

Adams Express Data (Privacy) Protection Procedure

Adams Express AS, registered at Håndverksveien 11, NO-1405 Langhus, Norway, collects personal data about you and your dependents and family members (as applicable) in connection with the provision of the removal services requested by you. This personal information however is strictly limited and considered as absolutely necessary to execute the removal service delivery to you.

Privacy and data protection laws protect the integrity and confidentiality of a person's private information. We understand the nature of the confidential information you are providing to us and we maintain physical and electronic security systems in place and procedures and policies to ensure your personal data is safe and secure with Adams Express AS. We have a strict code of conduct in place and all our staff are governed by this and required to maintain customer privacy and confidentiality.

Our Data (Privacy) Protection procedure addresses 10 privacy principles:

These 10 privacy principles are essential to the proper protection and management of personal and sensitive information. They are based on internationally known fair information practices included in many privacy laws and regulations of various jurisdictions around the world and recognized good privacy practices.

Outlined Summary:

1. Management:

We will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.
- Meet our legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements.

We ensure that we have necessary measures in place ensuring compliance with up to date Data (Privacy) Protection regulations.

We ensure that everyone processing personal information understands that they are contractually responsible for following good data protection practice aligned with internal procedures and legal requirements.

We collect, process and transfer personal information through computerized and paper-based data processing systems.

We have established routine processing functions to ensure data protection.

We ensure that all processing and transfers of personal information are subject to reasonable confidentiality and privacy safeguards.

2. Notice:

We provide notice about our privacy policies and procedures at the time of processing personal data within Adams's database. We are committed to respect individuals' data by handling all their personal information collected in connection with the provision of the removal service in accordance with applicable law as well as our own Privacy Policies.

We only process personal information related to the provision of the removal service requested by you.

We may process sensitive information if it is needed to comply with applicable law.

In general, personal and/or sensitive information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place.

3. Choice and consent:

When requesting the provision of the removal service from Adams Express AS, we will ask you to sign a privacy undertaking consent form, where you are asked to give your explicit consent with respect to the collection, use, and disclosure of personal information as described in this notice. Explicit consent here means you were clearly presented with an option to agree or disagree with the collection, use, or disclosure of personal information.

4. Collection:

We shall obtain and process personal data fairly and in accordance with our legal obligations. We only collect personal information in connection with the provision of the removal services requested by you.

5. Use, retention, and disposal:

We limit the use of personal information to the sole purpose of providing the requested removal services to you, for which we have obtained consent at the time of entry into our database.

We retain personal information for only as long as necessary to fulfil the stated purposes or as required by law or regulations and thereafter appropriately dispose of such information.

6. Access:

You may reasonably access and update your personal information by contacting Adams Express AS.

This notice provides basic information about our processing of your personal information and your privacy rights. Should you have additional questions, you may contact IT & Logistics Manager, Hans Peter Veiteberg, hpv@adamsexpress.no.

7. Disclosure to third parties:

We shall use and disclose your personal data only in circumstances that are necessary for the purposes for which we collected the data. We will never sell nor distribute your personal

information to third parties, who are not a part of the provision of the removal services requested by you.

8. Security for privacy:

We protect personal data against unauthorized access (both physical and logical) aligned with our internal IT policy and procedures. We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction. Personal data will only be accessible to authorised staff.

9. Quality:

We maintain accurate, complete, and relevant personal information as reasonably possible and only for the purposes identified in this notice.

Please note that we have shared responsibility with regard to the accuracy of your personal information. Please let us know of any changes to your personal information.

10. Monitoring and enforcement:

We monitor compliance with our privacy policies and procedures and have procedures to address privacy related complaints and disputes. All Adams Express AS staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them. If you believe that your personal information is not handled in accordance with the applicable law, GDPR Regulations or our privacy policies, you may submit a complaint to our Managing Director who will investigate the complaint.

In case of breach of GDPR Regulations, we will investigate this breach within the applicable timeframe.

This Data Protection Policy will be reviewed regularly in light of any legislative or other relevant developments.

Last updated: 31-05-2018