

Privacy Statement Soiltech ASA

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1 Purpose

The purpose of this statement is to ensure that Soiltech AS processes personal data lawfully, fairly, and transparently. Personal information is only collected for specified, explicit, and legitimate purposes and is not used in ways incompatible with those purposes.

Soiltech ASA is committed to protecting your personal data and ensuring that all processing of personal information is carried out in accordance with the General Data Protection Regulation (GDPR), the Norwegian Personal Data Act, and other relevant legislation.

This privacy statement explains how we collect, process, and store personal information about people outside our own workforce: contact persons at customers, suppliers and partners, visitors to our website, job applicants, former employees, hired-in personnel, board members and shareholders. Current employees receive separate information in ADM-PRO-00004 Privacy Statement Employees.

2 Scope

This privacy statement applies to all Soiltech ASA locations and to all personal data about the groups listed in section 1.

Definitions	
GDPR	The EU's General Data Protection Regulation (EU) 2016/679.
Personal data	Any information that can directly or indirectly identify an individual person.
Sensitive data	Includes health data, trade union membership, political opinions, genetic and biometric data, etc
Data controller	The party that determines the purpose and means of processing personal data (Soiltech ASA).
Data processor	Any third party that processes personal data on behalf of the controller (e.g., IT and hosting providers).

3 Responsibility and authority

The CEO of Soiltech ASA has overall responsibility for the company's processing of personal data. Daily follow-up may be delegated, but responsibility remains with the company.

The VP People & Organization is responsible for developing, implementing, and maintaining this procedure.

4 Personal Data

4.1 Data controller

Soiltech ASA
Koppholen 25
4313 Sandnes, Norway
Phone: +47 480 20 555
Email: post@soiltech.no

4.2 Personal Data We Process

We may store and process the following categories of personal data:

- Name, job title, company, business phone number and business e-mail address (contact persons at customers, suppliers and partners).
- Job applications, CVs, references, interview notes and related correspondence (job applicants).

- Employment contract, period of employment, position, salary and tax records and personnel matters (former employees).
- Name, contact details, employer, position, CV, qualifications and rotation details (hired-in personnel).
- Name, contact details, date of birth or national identity number, bank account and remuneration (board members), and shareholding and dividend information (shareholders).
- IP addresses and technical data related to visits to our website, and name and e-mail address of newsletter subscribers.

4.3 Purpose of Processing

We process personal data for the following purposes:

- To fulfil contractual obligations with customers, suppliers, and partners.
- To communicate offers, orders, deliveries, and other business information.
- To process job applications and maintain contact with candidates.
- To ensure stable and secure operation of our website and digital services.
- To meet our legal obligations as an employer and as a public limited company, including towards former employees, board members and shareholders.
- To plan and staff operations and ensure that hired-in personnel are qualified.

4.4 Legal Basis for Processing

The legal bases for processing personal data are:

- **GDPR Article 6(1)(b):** Processing is necessary to fulfil a contract or pre-contractual obligations.
- **GDPR Article 6(1)(c):** Processing is necessary for compliance with legal obligations (e.g., accounting regulations).
- **GDPR Article 6(1)(a):** Consent from the data subject, for example for newsletters or marketing communications.
- **GDPR Article 6(1)(f):** Legitimate interest, such as website security or improving digital services.

Which legal basis applies to each group of people is described in section 5. Health information about former employees, such as sick leave records, is processed because it is necessary for our obligations under employment and social security law (GDPR Article 9(2)(b)). You may withdraw your consent at any time by contacting us.

5 Collection of personal data

5.1 From our web site

Soiltech ASA has day-to-day responsibility for processing personal data collected through our website.

The website is built on the WordPress platform, which uses certain technical cookies and may process IP addresses to ensure secure and stable operation.

When you visit our website, your IP address and certain technical data (such as browser type, device, and pages visited) may be temporarily stored in server logs. These data are used only for security and performance purposes and are not used to identify individuals.

Our website uses necessary cookies for functionality (e.g., login, security, language settings). If additional cookies (for analytics, statistics, or marketing) are used, they are handled in accordance with the Electronic Communications Act (Ekomloven) section 3-15, which requires consent that meets the GDPR requirements. Visitors will always be informed and asked for consent before non-essential cookies are stored.

We may use third-party tools such as Google reCAPTCHA, Google Fonts, or analytics services to maintain security and performance. These providers may process IP addresses and technical data. Some of these providers, such as Google, may transfer data to the United States. Such transfers are based on the EU-U.S. Data Privacy Framework.

When you subscribe to newsletters or submit a form on our website, you consent to the storage of your personal data (such as name and email address) for that purpose (GDPR Article 6(1)(a)). Only authorized administrators have access to this information. Newsletter subscribers are stored until they unsubscribe.

5.2 Customer and supplier information

Customer and supplier information is managed through our business systems (CRM and ERP), which store contact details and communication history. Access is restricted to authorized employees.

Our contract is with your employer, not with you personally. Processing of your contact details is therefore based on our legitimate interest in running our business and following up offers, orders and deliveries (GDPR Article 6(1)(f)). The data is limited to business contact details and the processing is foreseeable for you. Accounting records are kept because the law requires it (Article 6(1)(c)).

We only send marketing e-mails when you have consented, or when your employer is an existing customer and the e-mail concerns similar services, as required by the Marketing Control Act section 15. You can unsubscribe at any time.

5.3 Job applications

When you submit a job application, we process your personal data to assess whether you are suitable for the position and to document that the recruitment was fair. This is our legitimate interest (GDPR Article 6(1)(f)). This includes your application, CV, references, correspondence, and our internal assessments. Data from recruitment processes is deleted no later than six months after you have been informed of the outcome. If we want to keep your application for future positions, we will ask for your consent first. If you are hired, the data moves to your personnel file.

5.4 Disclosure of Information to Third Parties

We do not sell personal data. We share it only when required by law or necessary for the purposes described in this statement.

Our data processors handle data on our behalf under a written data processing agreement in accordance with GDPR Article 28. They include our IT supplier (KLERI AS) and Microsoft 365, our business management and CRM system (Business Online), our accounting firm (Hav Regnskap), our HR and payroll system (Mintra AS), our board portal (Admincontrol), and our website hosting provider (Zebra Media Stavanger AS) and our recruitment solution (Finn.no).

Other recipients receive data when the law requires it, such as the Tax Administration, NAV, the Register of Business Enterprises and the central securities depository (VPS).

Outside the EU/EEA: Soiltech has a branch in the United Kingdom. The EU has decided that the UK provides an adequate level of data protection (valid until 27 December 2031). Website tools from Google may transfer data to the United States under the EU-U.S. Data Privacy Framework, see section 5.1.

5.5 Former employees

After your employment has ended, we keep some personal data to meet our legal duties as an employer, document that we have fulfilled our obligations, handle possible disputes, and confirm your employment history. The basis is legal obligation under the Bookkeeping Act, the Tax

Administration Act, the A-opplysningsloven and the National Insurance Act (GDPR Article 6(1)(c)), and our legitimate interest in documenting personnel matters (Article 6(1)(f)). Health information, such as sick leave records, is processed under Article 9(2)(b).

5.6 Hired-in personnel

We process name, contact details, employer, position, CV, qualifications and rotation details to plan and staff operations and ensure that personnel are qualified. The data comes from you or from the agency that employs you. The basis is legal obligation under health and safety legislation (Article 6(1)(c)) and our legitimate interest in planning and documenting operations (Article 6(1)(f)).

5.7 Board members and shareholders

For board members, we process the data needed to administer board work, pay remuneration and report to public authorities. The basis is legal obligation under the Public Limited Liability Companies Act and tax and reporting legislation (Article 6(1)(c)), and the agreement on board remuneration (Article 6(1)(b)). The shareholder register is kept in the central securities depository (VPS) as required by the Public Limited Liability Companies Act (Article 6(1)(c)). Parts of the register are public by law.

5.8 Visitors to our premises

Visitors to our premises are registered with name, company, host and time of visit, for security and so that we know who is in the building in case of an emergency. This is our legitimate interest (Article 6(1)(f)).

5.9 Retention and Deletion of Personal Data

Personal data are retained only for as long as necessary for the purpose they were collected.

- Contact persons at customers, suppliers and partners: deleted when we learn that you have left the company, when a new contact person is appointed, or when the relationship ends, unless needed to document rights or obligations under a contract. Accounting records are kept for five years after the end of the financial year.
- Job applicants: deleted no later than six months after you have been informed of the outcome.
- Former employees: personnel matters are kept for five years after the employment ended. Accounting records are kept for five years after the end of the financial year. Confirmation of employment (name, position and period) is kept permanently.
- Hired-in personnel: two years after the last assignment, unless needed to document an incident or a contract.
- Board members: payment and tax records five years after the end of the financial year. Board minutes are kept for the lifetime of the company.
- Shareholders: as long as you hold shares. Former shareholders: ten years. Minutes from general meetings are kept for the lifetime of the company.
- Newsletter subscribers: until you unsubscribe.
- Website data (logs and cookies): deleted automatically after a short technical retention period, usually 14–90 days.

5.10 Rights of the Data Subject

You have the right to:

- access the personal data we hold about you
- have incorrect data corrected
- have data deleted when we no longer need it or have no legal basis for it
- ask us to restrict the use of your data while a question is being clarified
- object to processing based on our legitimate interest, and always object to direct marketing
- receive data you have given us in a common format (data portability)

- withdraw your consent at any time, where processing is based on consent

Requests should be sent to post@soiltech.no. We will respond within one month. We do not use automated decision-making or profiling. If you believe your rights have been violated, you can contact the Authority (Datatilsynet): www.datatilsynet.no.

5.11 Data Protection Officer

Based on our assessment, Soiltech ASA is not required to appoint a Data Protection Officer, as we do not engage in large-scale processing or monitoring of individuals. This assessment is documented internally and available upon request.

5.12 Information Security

Access is restricted, multi-factor authentication is required, data is encrypted where necessary, and employees receive training in information security.

5.13 Contact

If you have questions about this privacy statement or how we process personal data, please contact us:

Soiltech ASA

Koppholen 25, 4313 Sandnes, Norway

Phone: +47 480 20 555

Email: post@soiltech.no

If you wish to file a complaint, you may contact the Norwegian Data Protection Authority:

www.datatilsynet.no

6 References

- Electronic Communications Act (Ekomloven) § 3-15 – Cookies
- Datatilsynet – Information about cookies
- ADM-PRO-00004 Privacy Statement Employees
- ADM-POL-00003 Privacy (GDPR) Policy
- Soiltech's Employee Handbook
- Soiltech's Context Register
- Soiltech's Cyber & Information Register
- Soiltech's Law & Compliance Register
- Soiltech's Emergency Procedure, Action Card 8: Cyber Crime