

PRIVACY POLICY

1. Purpose and scope of this statement

This Privacy Policy explains what personal data Ness, Risan & Partners AS and subsidiaries («NRP») collect from and about you, how we use the information and what we do to protect these data.

Personal data is information that can be connected to you as a person, such as name, e-mail address and telephone number. With «you» we include you as a current, former and prospective client, our client's employee or other relevant persons (contact persons, board members, beneficial owners), business relations and other persons with whom we may interact.

The Statement applies to all entities controlled by NRP. For an overview of the entities, please see www.nrp.no/Compliance/ and «Licenses and regulations». The data controller is the company with which you have entered into an agreement.

2. Contact Information

If you have questions or want access to the personal data NRP has about you, you may contact us by sending an e-mail to compliance@nrp.no. On the same e-mail address, you may also request rectification or erasure of personal data.

3. How we treat personal data

In order for NRP to provide our services, we are required to collect and process certain personal data about you. It is voluntary to submit such personal data, but if personal data is not submitted, NRP will be unable to provide our services. The data will primarily be collected from you, but other sources can also be used, such as public registry or the Internet.

Establishing a client relationship: We carry out client evaluations regulated by the Anti-Money Laundering legislation on the basis of a legal obligation.

Investment services: We have legal requirement by the Norwegian Securities Trading Act to obtain personal information and carry out a client suitability assessment before investment advice can take place. This includes collecting information about financial situation, personal relations, investment goals and risk appetite.

Client administration: We process personal data in order to meet the requirements of the agreement we establish with our clients. For corporate clients, we register name, phone number and email address of the contact person(s). For personal clients, we register name, phone number, address and email address.

Administration of suppliers and business relations: We collect and store personal data from our suppliers and business relations with the purpose of effectively be able to do business with each other. The collected information includes contact information such as name, job title, email address and phone number of contact persons.

4. Prospective clients

For prospective clients, we collect data for marketing purposes on the basis of legitimate interests for us to offer relevant products or services. If a client relationship is not established, or the client does not consent to store their data, the data will be erased within 12 months after collecting.

5. Cookies

NRP's web page www.nrp.no does not use cookies. NRP InvestorPortal (log-in services) uses certain cookies. For further information, see NRP's «[Cookie Policy](#)».

6. Logging and storing of communication

NRP Finans AS is as a regulated entity required to log and store all forms of client dialogue (phone calls and emails) when providing investment services to clients. The information compiled herein shall be documented in a durable medium. All phone calls with employees of NRP Finans are thus logged, (except for calls with individuals that are actively exempt by a NRP employee), and the calls are stored for 5 years before they are deleted. NRP has established internal instructions describing when and by whom logged calls can be replayed and listened to, that such listening shall be for a reason and pursuant to legislation. Emails are stored in the CRM-system and will be kept as long as necessary for compliance with statutory storage obligations.

7. Security

We are dedicated to avoiding unwanted and unauthorized access to your personal data. Therefore, we utilize access restrictions and various forms of security technology to provide protection against unwanted and unauthorized access and abuse of personal data. Our IT service providers have issued statements to NRP that their data processing is according to relevant legislation, including the Personal Data act. We have entered into data processing agreements with suppliers and other relevant business relations.

8. Record keeping and erasing

NRP will process and store your personal data for the duration of our business relationship.

Personal data about clients' contact persons will be erased five years after the client relationship is terminated.

Personal data collected pursuant to Anti-Money Laundering purposes will be erased five years after the client relationship is terminated.

Data regarding prospective clients who does not establish a client relationship will be erased as soon as the contact person withdraws their consent, or after 12 months with no activity.

9. Personal Data to third parties and cross border exchange

NRP will only forward personal data to third parties if it is required to pursue investment services NRP provide you as a client, or it is required by legislation.

For the pursuit of investment services NRP provides, this may encompass banks that finance our projects, sellers of real estate or vessels that NRP arranges, and others with business- or process critical requirements for information for us to arrange the projects.

Personal Data collected by NRP is stored in Norway. NRP Finans AS has a branch in Sweden, and employee in Sweden has access to relevant personal data from his office.

10. Your rights

You have the right to access, rectify and have erased the personal data NRP has collected about you. You also have the right to restrict NRP's use of the data, and protest against our usage. For certain data you have the right to have the data transferred to other parties (data portability).

We do not make automated individual decisions.

When our data processing is based on your consent, you are entitled to revoke consent at any given time.

NRP retains the right to refuse access, rectification and erasure if we are entitled by law to do so. Such refusal will be explained.

You have the right to complain to Datatilsynet (The Norwegian Data Protection Authority) if you claim that NRP processes your personal data in conflict with the regulation. We appreciate if you contact us first, so we can clear any potential misunderstandings.

Version applicable from: 30. September 2021