



Privacy Policy
for
CoOper8 Services



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1 Introduction

CoOper8 (“we”) is a company providing digital information sharing services to the companies and suppliers in the Energy industry, within the areas of equipment documentation, virtual and digital warehouses, as well as digital exchange of planning data between stakeholders and systems. For more information about the various Services we provide, please visit www.cooper8.no.

This Privacy Policy provides privacy terms and conditions common to all Services we provide within the CoOper8 service portfolio and is further supplemented by individual service privacy policies for each Service, all available at www.cooper8.no/privacy-terms.

Words in this document with capitalized initial have their definition stated in the definition and abbreviations section the General terms document available at www.cooper8.no/terms-of-services.

This Privacy Policy explain how we may collect, process, share, transfer and retain your personal data when you are acting as:

- 1) A User of one or more of our Services
and/or
- 2) A company representative towards us, fulfilling certain duties and responsibilities in relation to Services in use by your company (User organisation).

2 Why do we collect personal data?

When you use our Services, we process personal data about you to be able to provide the Services to the User organisations and to manage and follow-up the Agreement. When you are acting as a company representative, we process your personal data to communicate with you and the company you are representing. Our legal basis for such processing is our legitimate interest in communicating with you. In addition, we may process personal data for security purposes. Our legal basis for such processing is our legitimate interest in ensuring the security of our Services.

3 Which personal data do we collect?

We do not collect any sensitive personal data and will only collect limited personal data required to be able to fulfil our role as a provider of Services. Our collection and use of personal data are in accordance with applicable data protection legislation (including the GDPR) and embedded into our internal processes and procedures.

Our processing of personal data on behalf of the User organisation only covers categories of personal data which are implied under the Agreement for the purpose of entering into the Agreement, management and/or follow-up of the Agreement and providing the Services, and only to the extent and as long as necessary to fulfil such purposes.

We will use system event information for enabling secure and efficient delivery and operation of the Services and/or to identify and correct security Incidents. Such information is not stored longer than necessary to reach the goal of secure operation and is not shared with the User organisation or Third parties (sharing with subcontractors on a need-to-know basis will be allowed). The User organisation acknowledges that we are not obliged to disclose information to the User organisation in respect of individual Users’ use of the Services.

When you are a User of a Service

Our focus is to only collect data required to provide you secure access to the service, as well as fulfilling our obligations to your company according to the user agreement framework between CoOper8 and your company.

The terms of such agreement are available on www.cooper8.no/terms-of-services. The limited personal information that we process in each Service is described in the individual Service's privacy policy available at www.cooper8.no/privacy-terms.

When you use our Services, CoOper8 acts as data processor, and your User organisation having instructed you to use the given Service, acts as data controller.

When you are a company representative

Our governance and provisioning of Services require us to maintain various contact points towards our User Organisations, subcontractors and other external organisations.

When you have been instructed by your company to fulfil certain duties and responsibilities towards CoOper8, we may collect limited personal information about you that typically include name, email, the organisation you represent, title/role and phone number. The personal information is typically stored in our CRM system and other supportive systems used for efficient management of our external stakeholders. In this context, CoOper8 acts as a data controller as we define the purpose of the processing of the personal data.

4 Do we use cookies and automatic data collection tools?

Our Services may store and retrieve information, such as cookies, on your devices. In most cases, this storage and retrieval is technically necessary to deliver the Service and requires no further actions from you.

If a Service uses cookies that are not strictly necessary (e.g., for analytics, personalization, or marketing), we will inform you in that Service's specific Privacy Policy. In such cases, we will request your explicit consent before activating those cookies.

For more information about cookies and the applicable legal framework, please refer to the [European Commission's guidance on cookies](#).

5 How do we process your personal data?

When you are a User of a Service

Details on how your personal data are being processed are specified in the individual Service's privacy policy available at www.cooper8.no/privacy-terms.

When you are a company representative

When you are acting as a company representative, we may process your personal data to:

- Send your relevant information concerning aspects of where you are appointed as contact point in your organisation.
- Grant you access to any supportive systems we use for dialogue with external staff, including but not limited to document sharing systems and contract portal.
- Process orders, invoicing, payments and other financial follow up.

6 Do we share your personal data?

We do not sell or market any personal information we collect about you to any Third party. We may only share your personal data as follows:

With our subcontractors

We may share your personal data with our subcontractors directly involved in the delivery of a Service, e.g. subcontractors delivering user authentication services and providing service desk functions. We will in all such matters have a data processor agreement towards the subcontractor, preventing use of your personal data for other purposes than defined by the Privacy terms.

Within a Service

Each individual Service may be designed to share limited information about you with other Users of the Service, as the Services are typically used to collaborate across organisational boundaries. For details, reference is made to each Service Privacy Policy available at www.cooper8.no/privacy-terms.

7 Transfer of personal data to third countries

As a principle, we host all our Services and supportive solutions within the European Economic Area (EEA).

If the processing requires transfer of data for processing outside of the EEA or involvement of subcontractors outside of the EEA, we will inform your User organisation and only initiate such transfer based on your User organisation's consent. In such case, we will make sure that a valid legal basis for such a transfer, such as the EU Standard Contractual Clauses, is established before any transfer activities are initiated.

8 Do we retain your personal data?

When you are a User of a Service

Details regarding retention of personal data is specified in each individual Service's Privacy Policy available at www.cooper8.no/privacy-terms.

When you are a company representative

When you no longer represent your company towards us, we primarily delete your accounts from our CRM and other support solutions.

The information systems might still have traces of your historic activities from when acting as a representative for your organization as we need to store limited information to document the User organisations involvement and representation in our governance activities.

Examples could be document metadata ("created by"), approval history on documents and other information we need to have documented historically. to document our user organisation involvement in the governance of the services we provide to our user organisations.

9 What are your rights?

When you are a User of a Service

For personal data processing within a Service, we act as a data processor, only processing data according to the data processor agreement we have in place with your company, acting as the data controller. You should contact your company if you have questions about privacy within a given Service not being answered by this privacy policy and Service Privacy Policies available at www.cooper8.no/privacy-terms. Similarly, you should contact your company if you want to exercise any of your other rights regarding protection of personal data.

When you are a company representative

1. Right to opt-out of communications from us

You have the right to opt-out of receiving newsletter communications from us and can do so by either following the instructions for opt-out in any newsletter communication or contacting us via e-mail on hello@cooper8.no.

Please note that even if you opt-out from receiving communications, you may still receive administrative communications from us, such as order confirmations and notifications about your account activities (e.g. account confirmations and personal profile changes).

2. Access and rectification

You have the right to request a copy of what personal data we have stored about you.

You may send us a request for this to hello@cooper8.no. You also have the right to request that we correct any inaccuracies in your personal data, unless we have enabled you to do such updates yourself via appropriate "My account" functionality within the supportive solutions we use in the collaboration with representatives from our external stakeholders.

3. Right to be “forgotten”, object to processing, data portability

Unlike providers of consumer services, we only store information about you as a representative of your company.

Therefore, the rights to be “forgotten”, object to processing and data portability are considered not relevant for our processing of personal data regarding you.

4. File a complaint with a data protection authority

If you believe that our processing of personal data relating to you infringes applicable laws, you may file a complaint with relevant data protection authority.

10 How do we protect your personal data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your personal data against loss, misuse, unauthorised access, disclosure, and alteration. While we are dedicated to securing our Services and supportive solutions, you are responsible for securing and maintaining the privacy of your password(s) and account/profile registration information and verifying that the personal data we maintain about you is accurate and current.

11 Changes to this Privacy Policy

We may revise this policy and the service-specific privacy policies on www.cooper8.no/privacy-terms from time to time to reflect changes to our business, the Services, or applicable laws.

The policies on www.cooper8.no/privacy-terms will be effective as of the date stated at the top of each policy.

If the revised version includes a substantial change, we provide a prior notice as described in the contract between CoOper8 and the User organisation as available on www.cooper8.no/privacy-terms.

12 Contact us

We value your opinion. If you have any comments or questions about our privacy framework, any unresolved privacy or data use concerns that we have not addressed satisfactorily, or concerning a possible breach of your privacy, please send them to hello@cooper8.no.

We will handle your requests or complaints confidentially. Our representative will contact you to address your concerns and outline the options regarding how these may be resolved. We aim to ensure that complaints are resolved in a timely and appropriate manner.