right to correction

You have the right to have incorrect or misleading data about yourself corrected.

Right to deletion

In special cases, you have the right to have personal data about you deleted before the time of when our general storage of your personal data comes to an end.

Right to restrict

Under certain circumstances, you may also have the right to restrict the processing of your personal data.

You should be aware that objection to the processing of your personal data as outlined above may have consequences for your recruitment process if we are unable to properly assess your qualifications and suitability for the job position in question.

Right to object

Under certain circumstances, you have the right to object to our otherwise lawful processing of your personal data.

Right to transmit data

Under certain circumstances, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to have this personal data transferred from us as a data controller to another data controller without hindrance.

The Danish Data Protection Authority

You may contact the Danish Data Protection Authority for further information if you are unable to resolve your issues directly with us and you may file any complaints regarding our processing of your personal data to the Data Protection Authority:

Datatilsynet
Carl Jacobsens Vej 35
2500 Valby
Phone: +45 3319 3200
Email: dt@datatilsynet.dk.

You may find further information regarding your rights as a data subject in the Danish Data Protection Authority's guidelines available on the website: www.datatilsynet.dk.