



**CoOper8**  
**Virtual Inventory**  
**Privacy Policy**



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## 1 Introduction

This document describes how CoOper8 ("we") handles your personal data within the CoOper8 Virtual Inventory service (hereafter called "Service") based on you being a User of the Service.

Privacy principles that are common to all CoOper8 services, which therefore also apply to this Service, are described in the *Privacy Policy* available at [www.cooper8.no/privacy-terms](http://www.cooper8.no/privacy-terms).

Words in this document with a capitalized initial have their definition stated in the definition and abbreviations section in either the General terms or the Virtual Inventory Special terms, both available on [www.cooper8.no/terms-of-services](http://www.cooper8.no/terms-of-services).

## 2 Which personal data do we collect?

### **Account information**

As a User of the Service, you will have a user account containing following information about you:

- Name
- Organisation (employer)
- Email
- Phone number

### **Data collected when you use the Service**

As integrity of the information stored within the Service is of importance, the Service will store certain user activity information, such as by whom and when objects were created, updated, moved, deleted, downloaded, and distributed.

### **Technical information about your device and internet connection**

We use server logs and other tools to record technical information about your device, connection to our services and cross-device usage. This information typically includes operating systems, web browser versions, IP addresses and session-based authentication cookies, and unique identifiers.

### **Cookies and other technologies that store data locally on your device**

When you use CoOper8 services, we use different technologies to recognize you as a User and provide a seamless access to the services.

### **Group and role membership information**

Administrative users in your organization will manage your access to the Service. Such assignments and changes to your roles and access groups are stored. This is due to requirements that the Service shall support transparency about who can access what.

## Data you provide us directly

When you communicate with us, contact our customer support teams, or respond to a survey, you will provide information to us.

## 3 How do we process your personal data?

The personal data collected as described in previous section is processed as follows:

**To provide you support and guidance**, including to:

- Provide you with efficient Service support via service desks
- Help diagnose problems reported by you to the service desk
- Inform you about possible compatibility issues with the browser you use
- Improve your web experience
- Send you important information, e.g. in case of service unavailability

**Manage security in the Service** by:

- Verifying your identity as part of the log-in process
- Monitor your log-in activities and account modifications to help you detect and prevent fraud and abuse of the Service.

**Service improvement** by:

- Aggregation to analyse and improve the performance of the Service, but where data is then anonymized.

**For our and User organisation's legitimate interests**, including to:

- Be in compliance with requirements between CoOper8 and your organisation as available on [www.cooper8.no/terms-of-services](http://www.cooper8.no/terms-of-services).

## 4 Do we share your personal data?

Except as described in the Agreement or above, personal data will not be transferred or provided to any Third parties.

## 5 Transfer of personal data to third countries

Except as described in the Agreement or above, personal data will not be transferred or accessed from outside the European Economic Area (EEA).

## 6 Do we retain your personal data?

When you no longer have a need or legal right to have a user account, the user account is deleted by an administrative user in your company.

No personal data is retained except that for integrity purposes, all data transactions in the Service must be traceable and will therefore include a link to actual user that uploaded the material data. This information will not be deleted but stored throughout the lifetime of the Service.

## 7 Subcontractors

Below the list of Vendors and subcontractors which conduct processing of personal data on behalf of CoOper8 as part of delivery of the Service.

Name	Tasks/deliverables	Within EEA (Y/N)	Basis for transfer (N/A, SCC, AD) <sup>1</sup>
CEGAL AS*	<ul style="list-style-type: none"> <li>Platform as a Service (PaaS) provider</li> <li>Monitoring</li> </ul>	Y	N/A
Microsoft Ireland Operations Limited*	<ul style="list-style-type: none"> <li>Azure Platform services</li> </ul>	Y	N/A
Tietoevry Norway AS	<ul style="list-style-type: none"> <li>Application Management</li> <li>Application Development</li> </ul>	Y	N/A
Tietoevry Create Bulgaria EOOD**	<ul style="list-style-type: none"> <li>Application Development</li> <li>2nd and 3rd line support</li> </ul>	Y	N/A
Tietoevry Create Poland Sp. z o.o.Æ 0001020114 **	<ul style="list-style-type: none"> <li>Application Development</li> <li>2nd and 3rd line support</li> </ul>	Y	N/A
Tietoevry Create Ukraine LLC30522902 **	<ul style="list-style-type: none"> <li>Application Development</li> <li>2nd and 3rd line support</li> </ul>	N	SCC
Vivicta AS***	<ul style="list-style-type: none"> <li>1<sup>st</sup> line user support</li> <li>User organisation administration and support</li> </ul>	Y	N/A

\* Formally subcontractor of Bransjeforeningen Offshore Norge<sup>2</sup>

\*\* Subcontractor of Tietoevry Norway AS

\*\*\* Formally subcontractor of Offshore Qualific AS<sup>3</sup>

<sup>1</sup> N/A = Not applicable, SCC = Standard Contractual Clauses, AD = Adequacy Decision

<sup>2</sup> Bransjeforeningen Offshore Norge was the initial provider of the Service, and during a transition period formally acts as a Vendor to CoOper8 pursuant to a cooperation agreement with CoOper8

<sup>3</sup> Offshore Qualific AS and CoOper8 has a shared support team delivery where Offshore Qualific AS is the contract party towards Vivicta AS, while there is a cooperation agreement between Offshore Qualific AS and CoOper8 regulating the shared service.