

PRIVACY NOTICE – NORMET SIMULATOR AND DIGITAL TRAINING

1 GENERAL

The purpose of this privacy notice (“Notice”) is to provide privacy information required by the EU General Data Protection Regulation (hereinafter "GDPR") to the data subject. Data subject means the private persons whose personal data is collected and processed, as defined in the GDPR.

2 THE DATA CONTROLLER AND CONTACT DETAILS

Normet Group Oy acts as the data controller in accordance with this Notice. Hereinafter “Normet”, “we, us, our” or “controller”.

The contact person of the controller and contact details in relation to customer and supplier data matters can be communicated in the initial phases directly through to privacyx@normet.com

3 THE NAME OF THE REGISTER

This notice describes the processing activities relating to **Normet simulator and digital training** services of Normet. Data subjects of this processing are the persons who participate in the Normet simulator or other digital training services offered by Normet to the employees, officers or directors of its customers, suppliers or other business partners. Reference to any customer, supplier or business partner includes our potential customers, suppliers or business partners (jointly “business partners”).

4 THE PURPOSE OF PROCESSING AND APPLICABLE LEGAL BASIS FOR PROCESSING

The following table provides a summary of the different purposes of use and the applicable legal basis as well as the categories of personal data being processed.

Purpose of Use	Legal Basis	Categories of Personal Data
Training	Legitimate interests of Normet	<i>Personal details:</i> name and contact details (email, phone number, address), education and age.
Evaluating performance and issuing certificates	Fulfilling a Contractual obligation	<i>Employment related information:</i> title, role, employer company.
Benchmarking performance against reference group(s)	Consent of the data subject	<i>Training related information:</i> training status, completed courses, ongoing courses, and their results and evaluation
Marketing		<i>Usage data:</i> data that the simulator or other digital

		training device creates when you are using the device.
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5 RETENTION PERIOD OR THE CRITERIA USED TO DETERMINE THAT PERIOD

The personal data will be processed for the duration of the business partner relationship or for as long as the person acts in a relevant position in the business partner.

Personal data may, however, be processed for longer periods if it is necessary in individual cases due to e.g. maintaining record of issued training certificates.

6 RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Subject to applicable laws, personal data may be transferred or disclosed within Normet Group to other group companies, some of which may be located outside the European Economic Area ("EEA"). Normet Group companies have entered into Data Transfer Agreement incorporating the EU Commission Standard Contractual Clauses (see further information at EU Commission's [website](#)).

In order to ensure the protection and security of data, the controller makes the appropriate contract required by the GDPR with the subcontractors used for processing data.

Normet may transfer or disclose personal data to EFNARC, Swedish Rock Engineering Association or other industry organizations issuing competence certificates.

Additionally, Normet may transfer or disclose personal data to authorities, where required to do so by applicable laws.

7 TRANSFERS OF PERSONAL DATA

We may use subcontractors in the processing of the personal data, some of which are located outside the EEA. Where personal data is transferred to subcontractors located outside the EEA, we will enter into a data transfer agreement incorporating the EU Commission Standard Contractual Clauses with the subcontractor (see further information at EU Commission's [website](#)).

In order to ensure the protection and security of data, we make the appropriate contract required by the GDPR with the subcontractors used for processing data.

8 SOURCES OF COLLECTING PERSONAL DATA

We collect personal data from the data subject in connection with the training and from our business partner that the data subject represents.

9 RIGHTS OF THE DATA SUBJECT

9.1 Right of Access and Data Portability

The data subject has the right to receive confirmation from us as to whether or not personal data concerning him or her is being processed, or whether personal data has been processed. Where we process personal data concerning the data subject, the data

subject has the right to receive the information contained in this document and a copy of the processed personal data. We may charge a reasonable administrative fee for any additional copies requested by the data subject. If the data subject makes the request by electronic, the information shall be provided in a commonly used electronic form, unless otherwise requested by the data subject. Furthermore, under the GDPR, the data subject may request the transmission of the personal data, which he or she has provided to the controller, to another data controller in a machine-readable format.

9.2 Right of Rectification, Right of Erasure and the Right to Object to Processing

The data subject also has the right to obtain from us the rectification or erasure of personal data concerning him or her and the right to prohibit the processing of personal data for direct marketing purposes. In certain cases, the data subject has also the right to request from us restriction of processing of personal data or otherwise object to processing.

9.3 The Right to Withdraw Consent

In situations where we process personal data of the data subject on the basis of his or her consent, the data subject has the right to withdraw his or her consent. The withdrawal of consent does not affect the legality of the processing that has happened prior to the said withdrawal.

9.4 The Right to Lodge a Complaint to the Supervisory Authority

In the case that the data subject finds the processing of his or her personal data unlawful, he or she has the right to lodge a complaint with a supervisory authority.

9.5 Using the Rights

All the requests mentioned here shall be provided to the above-mentioned contact person.

10 SECURITY OF PROCESSING

Only persons within the Normet group, whose employment tasks include responsibilities relating to the personal data, have access to the data and user rights for adding and modifying the information.

We arrange appropriate access control in our business premises. Work equipment, such as the computers are protected with, inter alia, password, firewall, regular security updates and SSL / encrypted connections. The storage of documentation containing personal data is securely arranged.