

FAQ about GDPR in Wenaas Workwear AS

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This document seeks to answer frequently asked questions about Wenaas Workwear's Data Processing Agreement (Wenaas Workwear Terms of Use) and GDPR in Wenaas Workwear.

1.0 Wenaas terminology

1.1 What does the term "Wenaas Platform" cover?

The term "Wenaas Platform" refers to all existing and future parts of the Wenaas Workwear systems, including ERP, CMR in all versions and all add-on services provided to the basis systems.

Examples

- ERP – Aspect 4
- CMR - SuperOffice
- WMS – Wenaas Management system (Webshop)
- EDI – Partlink – shipment information
- Logiq – 3rd part invoicing solution
- Biztalk – 3rd part solution for EDI transactions of orders.

1.2 What is Wenaas Workwear Terms of Use?

Wenaas Workwear Terms of Use constitutes the agreement between the customer legal entity ("Customer") and the Wenaas Workwear local legal entity. The Terms of Use governs the Customer's access to and use of the Wenaas Workwear Platform.

Wenaas Workwear Terms of Use also governs the processing of personal data carried out by Wenaas Workwear connection with the delivery, and therefore constitutes the contract (Data Processing Agreement) between Wenaas Workwear AS and the Customer as required under the GDPR Article 28 No. 3.

1.3 What is Wenaas Workwear Data Processing Agreement?

Wenaas Workwear Terms of Use governs the processing of personal data.

Wenaas Workwear Data Processing Agreement (Wenaas Workwear Terms of Use) do not have to be signed by the customer.

1.4 What is Wenaas Workwear Privacy Policy?

Wenaas Workwear Privacy Policy explains what kind of information we collect when you communicate with us or visit one of our websites, how we collect it and why. It also explains the specific ways we use and disclose that information.

2.0 GDPR terminology

2.1 What is GDPR?

GDPR is an abbreviation of General Data Protection Regulation, which is a regulation that is issued by EU/EEA and enters into force 25th May 2018.

Wenaas Workwear publish all relevant documentation regarding GDPR online:

<https://www.wenaas.com/nb-no/data-security>

2.2 What is personal data?

Personal data is any information that relates to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data that has been de-identified, encrypted or pseudonymized but can be used to re-identify a person remains personal data and falls within the scope of the law.

Personal data that has been rendered anonymous in such a way that the individual is no longer identifiable is not considered personal data. For data to be truly anonymized, the anonymization must be irreversible.

The law protects personal data regardless of the technology used for processing that data – it is technology neutral and applies to both automated and manual processing, provided the data is organized in accordance with pre-defined criteria. It also doesn't matter how the data is stored – in an IT system, through video surveillance, or on paper; in all cases, personal data is subject to the protection requirements set out in the GDPR.

Examples of personal data:

- Name
- Home address
- Personal e-mail address (e.g. name@company.com)
- Phone no.
- Internet Protocol (IP) address
- Cookie ID

Examples of data NOT considered personal:

- Company registration no.
- General e-mail address (e.g. info@company.com)
- Anonymized data

2.3 What is sensitive personal data?

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for uniquely identifying a natural person, data concerning health or data concerning a natural person's

sex life or sexual orientation is considered sensitive and generally not allowed to process, except where certain conditions are met.

2.4 What is Data Subject?

A Data Subject is a living individual to whom personal data relates.

2.5 What is a Data Controller?

A Data controller is the one that determines the purposes and means of the processing of personal data.

Wenaas Workwear customers are data controllers of personal data collected and processed within the Wenaas Workwear Platform.

Wenaas Workwear is the data controller of personal data collected about Wenaas Workwear's customers, partners and employees.

2.6 What is a Data Processor?

Data processor is the one who processes personal data on behalf of the Data Controller.

Wenaas Workwear is the data processor of our customer's data processed within the Wenaas Platform.

2.7 What is Wenaas Workwear's purpose of processing personal data?

Personal data will only be collected and processed if there are a specified, explicit and legitimate purposes for it. Moreover, personal data will not be further processed in a manner that is incompatible with those purposes.

When Wenaas Workwear processes personal data the purpose is to fulfil the contract which the customer has signed with Wenaas Workwear. The terms for data processing in this regard is stated in Wenaas Workwear Terms of Use section.

Where Wenaas Workwear collect and processes data upon consent (e.g. newsletter signup) the purpose will be addressed in the specific situation. As well as clear information about withdrawal of the consent will be presented before the consent is given. The policy for data processing in this regard is stated in Wenaas Workwear's Privacy Policy.

2.8 What are the rights of the Data Subject?

Since the Data Subject is the owner of the data he/she has several rights which can be invoked to the Data Controller:

- **Right to access**

If asked, Wenaas Workwear will inform the data subject whether it has personal data about the data subject, and will give the data subject access to the personal data.

- **Right to rectification**
When notified by the data subject, Wenaas Workwear will correct all incorrect personal data and will complete any incomplete personal data.
- **Right to data portability**
The data subject has the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format, and has the right to transmit this data to another organization.
- **Right to object**
If a data subject objects to the processing of his or her personal data, Wenaas Workwear will cease processing the data, unless Wenaas Workwear can demonstrate that there are legitimate reasons to process the data
- **Right to be forgotten**
When there are no longer any legitimate reasons for Wenaas Workwear to keep personal data about a data subject, the data will be erased. This includes the situation where the data subject withdraws consent to keep the data.

These rights can only be invoked to the Data Controller so in cases where Wenaas Workwear is Data Processor the Data Subject must address the Data Controller (Wenaas Workwear's customer) who can manage all personal data directly in Wenaas Workwear Portal.

In cases where Wenaas Workwear is the Data Controller the Data Subject can send a request to Wenaas Workwear's DPO to invoke the rights. Moreover, Wenaas Workwear have controls in place to remove personal data when the purpose for processing is no longer present.

Please see section 2.4 for a clarification of the Data Controller and Data Processor terms.

2.9 How long does Wenaas Workwear process the personal data?

Wenaas Workwear will not process personal data any longer than necessary. The retention periods can differ based on the type of data processed, the purpose of processing or other factors.

A complete list of the types of personal data Wenaas Workwear processes and the retention period is available for download at <https://www.wenaas.com/nb-no/data-security>

2.10 Do Wenaas Workwear have an Information Security Management System?

Yes, Wenaas Workwear has implemented appropriate technical and organizational measures to ensure and to be able to demonstrate that processing is performed in accordance with the GDPR. These measures are reviewed and updated at regular intervals.

2.11 Are there any requirements for the collaborators which Wenaas Workwear transfer data to?

Yes, if Wenaas Workwear lets others process personal data, only providers who can do so in accordance with the GDPR will be used.

Wenaas Workwear ensures that a risk assessment, Data Processing Agreements and any necessary acceptance from customers are in place before letting others process personal data.

Moreover, Wenaas Workwear will have a contract with any providers that process personal data for it. The contract will describe the following:

- The subject matter of the processing
- The duration of the processing
- The nature and purpose of the processing
- The type of personal data and categories of data subjects
- Wenaas Workwear obligations and rights

Wenaas Workwear have Data Processing Agreements in place with all providers that process personal data.

2.12 Do Wenaas Workwear cooperate with the any supervisory authority?

Yes, when necessary Wenaas Workwear and its providers will cooperate with the personal data supervisory authorities. Since Wenaas Workwear's head quarter is placed in Måndalen the Norwegian supervisory authority, Datatilsynet (www.datatilsynet.no), is the natural point of contact.

2.13 What happens if a personal data breach occurs?

Wenaas Workwear has procedures for data breach handling. In the case of a personal data breach, Wenaas Workwear will, as soon as possible and within 72 hours after having become aware of it, notify the breach to the supervisory authority, unless the breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it will be accompanied by reasons for the delay.

The notification will:

- describe the nature of the personal data breach
- communicate the name and contact details of the data protection officer
- describe the likely consequences of the personal data breach
- describe the measures taken or proposed to be taken by Wenaas Workwear

Wenaas Workwear have implemented a Business Contingency Plan. Wenaas Workwear does also have routines in place to handle information towards supervisory authority.

2.14 Do you notify the data subject if you have a personal data breach?

Yes, if the personal data breach is likely to result in a high risk to natural persons, Wenaas Workwear will communicate the personal data breach to the data subjects without undue delay.

Wenaas Workwear have routines in place to handle information towards data subjects.

2.15 Do Wenaas Workwear have a designated DPO?

Yes, Wenaas Workwear has appointed a designated DPO (Data Protection Officer). All relevant contact information will be published on Wenaas Workwear website and communicated to the supervisory authority.

2.16 What if Wenaas Workwear transfer data outside the EU/EEA?

If and when Wenaas Workwear transfers data outside of the EU/EEA, all provisions given in the GDPR will still be adhered to.

2.17 Are transfers subject to appropriate safeguards?

Yes, in the case where the commission has not made any adequacy-based decision that a third-party country is safe, Wenaas Workwear will only transfer personal data outside of the EU/EEA if Wenaas Workwear has provided appropriate safeguards, and if enforceable personal data rights and effective legal remedies are available.