

## PRIVACY POLICY HERJÓLF'S OHF

Vestmannaeyjaferjan Herjólfur OHF (hereinafter referred to as „**Herjólfur ohf**“ or „**The company**“) emphasizes personal protection and has dedicated itself to ensuring the reliability, confidentiality and security of the personal information that the company works with.

This privacy policy (hereinafter referred to as the “**terms**”) applies to the personal information that the company processes about customers and passengers of Herjólfur ohf, those who apply for a job with the company and other persons who interact with the company or visit its establishments (collectively referred to as “**registered persons**” or “**your**”)

If you have any questions about this Privacy Policy, please contact the Company. Contact information can be found further down in this policy.

### 1. Types of personal information that Herjólfur ohf processes

#### 1.1 Customers and passengers

The company needs to work with the personal information of customers and passengers who wish to travel with Herjólfur ohf. The processing is thus based on a contract, or a request to enter into a contract with the company.

The personal data processed are as follows: Grunnupplýsingar, þ.e. nafn (fornafn og eftirnafn), og fæðingardagur farþega

- Information about social security number and legal address, in which case the registered person books a trip through "my pages" / „log in“
- Details of vehicles requested to be transported, as applicable
- Information about the itinerary and, as the case may be, changes to the booking
- Contact details of the person booking the trip, i.e. email address and phone number
- Confirmation of acceptance of Herjólf's terms and privacy policy
- Booking confirmation timing

In the event of arrears, information about such arrears, billing history, etc. is processed.

#### 1.2 Individuals who contact the company

When a person contacts the company, it is necessary for the company to work with the person's contact information, depending on the circumstances, as well as copies of e-mails, online chats and other written communications, e.g. through social media.

This processing is based on the company's legitimate interests, to be able to communicate with the individuals who contact the company, whether it is in connection with inquiries, complaints or other forms of communication.

#### 1.3 Electronic Camera Surveillance

There are surveillance cameras on board Herjólfur ohf as well as at the company's premises. The camera monitoring is carried out for security and asset protection purposes and is based on the company's legitimate interests.

The monitored areas are specially marked with special signs.

## **1.4 Job applicants**

When a person applies for a job at the company, it is therefore necessary to work with the applicant's personal data. We work with a copy of the application and other information that the applicant chooses to hand over to the company. The company can also work with information from recommenders and public information, e.g. of the applicant's social media. This processing is based on the applicant's request to enter an employment contract with the company.

## **2. Disclosure to third parties**

The company may share your personal information with third parties in connection with their contractual relationship with the company. For example, the company may entrust IT providers to host the personal information that the company processes about you. The company may also receive assistance from recruitment agencies in connection with the application process and debt collection agencies. The company enters into appropriate agreements with such parties to ensure the security of the information that is processed.

It may also be necessary for the company to pass on information to insurance companies in connection with claims settlement, to the company's auditor and/or lawyers in connection with claims made and to investors in connection with a possible sale of the company.

Your personal information may also be provided to third parties, including to the appropriate authorities, to the extent permitted or required by applicable law or regulation or in response to legal action such as search warrants, subpoenas or court orders.

## **3. Security of the information processed**

The company strives to take appropriate technical and organizational measures to protect personal information with particular regard to its nature. These measures are intended to protect personal information against accidental loss or alteration and against unauthorized access, copying, use or disclosure. Examples of security measures taken by the company are access controls in the company's systems and premises.

## **4. Registered persons rights**

You have the right to get confirmation on whether or not we process personal information about you, and if so, you can request access to the information and how the processing is conducted. You may also have the right to receive a copy of the information. Under certain circumstances, you can ask the company that we send information that you have provided to us or that you have provided directly to a third party.

If the information we process about you is incorrect or misleading, you have the right to have it corrected. In certain circumstances, you can also request that personal data about you be deleted, for example when the retention of the information is no longer necessary based on the purpose of the processing or because you have withdrawn your consent to the processing of the personal data and there is no other authorization her.

In case you do not want to have your information deleted, e.g. because you need it to defend against a claim, but still don't want the information to be further processed by the company, you can request that their processing be limited.

If the processing of your personal information is based on the company's legitimate interests, you also have the right to object to that processing.

However, your aforementioned rights are not without priority. Thus, the law may oblige the company to refuse a request for deletion or access to data. Then the company can reject your request due to the company's rights, e.g. on the basis of intellectual property rights, or the rights of other parties, e.g. to privacy, if the company considers those rights to be more important.

In case of circumstances where the Company is unable to comply with your request, the Company will endeavor to explain why the request has been refused, subject to limitations based on legal obligations

## **5. Preservation of personal information**

The company preserves the personal data processed with registered persons for as long as necessary, taking into account the purpose for which it is processed.

Accounting data is preserved for seven years based on legal obligation. We also preserve information about bookings and related communications for four years in order to be able to make and, depending on the circumstances, avoid a claim. We preserve e.g. information related to freight transportation for four years, for the purpose of completing a freight booking and thereafter so that we can respond to claims, disputes or questions regarding the booking.

Personal information about applicants is retained for six months from the end of the recruitment process. Information collected through electronic monitoring is generally retained for 30 days, unless a longer retention period is necessary for the company to make or defend against a claim.

## **6. Information on communications and complaints to Personal Protection**

When Herjólfur ohf processes your personal data according to this privacy policy, Vestmannaferjan Herjólfur ohf., B ásaskerbrygju, 900 Vestmannaeyjum, is considered to be the "responsible party" in the sense of Act no. 90/2018 on personal protection and processing of personal data („**Icelandic Act on Data Protection and the Processing of Personal Data**“).

If you have a question regarding the company's processing of your personal information or if you want to exercise the rights stipulated in section 5 of this policy, you are asked to contact the company via [skrifstofa@herjolfur.is](mailto:skrifstofa@herjolfur.is) or by sending a letter to the company.

Your request must include the following information in order for the company to process it:

Your name, email address and/or other contact information.

Information about your request.

Information that makes it easier for us to find the information you are requesting, for example: booking number and dates (in the case of customers).

A copy of government-issued identification such as a passport or driver's license, so that we can confirm who is making the request.

Your signature and the date of the request.

If you are applying on behalf of another party, a signed power of attorney is required from the party.

You will not have to pay a fee for a request you make based on this policy, unless the request is manifestly unfounded or excessive. Herjólfur ohf will do everything in its power to respond to your request within 30 days of receipt.

If you are dissatisfied with the way the company handles your personal information and/or the way the company has handled your request, you can send a message to the Personal Protection Agency ([www.personuvernd.is](http://www.personuvernd.is)).

## **7. Modifications to this Privacy Policy**

Herjólfur ohf can make changes to this privacy policy so that it reflects how the company processes personal information at any given time.

Any changes that may be made to the policy will take effect after the updated version has been published on the company's website.

This Privacy Policy was updated on 17th of July 2024 [17.07.2024].