



External privacy notice

In this privacy notice (the privacy notice or notice) we will describe our processing of personal data, such as what categories of personal data we process, the purposes of our processing, how we use the personal data, and how you may exercise your rights in accordance with applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (GDPR). Our processing of personal data shall always be in line with the GDPR and with country-specific data protection regulations applicable to Glamox.

This privacy notice applies to Glamox AS, Birger Hatlebakks vei 15, 6415 Molde, Norway, VAT no. 912 007 782 and to all legal entities in the Glamox Group. You may find a list of Glamox companies here. Note that local versions of the privacy notice can apply under country-specific regulations.

1. Glamox is the controller

The “controller” is a person or organization who alone or jointly determines the purpose and means of the processing of personal data.

The controller with respect to the processing of your data under this notice, is the Glamox company with which you had, have or will have a business relationship or that otherwise decides the purpose and means of the processing of your data, as well as Glamox AS.

2. How can you exercise your rights?

If you have any comments on this privacy notice or want to review, update, remove or correct your personal information or you want to contact us, please send an e-mail to: privacy@glamox.com. In section 10 of this notice you will find an overview of your rights as a data subject

If you have unresolved concerns or if you consider that our processing of your personal data infringes your rights, you also have the right to complain to the supervisory authority competent to resolve such concerns according to the applicable law. However, Glamox encourages you to contact us first in order to clear any misunderstandings.

3. How do we collect personal data?

We collect your data when you visit our websites, applications or social media channels, purchase and use our products, services, web-based tools, mobile applications, systems, subscribe to our newsletters, webinars, provide your goods or services, apply for a position, contact our customer support, join our business events, participate to our contests, promotions and surveys or otherwise interact with us.

4. What are our sources of personal data?

Glamox collects personal data directly from you or from third-parties such as public databases, joint marketing partners, social media platforms and other third parties. In addition, some personal data are collected by Glamox automatically when you visit a Glamox website or application, subscribe to our newsletters or otherwise interact with us through our digital channels.

5. What categories of personal data are collected?

Below you will find an overview of the categories of data that we may collect:

Categories of personal data	Examples
Personal identification data	Name, title
Contact information data	E-mail, phone number, employer, address, country
Account login information	Login ID, password or other security codes
Images or videos, or quotes from which you may be identified	Pictures uploaded to accounts or otherwise provided to us for example in the context of a webinar or an interview
Financial data	Credit card data, bank account data
CCTV and physical security data	CCTV footage and other information relating to access of our facilities obtained through electronic means, such as swipe card records, or visitor logbook.
Any other information you decide to voluntarily share with any Glamox entity	Feedback, opinions, reviews, comments,
Recruitment data	Any personal data contained in your CV, application form, record of interview or interview notes, records of assessments and vetting and verification documentation
Profile Data	Profile settings, marketing and communication preferences such as your preferred language of communication and content, alert and display preferences, content type and frequency of email alerts, date of registration and current stage of registration, account status and level of access.
Usage Data	Information about your use of our website, our electronic portals and platforms, as well as our local area networking facilities (including WiFi) and similar electronic services, such as interactions with our mobile applications, information collected progressively when you visit our website, electronic portals and platforms, including your referral website, pages you visit, actions you take.
Technical Data	Internet protocol (IP) address or domain names of the devices utilized, your login data, browser type and version, uniform resource identifier (URI) address, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you are using.
Marketing data	Information regarding when you receive and read marketing communications from us, which of our events you attend and marketing and communication preferences
Cookies data	Please see our Cookie notice on www.glamox.com in the bottom left corner

6. Purposes and legal basis for our use of your personal data

Below you will find an overview of the categories of data that we may collect:

Purpose and/or activity	Categories of data (see section 5)	Legal bases for processing
To onboarding you or your employer as a new customer including performing KYC checks, sanction screening, anticorruption and other background checks	<ul style="list-style-type: none"> Personal identification data Contact information data Financial data 	<ul style="list-style-type: none"> Performance of a contract Legal or regulatory obligation Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities

To deliver goods and services	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Financial data • Profile Data • Usage Data • Technical Data • Marketing Data 	<ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation • Legitimate interests: ensuring that you are provided with the best customer services we can offer, and securing a prompt payment of any fees, costs and debts in respect of our services
To manage payments, fees and charges and to collect and recover money owed to us	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Financial data 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us
To manage our relationship with you or your employer	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Profile Data • Marketing Data 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests: ensuring we can notify you about changes to our terms of business
To interact with governmental or regulatory bodies or other authorities in relation to you or your employer, subject to applicable laws	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Financial data 	<ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation
To manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Profile Data • Usage Data • Technical Data • Marketing Data 	<ul style="list-style-type: none"> • Consent • Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security, fraud prevention and improving or reorganizing our infrastructure or the Glamox Group
To invite you to take part in marketing or other promotional events, or similar events, and to manage your participation in them	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Profile Data • Marketing Data 	<ul style="list-style-type: none"> • Consent
To ask you for feedback (for instance, in a survey) about our products and services, and to manage, review and act on the feedback we are getting	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Profile Data • Marketing Data 	<ul style="list-style-type: none"> • Legitimate interests: reviewing how clients use, and what they think of, our products and services, improving them and identifying ways to grow our business

In relation to our suppliers, vendors and other business partners

Purpose and/or activity	Categories of data (see section 5)	Legal bases for processing
To onboarding you or your employer as a new supplier including performing KYC checks, sanction screening, anticorruption and other background checks	<ul style="list-style-type: none"> • Personal identification data • Contact information data • Financial data 	<ul style="list-style-type: none"> • Performance of a contract • Legal or regulatory obligation • Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities

To manage payments, fees and charges and to collect and recover money owed to us	<ul style="list-style-type: none"> Personal identification data Contact information data Financial data 	<ul style="list-style-type: none"> Performance of a contract Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us
To manage our relationship with you or your employer	<ul style="list-style-type: none"> Personal identification data Contact information data Profile Data 	<ul style="list-style-type: none"> Performance of a contract Legitimate interests: ensuring we can notify you about changes to our terms of business
To interact with governmental or regulatory bodies or other authorities in relation to you or your employer, subject to applicable laws	<ul style="list-style-type: none"> Personal identification data Contact information data Financial data 	<ul style="list-style-type: none"> Performance of a contract Legal or regulatory obligation
To manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities	<ul style="list-style-type: none"> Personal identification data Contact information data Profile Data Usage Data Technical Data 	<ul style="list-style-type: none"> Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security, fraud prevention and improving or reorganizing our infrastructure or the Glamox Group

In relation to user of our website

Purpose and/or activity	Categories of data (see section 5)	Legal bases for processing
Recruitment and selection	<ul style="list-style-type: none"> Any personal data contained in your CV, application form Record of interview or interview notes, Records of assessments 	<ul style="list-style-type: none"> Legal or regulatory obligation Consent
Recruitment verification	<ul style="list-style-type: none"> Vetting and verification documentation 	<ul style="list-style-type: none"> Legitimate interests

In relation to Glamox on social media platforms

Glamox has company accounts on LinkedIn, Facebook, Instagram, YouTube, Vimeo and Twitter and uses these accounts to promote our company and products to current and prospective customers, employees and the public. When interacting with us on these accounts, or if you share any content from one of these accounts we will be able to see your basic user information. If we respond to you within the same platform we will process your personal data related to our interaction with you, but the processing of personal data on such platforms is managed by the terms of use and privacy policies applicable to each platform. You can always unfollow our social media accounts and delete comments and messages. We also encourage you to never post confidential or sensitive personal information on these accounts. Processing of personal data related to social media platforms is either based on consent or our legitimate interest.

In relation to Glamox whistleblowing channel

If you report a concern through our whistleblowing channel, personal data may be processed depending on what you choose to share. Processing of personal data related to whistleblowing channel is based on our legitimate interest.

In relation to protection of our premises, equipment and personnel

In relation to various safety and security measures, personal data is processed in order to safeguard and protect people, premises, systems, technology and equipment. Such safety measures include camera surveillance (CCTV), access control, IT and IP logs and identity checks. In this respect we may collect and process personal data such as name and other contact data, identity information, employment data and role, CCTV images, date and time logs etc. in order to ensure compliance with legal and contractual obligations and to secure and/or protect personnel and visitors at our locations and secure property, technology and equipment. In addition to providing support and safeguard in critical situations. The legal basis for such processing is our legitimate interest in safeguarding employees, premises and business operations and applicable legal and contractual requirements.

7. To who do we share this information?

We will never sell, give away or redistribute personal data to third parties, nor do we share personal data with others except for in circumstances where such sharing is necessary as part of our regular business operations and to provide our services and support to you as described herein. On this basis personal data may be disclosed in the following relations:

Categories of personal data	Examples
To other companies in the Glamox-group	As an international firm, we may share your personal data between Glamox entities to ensure the efficient operation of our group (for instance, by sourcing our shared services in the most cost-effective way) and to provide the highest quality of client services. Your personal data is shared in accordance with our Glamox Group Personal Data Transfer Agreement and GDPR. Personal data may be shared with Glamox entities on a need-to-know basis.
To professional advisors	Your personal data may be shared with professional advisors, such as banks, insurance companies, auditors, lawyers, accountants and other professional advisors.
To financial institutions	Your personal data may be shared with financial institutions providing financial services to us.
To service providers	Personal data may be shared when we outsource certain data processing activities to trusted third-party service providers for delivering services on our behalf in accordance with instructions set out in a data processing agreement with the relevant service provider. Third-party service providers are for example used for administration services, security services, consultancy purposes, recruitment services, financial services, facility management services, parking services, IT services, communication services and integrity due diligence services. In such instances, we may share your personal data with such parties to the extent necessary to perform such services.
In relation to transactions like acquisition, sales, merger/demergers	Personal data may be shared in connection with corporate transactions when we buy or sell a business or assets or part of a business or assets or in relation to any reorganization, merger/demerger, joint venture, or other disposition of our business, assets, or stock.
In relation to events	When we run an event in collaboration with a partner organization, we may need to share your personal information with the partner organization and act as joint controllers. If we do so, we will provide you with additional information about the personal data we process as joint controllers in the event related communications we send to you.
When required by law	When required by law, regulation, legal process or an enforceable governmental request, we may share your personal data for legal reasons within the Glamox Group or to public authorities or governments but only to the extent we are required to do so.

8. Transfer of personal data

The Glamox Group is located in many countries around the world and as a result personal data provided to us may be transferred to or accessed by Glamox affiliates and trusted third parties around the world. Your data may therefore be processed outside your country of residence in order to be able to fulfil the purposes set out in this privacy notice. As a result, personal data may be transferred to a country outside the European Economic Area (EEA). Transfer personal data to a third country outside of the EEA that does not provide adequate protection will not take place unless appropriate safeguards are applied, or the transfer otherwise takes place in accordance with applicable data protection legislation.

9. Retention and deletion of personal data

Personal data will be retained as long as necessary to fulfil the purposes for which it has been collected or as long as required by applicable law. If you have a contractual relationship with us, any personal data relating to you will be retained as long as necessary to enable us to fulfil our obligations relating to that contractual relationship. If you consent to certain processing, we store your personal data until you withdraw your consent or once the personal data is no longer necessary for the purpose of the processing.

If the storage purpose is not applicable, or if a storage period prescribed by applicable laws expires, the personal data are routinely blocked or erased in accordance with legal requirements.

10. Your rights as a data subject

As a data subject, applicable data protection laws and regulations afford you several rights and freedoms. If you would like to exercise such rights, please contact us at privacy@glamox.com

Within the limitation as set out in applicable laws and regulations you are granted the following privacy rights in relation to information collected about you:

- You have the right to obtain further information on our use of your personal data.
- You have the right to request access to copies of the personal data processed about you.
- You have the right to demand rectification of incorrect personal data and we advise you to inform us of any changes or discrepancies in order for us to keep the information accurate.
- You have the right to request an electronic copy of the personal data provided by you for transfer to you or to a third party designated by you (the right to data portability).
- You have the right to request deletion (the right to be forgotten) if you are of the opinion that we are storing data that should have been deleted within the limitations following from legal obligations to obtain such data until the statutory retention period has expired.
- You have the right to object to the processing, including processing for marketing purposes, where you always can opt out of direct marketing from us by unsubscribing to the newsletters or other marketing e-mails that you receive from us.
- You have the right to request that we restrict the processing of your personal data if you want us to delete the data or the processing in your view does not have a legal basis.
- You have the right to withdraw your consent at any time.
- Automated decisions and profiling are not used by us related to your relationship with us.
- You have the right to complain to the relevant data protection authority, but we encourage you to first address your concern to us, before filing such a complaint.

11. Security of processing

All personal data will be processed securely and we have implemented appropriate technical and organizational measures to ensure the availability, integrity and confidentiality of your personal data processed in order to protect your personal data against accidental or unlawful destruction, loss, alteration or unauthorized disclosure or access. Processing of personal data is strictly limited to personnel of Glamox, its controlled business units and affiliates or third-party data processors subject to data processor agreements ensuring appropriate measures to protect the confidentiality of your personal data. However, web-based data transmissions may in principle have security gaps, so absolute protection cannot be guaranteed.

12. Updates to this privacy notice

Glamox reserves the right to improve and modify this privacy notice. Revisions of this privacy notice will be published on www.glamox.com and the latest version will always be available here.