

## PRIVACY POLICY

### 1. Purpose and scope of this statement

This Privacy Statement («the Statement») explains what personal data Ness, Risan & Partners AS and subsidiaries («NRP») collects from and about you, and how we use the data.

NRP use your personal data and is Controller pursuant to the prevailing and applicable data protection legislation in Norway, including (but not limited to) laws and regulations pursuant to the General Data Protection Regulation (EU 2016/679) («GDPR»). The regulation protects you against abuse of your personal data.

The Statement applies to all entities controlled by NRP. An overview of which entities are included in NRP and their activities, investments- and ancillary services, please see <http://www.nrp-finans.no/Compliance/> and «Licenses and regulations». Further, the statement applies to the personal data of current, former and prospective clients and business relations, visitors to our website [www.nrp.no](http://www.nrp.no) and NRP InvestorPortal, and other persons with whom we may interact.

To ensure that your personal data is processed in a safe and adequate way, NRP has established this Privacy Policy. The Privacy Policy is supplemented by internal instructions on handling of personal data, and data processing agreements with suppliers and other relevant business relations.

### 2. Personal data from registered Clients

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 the services. The basis for processing, the purpose of the processing, what type of personal data that are processed, and the source of the personal data, is described below.

NRP will process your personal data in order to:

- Fulfill the requirements set upon us according to the Act of June 1 2018 no. 23 on Anti-Money Laundering (Norw: «Hvitvaskingsloven») and pursuant regulations. Accordingly, NRP will inter alia process data like name, personal number, address, beneficial owners and ID's. The source of the data will primarily be yourself, however we reserve the right to collect information from public register's or the internet.
- Fulfill the requirements set upon us according to the Act of May 27 2016 no 14 on Tax Management (Norw: «Skatteforvaltningsloven») and pursuant regulations, including FATCA/CRS (see section 7 below). Accordingly, NRP will inter alia process data like name, citizenship, tax jurisdiction, beneficial owners and data about financial situation, including assets and liabilities. The source of the data will primarily be yourself, however we reserve the right to collect information from public register's or the internet.
- Fulfill the requirements set upon us according to the Act of June 29 2007 no 75 on Securities trading (Norw: «Verdipapirhandelloven») and pursuant regulations. Accordingly, NRP will inter alia process data about your investment history, experience and financial situation, including assets and liabilities. The source of the data will primarily be yourself, however we reserve the right to collect information from public register's or the internet.

- Fulfill the commitments in Client Agreement. The basis for processing is the personal data act (Norw: Personopplysningsloven §8a. Accordingly, NRP will inter alia process data about name, personal number and bank account number etc. The data will be collected from yourself when submitting the Client Agreement.

### **3. Personal Data from others, i.e. business relations that are not registered Clients.**

According to traditional business relations established over a prolonged time, NRP will collect and store personal data received from persons in meetings and other types of approaches, and store such data in our CRM system («CRM») with the purpose effectively be able to pursue the mutual business relationship on both an ongoing and a future basis. The data collected comprises, but may not be limited to: Name, company association, position, address data (including e-mail), phone number, time and place for meetings or other types of contact, and other information that the person has chosen to share with NRP. We maintain that we may reasonably expect that the person that has provided us with the information as described also accepts that we process and store the information such that we may offer you our services and perform our regular business operation.

### **4. Personal Data collected on [www.nrp.no](http://www.nrp.no) and NRP InvestorPortal**

NRP's web page [www.nrp.no](http://www.nrp.no) and logged-in site NRP InvestorPortal use cookies supplied by Google Analytics. For further information, see NRPs «Cookie Policy» available on those pages.

### **5. Logging of phone calls**

NRP Finans AS is as a regulated entity required to log and store phone calls when providing investment services to clients. 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 at a minimum 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 the Securities Act or other relevant legislation.

### **6. 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.

### **7. 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 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 that are processed pursuant to Skatteforvaltningsloven (re section 2) will be transmitted to the Norwegian Tax Authority. Since Norway has entered into bilateral and multilateral agreements regarding automatic exchange of information about financial accounts, such information may be forwarded to foreign tax authorities. The agreements in question are regularly named CRS (Common Reporting Standard) and FATCA (Foreign Account Tax Compliance Act).

Personal Data that are processed pursuant to Hvitvaskingsloven (re section 2) may be transmitted to ØKOKRIM (the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime), pursuant to NRP's reporting requirements pursuant to Hvitvaskingsloven § 18.

Personal Data may also be transmitted to legal authorities in other jurisdictions if required by law.

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

Except for those issues mentioned in this section, Personal Data will not be transferred cross border.

#### **8. Rectification and erasure of Personal Data**

NRP will process Personal Data about you as long as you remain a registered client. Personal Data that are processed pursuant to Verdipapirhandelloven (re section 2) will be stored for a minimum of 5 years after the client relationship is terminated. Personal Data processed pursuant to Hvitvaskingsloven (re section 2) will be stored for a minimum of 5 years after the client relationship has been terminated and be erased at the latest 1|0 years after the client relationship is terminated.

Other Personal Data will be erased when storage no longer is deemed necessary, except when various forms of legislation requires continued storage.

You have the right to access, rectify and have erased the Personal Data NRP has about you, pursuant to Personopplysningsloven, in particular §§ 18, 25 and 27. 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). NRP retains the right to demand a fair compensation for requests for access, rectification and erasure beyond what is required by law. NRP also retains the right to refuse access, rectification and erasure if we are entitled by law to do so. Such refusal will be explained.

If you want access to the personal Data NRP has about you, you may contact us by sending an e-mail to [compliance@NRP.no](mailto:compliance@NRP.no). On the same e-mail address, you may also request rectification or erasure of Personal data. You may complain to Datatilsynet (The Norwegian Data Protection Authority) if you claim that NRP processes your Personal Data in conflict with the regulation.

#### **9. Changes in the statement or instructions**

NRP will change or amend the privacy Statement or instructions regarding personal data if required in order to develop our services, or if required pursuant to changes in law or regulations. Updated Privacy Statement will be available at <http://www.nrp-finans.no/Compliance/>.

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