

# PRIVACY NOTICE

## Stimline AS

## Stimline Digital AS

## Stimline Well Intervention Systems AS

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*Last updated: Feb 6, 2025*

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### 1 OVERVIEW

This Privacy Notice ("**Privacy Notice**") is prepared by Stimline AS, Stimline Well Intervention Systems AS and Stimline Digital AS ("**Stimline**", "**we**", "**our**" or "**us**") to ensure that you receive the information we are required to provide to you, and which is necessary for you to exercise your rights under the General Data Protection Regulation (the "**GDPR**") and the Norwegian data protection legislation (together "**data protection legislation**").

We act as a data controller for the processing of personal data described in this Privacy Notice. This Privacy Notice describes how we process personal data, the purpose of our processing activities, and the legal basis for our processing activities. Furthermore, this Privacy Notice describes the data subjects' rights in connection with our processing of personal data and how you can exercise these rights.

In addition, this Privacy Notice describes how we use cookies on our website and in our IDEX customer software. Please see Section 4 below for more information about our use of cookies.

### 2 HOW DO WE COLLECT PERSONAL DATA?

Some of the personal data we process may be collected directly from you. This applies, for example, when you contact us and provide your contact information, when you subscribe to our newsletter, or when you register an account on the Stimline platform.

We are also collecting personal data automatically when you use our website or our platform through your device, browser, our log files and through cookies. Please see Section 4 below for more information about Stimline's use of cookies.

In addition, we may collect personal data from third parties, such as your employer when they set up an account on your behalf. We may also collect personal data from publicly available sources to administrate our business relationships.

### **3 HOW DO WE PROCESS PERSONAL DATA, AND FOR WHAT PURPOSES?**

This Section includes information about the personal data we process, the purposes of our processing of data and our legal basis for the different processing activities:

#### **Providing our website**

When you are visiting our website or IDEX customer system we collect information such as the IP-address, browser and device information, usage data (such as date and time the website was accessed), browsing activities (such as which parts of the website that was visited), performance data and metrics.

We process this personal data for the purpose maintenance and improvement. The legal basis for such processing is our legitimate interest in enhancing our offerings through our website.

#### **Providing the Stimline platform**

We process personal data about the individuals who have registered a user account and are using the Stimline platform. For example, Stimline uses personal data to provide authentication and authorization when users log into the IDEX customer platform, to provide certain platform features and to monitor technical systems and report and debug errors. Personal data processed to provide the Stimline platform to users include name, email address, password, application user ID and IP address.

Stimline processes personal data about individuals who have signed up for and use the Stimline platform pursuant to a contract between Stimline and the company to which the individual is affiliated (e.g. where the individual is employed). We process their personal data based on our legitimate interests in performing the relevant contract.

However, if a representative from a customer has mediated access to the Stimline platform to an individual outside the customer organization, we will process his/her personal data based on our legitimate interests in promoting our services towards such individuals, as well as our interest in providing our customers with this opportunity.

We also process certain personal data regarding users in furtherance of our legitimate interests in providing certain platform features, such as authentication and authorization when users log into the Stimline platform, in order to deliver a secure and high-quality service.

#### **Improving and developing the Stimline platform**

We process personal data to improve system operation based on usage and to enable product development and enhancements. For example, if we receive a feature request from a user or customer, we will store the request and the contact information of the sender to manage the feature request. The personal data processed in this respect include user ID, user activity and customer company name.

We process personal data for improvement and development purposes in furtherance of our legitimate interest in enhancing our offerings.

#### **To communicate with you**

We process personal data when you contact us with questions or comments by e-mail, chat, on social media or through our contact form. The personal data that we may process to communicate with you include e-mail address, phone number, job title, company name, any personal data included in your inquiry.

We process personal data to provide you with customer care and support based on our legitimate interest in administering and supporting our services.

### **Administration of business relationships**

We will process the personal data of representatives and contacts of our business partners, to administer our business relationships. For example, we will process personal data relating to the representatives and contact persons of our business partners when entering into an agreement or responding to their requests and questions regarding our service offerings. We will in this respect process personal data such as name, email address, signature and company name.

We process personal data about the representatives and contacts of our business partners to administer and fulfil any contractual obligations with them (e.g. registering a purchase). When not necessary to perform a contract, in furtherance of our legitimate interest in establishing and administering the business relationship we have with these persons, for example, in connection with responding to inquiries from potential customers.

### **To provide you with our knowledge articles**

We process personal data to provide you with our knowledge based on your consent which you provide to us when you subscribe to our knowledge articles. The recipients of our knowledge articles may terminate its subscription at any time by following the "unsubscribe"-information included in the newsletter emails or by contacting us as described below.

### **Marketing**

We may provide contact persons of customers with information about the Stimline platform, new products, campaigns and other business initiatives of Stimline. If the marketing recipient is a general point of contact not linked to a specific person (e.g. a general e-mail address such as *contact@company.com*), no personal data is processed. However, if the marketing recipient is a specific person, we may process personal data such as email address, application user ID and IP address.

We will only process personal data for marketing purposes if the recipient has consented to the relevant processing of personal data.

## **4 OUR USE OF COOKIES**

Cookies are small pieces of text used to store information on the user's web browser. They are widely used to store and receive information to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

The cookies we use allow us to collect information such as browser type, anonymous traffic data and IP address, and enable us to, for example, see how users navigate our website.

While the cookies that we use may change from time to time as we improve and update our services, we use them for the following purposes:

- **Necessary cookies:** These cookies are required for the operation of our platform and website. They ensure basic functionalities and security features, anonymously.
- **Analytical or performance cookies:** We use cookies to better understand how our services are used to improve them further. These cookies allow us to measure and improve the performance of our platform.
- **Functional cookies.** These are used to recognize you when you return to our platform. This enables us to, inter alia, personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Marketing cookies.** These cookies record your visit to our platform, the places you have visited and the links you have followed. We will use this information to make our platform, and the advertising displayed on it more relevant to your interests.

You may change your cookie preferences at any time by. You may also disable the cookies we use through the settings in your internet browser. Please note that if cookies are disabled, some or all of our services may become unavailable or not function as intended

## **5 TRANSFER AND DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

We use external service providers to assist with IT services and other administrative services, such as hosting, email delivery, data analysis and other services. Our service providers act as data processors on our behalf. We have entered into data processing agreements with our processors which contain obligations for the data processor to implement technical and organizational measures to ensure an appropriate level of security, confidentiality and integrity for the personal data, as well as to only process the relevant personal data in accordance with the data protection legislation and our instructions.

We will only transfer personal data to countries outside the EU/EEA in accordance with applicable data protection legislation, including by using a valid data transfer mechanism, such as Standard Contractual Clauses adopted by the EU Commission ("**SCCs**").

We will not disclose your personal data to any other third parties than the third parties described above, unless we are required to do so under applicable law, or if it is necessary to establish, exercise or defend legal claims.

## **6 RETENTION AND DELETION**

We retain all personal data for as long as necessary for the purposes for which they were collected and processed, unless statutes or regulations require us to retain them for a longer period. After that, they are deleted or anonymized.

For example, the personal data relating to users of the Stimline platform will be processed for as long as the relevant customer relationship is active and will be deleted, as a rule, within 1 year after its end.

## 7 SECURITY

As a data controller, we are responsible for the security and confidentiality of the personal data we process. We are furthermore responsible for implementing appropriate technical and organizational measures to ensure an appropriate level of security for the processing.

We are, for security reasons, not entitled to disclose detailed information on the security measures which we have implemented. However, we have implemented appropriate measures, policies and routines to ensure the security of our processing.

## 8 YOUR RIGHTS

You have the following rights when we process personal data about you:

- **Access.** You may contact us if you want to obtain confirmation with respect to whether we are processing your personal data, as well as access to and further information regarding our processing of your personal data. You may also request a copy of the personal data we are processing about you.
- **Correcting personal data (rectification).** You may ask us to rectify any errors in your personal data.
- **Erasure (the right to be forgotten).** You may ask us to erase your personal data, which we will respect and comply with unless, for example, we are required to retain your personal data or there are other circumstances that make continued storage necessary.
- **Restriction.** You may ask us to restrict the processing of your personal data, if the conditions for this under the data protection legislation are met. If the processing is restricted, your personal data will only be stored.
- **Object.** You are, on grounds relating to your particular situation (for example, a specific need for protection of your identity), entitled to object to processing of personal data based on legitimate interests, which we will comply with, unless there exists compelling legitimate grounds for our processing which override your interest, or if our processing is necessary for the establishment, exercise or defence of legal claims.
- **Data portability.** If we process personal data about you based on consent or to fulfil a contract, and the personal data is processed automatically, you can request us to provide the personal data to you or to a third party in a structured, commonly used, and machine-readable format.

Please note that the above rights may be subject to further exceptions and limitations in accordance with the data protection legislation.

You may contact us if you wish to exercise any of the above rights. Please note that we may request additional information from you if such information is necessary to confirm your identity.

## 9 QUESTIONS AND COMPLAINTS

If you have additional questions on how we process personal data, or are dissatisfied with our processing, you are welcome to contact us. Please find our contact information below.

You may also lodge a complaint with the relevant supervisory authority. Please click [here](#) to access the contact information to the Norwegian Data Protection Authority. The contact details for all EU Supervisory Authorities can be found [here](#).

Further details regarding your rights are available in the GDPR, which can be accessed by clicking [here](#).

## **10 CHANGES**

We may update the Privacy Notice from time to time. The Privacy Notice will, for example, be updated to comply with any legislative amendments or if we make changes to our processing of personal data.

The most recently updated version of the Privacy Notice will always be available at <https://www.stimeline.com/privacy-and-cookies>

## **11 CONTACT INFORMATION**

If you have any questions about this Privacy Notice, including how we process personal data, or would like to submit a request to exercise your rights, please contact us at:

[privacy@stimeline.com](mailto:privacy@stimeline.com)