Privacy Statement

Telenor Eiendom Holding AS PRIVACY STATEMENT
Updated March 5th, 2019

**1. Introduction**
This privacy statement applies when using services provided by Telenor Eiendom Holding (from now on «Telenor Eiendom»). Services offered users of buildings Telenor Eiendom owns and manage. Examples of services are visitor registration, access control and CCTV. The purpose of the privacy statement is to inform you about how Telenor Eiendom processes your personal information and which rights you have in this regard.

The purpose of the services provided by Telenor Eiendom is mainly to ensure a simpler and safer workday for you as an employees or a visitor to a Telenor Eiendom building/site.

Telenor Eiendom is data controller for managing personal information collected through use of services we provide employees, tenants and users of our buildings. The daily data controller responsibility is mainly exercised by our partner and data processor ISS.

Please spend some time to make yourself familiar with our guidelines for privacy. Feel free to contact us if you have any questions. Contact information is to be found in bullet 3.

**2. Personal information about you handled by us**

2.1. Introduction
In the following we will give a general explanation regarding which personal information we collect, for which purpose and services this personal information is used and also the categories of third parties who have access to this information. We will also give an overview of deletion routines related to personal data.

Telenor Eiendom NEVER treat any of the following personal data: Special categories of personal data, including data related to race or ethnical background, or political, philosophic or religious opinion, information about legal offences, health information, sexual relationships or labor union trade memberships.

2.2. The purpose and legality of treatment of your personal information.

We treat your personal information to the extent necessary for you to be able to enjoy the services we offer employees, tenants and users of our buildings, and also to maintain and protect our provided services. The legal ground for our processing is legal obligation or legitimate interest, cf. Personal Data Act article 6.

2.3. Sharing personal information with others
We only share your personal data when we have legal grounds for sharing. We can share data with IT-vendors, tenants, Norwegian authorities, internal companies and credit rate companies. See further information in the table below.

2.4. Schematic overview of processing
Table below shows a generic overview over data collected and processed, whether shared with a third party and how long they are kept before deletion.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Name of processing activity** | **Processing purpose** | **Categories of personal data** | **Legal ground for processing** | **Deletion routines** | **Third party categories** |
| **Access control** | Administer and secure safe access to all  | Contact information, picture and registered information  | Legitimate interest | Registered information on access card is deleted after 90 days, access order information is deleted 1 year after end of employment  | Securitas, ISS, tenants, authorities, IT-vendors |
| **Canteen/ lunch settlement** | Administer lunch and cafe services to employees and tenants  | Contact information and location of work  | Contract | Deletion routines must be followed up, we have requested that information about who has bought what must be deleted  | ISS, IT-vendors |
| **Visitor registration** | Administer and secure safe access to buildings for visitors  | Contact information and location of work | Legitimate interest | Deleted 24 hours after visitation  | ISS, IT-vendors, tenants |
| **CCTV/Camera surveillance** | Physical security of property and building  | Video surveillance recordings and pictures  | Legitimate interest | Deleted 7 days after recording, or after 30 days if requested or possible police investigation  | ISS, Securitas, authorities, tenants, IT-vendors |
| **Mail distribution** | Administer mail and package delivery to tenants  | Contact information and location of work | Legitimate interest | Deleted 3 months after end of employment  | ISS, IT-vendors, tenants |
| **Archiving** | Informasjons-håndtering i forbindelse med leietakere | Contact information and contract location  | Legitimate interest | Personal data is deleted when the contract is terminated, except the content of the contract  | IT-vendors |
| **Compliance** | Secure compliance i whistleblowing cases | Contact information and employee information  | Legal obligation | Data is deleted locally when the case is completed  | IT-vendors, internal companies |
| **Lease contracts/rent out** | Administration of lease out contracts | Contact information and credit rating information | Legitimate interest | Personal data is deleted when the contract is terminated, except the content of the contract | Credit rate vendors, IT-vendors |
| **Invoicing** | Invoicing services | Contact information, payment information | Legitimate interest | Deletion according to legal obligation in «Bokføringsloven» | GSS |
| **Payments** | Accomplishment of payment | Contact information, payment information | Legitimate interest | Deletion according to legal obligation in «Bokføringsloven» | GSS |
| **Jeløy Radio kurs og konferanse-senter** | Arrangement of conferences, events and courses, including accommodation and food services  | Contact information, preferences, allergies and payment information  | Contract | All data is deleted one year after the completion of the arrangement/event | IT-vendors |
| **Parking** | Administration and security related to parking garage at Fornebu  | Contact information, payment information, parking admission  | Contract | Data is deleted immediately after entrance and control against parking admission  | Onepark and tenants |

**3. Your rights regarding management of personal information**

You have the following rights according to the Personal Data Act when we treat you personal information:

* You have the right to request access to your personal information according to the Personal Data Act, article 15.
* You have the right to request correction, deletion or restrict the management of your personal information according to The Personal Data Act articles 16, 17 and 18.
* You have the right to data portability wherever this is available according to The Personal Data Act article 20.
* You have the right to protest to our treatment of your personal information according to The Personal Data Act article 21. This will for Telenor Eiendom’s case say the activities based on legitimate interest.
* On request you have the right to get information regarding the balancing of interest done where treatment of personal information is based on legitimate interest.

You may contact Telenor Eiendom at GDPReiendom@telenor.com if you wish to exercise your rights as described above, or if you have other questions related to management of your personal information.

You also have the right to complain to The Norwegian Data Protection Authority if you think your rights have been injured by the use of personal information described in this document. Contact information to The Norwegian Data Protection Authority is: Datatilsynet, Postboks 8177, Dep 0034 Oslo, Email: postkasse@datatilsynet.no, Phone: +47 22 39 69 00.

**4. Security**
Telenor Eiendom take the security of personal information very seriously and protect the personal information we handle. When Telenor Eiendom store personal information, we use IT systems with limited access placed in facilities with measurement of physical security. Telenor Eiendom has gone through organizational, technical and administrative actions to protect personal information in the organization. Telenor Eiendom has taken the necessary steps to secure your personal information from loss, misuse, unauthorized access, change and publication.