



# Global Employee Privacy Policy

FCO-POLICY-GEPP REVISION: 00 REV. DATE: 2018-05-24

## Introduction

At OSM Maritime Group we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that OSM Maritime Group collects from or about you, and how we use and to whom we disclose that information.

## Application

OSM Maritime Group is a group of companies with operations both inside and outside of Norway.

OSM Maritime Group has adopted a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals and specific issues relating to the use of our website.

This Privacy Policy applies to the personal information of all individuals who seek to be, are, or were employed by OSM Maritime Group (collectively, an "employee"), unless the personal information is collected, used or disclosed while using the OSM Maritime Group website. This personal information is dealt with in the OSM Maritime Group ["Website Privacy Statement"](#).

## Organizations Covered by this Policy

This policy covers all personnel employed by OSM Maritime Group companies, onshore or onboard the vessel/units managed by OSM. The OSM Maritime Group business unit where you are employed is the controller of the personal data processed during the course of your employment and following termination.

For some activities related to your employment, other business units in the OSM Maritime Group is the controller of such processing to the extent it determines the purposes and means for the processing. For the purposes of this Policy/Notice, the term "OSM", "we", "us", "our" and like terms shall refer to the relevant OSM Maritime Group business unit being the controller of the personal data in question.

## Policy of Compliance

It is OSM Maritime Group's policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and / or an individual's right to privacy are different from one jurisdiction to another.

This Privacy Policy was developed to guide the activities of OSM Maritime Group. In addition, specific privacy practices may be adopted to address the specific privacy requirements of particular jurisdictions.

This Privacy Policy has a limited scope and application and the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact the office of our Group Privacy Officer for more information (see contact details below).



# Global Employee Privacy Policy

FCO-POLICY-GEPP REVISION: 00 REV. DATE: 2018-05-24

## What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

## What Personal Information we collect and how we use it

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were employed by us, including the personal information contained in:

- resumes and/or applications;
- references and interview notes;
- photographs and video;
- letters of offer and acceptance of employment;
- mandatory policy acknowledgement sign-off sheets;
- payroll information; including but not limited to social insurance number, pay cheque, and deposit information;
- wage and benefit information;
- forms relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short and long-term disability, medical and dental care; and
- beneficiary and emergency contact information.

In addition to the examples listed above, personal information also includes information such as name, home address, telephone, personal email address, date of birth, employee identification number and marital status, and any other information necessary to OSM's business purposes, which is voluntarily disclosed in the course of an employee's application for and employment with OSM Maritime Group.

As a general rule, OSM collects personal information directly from you. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources.

From time to time, we may utilize the services of third parties (including companies within OSM Maritime Group) in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements. In such a case, we will endeavor to not disclose more personal information than is required under the circumstances;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;



# Global Employee Privacy Policy

FCO-POLICY-GEPP REVISION: 00 REV. DATE: 2018-05-24

- as part of OSM's regular reporting activities to other companies within OSM Maritime Group (including outside of your home jurisdiction);
- to protect the rights and property of OSM Maritime Group;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent where such consent is required by law.

## Why Do We Collect Personal Information?

The personal information collected is used and disclosed for our business purposes, including establishing, managing or terminating your employment relationship with OSM. Such uses include:

- determining eligibility for initial employment, including the verification of references and qualifications;
- administering pay and benefits;
- processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- gathering evidence for disciplinary action, or termination;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labour or employment statutes;
- compiling directories;
- ensuring the security of company-held information; and
- such other purposes as are reasonably required by OSM.

## Legal basis for processing

The legal basis for processing personal information of our employees and potential employees is that it is either necessary for taking steps prior to entering into an employment contract and for performing an agreement with the employee (cf. GDPR article 6 no. 1 b), that we are under a legal obligation to process personal information (such as in relation to applicable tax, social security and social protection law and labor law legislation, cf. GDPR article 6 no. 1 a) and sometimes we process personal information in order to achieve our legitimate interest in ensuring the purposes mentioned above (cf. GDPR article 6 no. 1 f). Further, we sometimes process personal information based on consent (cf. GDPR article 6 no. 1 a). This is for instance the case with regard to recruitment, where the potential employee may consent to OSM retaining information regarding the applicant for a period of time after the application.

The legal basis for processing information relating to union membership and health data is that the processing is necessary for the purposes of carrying out our obligations as an employer towards our employees and for exercising our or the employee's specific rights in the field of employment and social security and social protection law insofar as authorized by applicable law or a collective agreement pursuant to local law.

## Video Surveillance and Monitoring



# Global Employee Privacy Policy

FCO-POLICY-GEPP REVISION: 00 REV. DATE: 2018-05-24

The work output of OSM's employees, whether in paper record, computer files, or in any other storage format belongs to us, and that work output, and the tools used to generate that work output, are always subject to review and monitoring by OSM.

In the course of conducting our business, we may monitor employee activities and our premises and property. For example, some of our locations are equipped with surveillance cameras. These cameras are generally in high risk areas or plant sites. Where in use, surveillance cameras are there for the protection of employees and third parties, and to protect against theft, vandalism and damage to OSM's goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority. Pursuant to our Acceptable Use of Computer Systems, Equipment, Infrastructure and Internet Systems Policy, we have the capability to monitor all employees' computer and e-mail use.

This section is not meant to suggest that all employees will in fact be monitored or their actions subject to constant surveillance. We have no duty to so monitor.

The legal basis for such processing and monitoring is our legitimate interests in maintaining secure premises, facilities, services, equipment and processes and protecting our technology and IP. Further, the legal basis is that it is necessary for complying with legal obligations to which we are subject.

## **Transfer of personal information**

When sharing personal information to other parties as described above, we sometimes need to transfer personal data to a country outside the EEA in order to be able to fulfil one of the purposes set out in this Policy. As an example, we may need to transfer personal information to OSM business units outside the EEA in order to provide you employment or international assignments located outside the EEA.

We will not transfer personal information to a third country outside the EEA that does not provide adequate protection of personal information unless appropriate safeguards are adduced or the transfer otherwise takes place in accordance with applicable data protection legislation. Examples of such safeguards are Binding Corporate Rules, EU Standard Contractual Clauses or if the receiving party is certified under the EU-US Privacy Shield.

## **How is Your Personal Information Protected?**

OSM endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification, destruction or disclosure and all other unlawful forms of processing.

Access to personal information is strictly limited to personnel of OSM and its controlled business units and affiliates who have appropriate authorization and a clear business need for that data.

## **How Long is Your Personal Information Retained?**



# Global Employee Privacy Policy

FCO-POLICY-GEPP REVISION: 00 REV. DATE: 2018-05-24

Except as otherwise permitted or required by applicable law or regulatory requirements, OSM endeavors to retain your personal information only for as long as it believes is necessary to fulfill the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

Specific criteria for duration of data storage for each application used for processing personal data is defined in the "OSM Maritime Group Application Inventory" available on our Intranet Inside and upon request to our Group Privacy Officer.

## Your Rights as a Data Subject

You have the right to request access to and rectification of any information we have collected about you. To help us keep your personal information updated, we advise you to inform us of any changes or discrepancies. In some circumstances, we may not agree with your request to rectify your personal information and will instead append an alternative text to the record in question. You will be notified both when information is rectified and when not, and if so what the reason is for not obeying to your request.

You also have the right to erasure and restriction of processing in some instances. You may have a right to receive personal data concerning you in a machine-readable format and to forward the data to another party (data portability), provided that certain conditions are met.

You also have the right to object to the processing, including if the processing is for marketing purposes. In order to object to processing, please contact our Group Privacy Officer at [privacyofficer@osm.no](mailto:privacyofficer@osm.no).

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Group Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

To exercise your rights as a data subject, or if you wish to make a complaint regarding our compliance with this Policy, please contact our Group Privacy Officer (see contact information below). Requests should be filed in writing. Prior to fulfilling your request, we may request specific information from you to enable to confirm your identity and right to access as well as to search for and provide you with the personal information we hold about you. We may also ask you to specify the categories of personal data that you request access



# Global Employee Privacy Policy

FCO-POLICY-GEPP REVISION: 00 REV. DATE: 2018-05-24

to, the IT system in which the personal information is likely to be stored and the circumstances in which the information was obtained.

You have a right to complain to OSM regarding violations of your rights under applicable data protection law. Further, you have a right to complain to the supervisory authority competent to resolve such concerns according to applicable law, but we encourage you to first contact our Group Privacy Officer before filing such complaint.

## Group Privacy Officer

We have appointed a Group Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Group Privacy Officer is as follows:

Yandoc, Ernesto Miguel Balen  
[privacyofficer@osm.no](mailto:privacyofficer@osm.no)

## Revisions to this Policy

OSM Maritime Group may from time to time make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information.

We will communicate any revised version of this Privacy Policy. Any changes to this Privacy Policy will be effective from the time they are communicated, provided that any change that relates to why we collect, use or disclose your personal information will not apply to you, where your consent is required to such collection, use or disclosure, until we have obtained your consent to such change.

This Privacy Policy was last reviewed **May 24th, 2018**.

## Interpretation of this Policy

Any interpretation associated with this Privacy Policy will be made by the Group Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'. This Privacy Policy does not create or confer upon any individual any rights, or impose upon OSM any rights or obligations outside of, or in addition to, any rights or obligations imposed by the privacy laws applicable to such individual's personal information. Should there be, in a specific case, any inconsistency between this Privacy Policy and such privacy laws, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

A handwritten signature in blue ink, appearing to read 'Geir Sekkesaether'.

Geir Sekkesaether  
CEO – OSM Maritime Group