

Landsvirkjun Privacy Policy

Landsvirkjun is committed to ensuring the accuracy, confidentiality and security of the personal data processed by the company.

This Privacy Policy applies to all personal data concerning Landsvirkjun's external stakeholders, consultants, contractors, the contacts and representatives of the company's clients and suppliers, applicants for grants, participants in idea competitions and other contacts (hereinafter collectively referred to as "**you**"). The purpose of this Privacy Policy is to inform you about which personal data the company collects and how the company processes such data.

If you are uncertain of how this Policy concerns you, please contact Ingvar Christiansen, the company's Data Protection Officer, for further information. The Representative's contact information can be found in Article 11 of this Policy.

1. Purpose and legal obligation

Landsvirkjun is committed to comply with applicable data protection legislation and this Privacy Policy is based on the Icelandic Act No. 90/2018 on Data Protection and the Processing of Personal Data ("**the Privacy Act**").

2. What is personal data?

Personal data, as defined by this Privacy Policy, means any information relating to an identified or identifiable natural person, i.e. information that can be traced directly or indirectly to a specific individual. Anonymous data and information that does not relate to an identified or identifiable natural person is not considered personal data.

3. Personal data processed by Landsvirkjun about stakeholders

Landsvirkjun's communication policy is to create support and solidarity by having open communications with stakeholders. Stakeholders can be individuals, such as landowners and residents of an area, or legal entities, such as municipalities and organisations. For the purposes of achieving the legitimate aim of having open communications with stakeholders, we maintain a register of stakeholders and a communication plan, where the following data may be found on stakeholders and their representatives:

- contact information, such as name, title, telephone number and e-mail address; and
- communication history

Where a stakeholder is a landowner, we also collect data on the share of the stakeholder concerned in a land where constructions are intended to take place. Furthermore, we preserve a list of stakeholders' registrations to the company's events. The company's processing of stakeholder data is based on the company's legitimate interests.



4. Personal data processed by Landsvirkjun about consultants and contractors

The processing of data about consultants and contractors working for Landsvirkjun may depend on the nature of the project carried out by the person in question on behalf of the company.

For the purposes of establishing a contract with consultants and contractors, we always collect a name and contact information, and might, additionally, request an access to a CV. Moreover, we preserve a copy of the company's communications with consultants and contractors.

In order to ensure that everyone that is indirectly employed by Landsvirkjun, through contractors, sub-contractors or temporary work agencies, enjoys rights and benefits in conformity with laws and collective bargaining agreements, we may also ask for data regarding the terms of employment of the employees of the firms we sign contracts with. This is carried out on the basis of legitimate interests of the company.

For the purposes of improving the safety of those who work on construction sites and due to a legal obligation of the company, the company collects data on accidents and other incidents and analyses results to take corrective actions, as appropriate.

5. Personal data processed by Landsvirkjun about the contacts and representatives of clients

In order to fulfil our contracts with customers, it may be necessary to process the following personal data on our customers' contacts and representatives:

- contact information, such as name, telephone number and e-mail address;
- power of attorney;
- job title;
- communication history with the company; and
- access information from Landsvirkjun's business web.

For the purpose of forming new business connections and discover and develop new business opportunities we may also collect the following information on potential customers, advisors and influencers:

- contact information, such as name, telephone number and e-mail;
- place of work;
- job title; and
- communication history with the company

The above-mentioned data is collected based on legitimate interests of the company.

6. Personal data processed by Landsvirkjun about the contacts and representatives of suppliers

For the execution of a contract with our suppliers, and to make arrangements at the request of suppliers before concluding a contract, it is necessary for the company to collect contact information of the suppliers' representatives. Based on the company's legitimate interests, we also retain the company's communication history with our suppliers.



7. Personal data processed by Landsvirkjun about applicants for grants and participants in idea competitions

When an application is made for a grant from Landsvirkjun, whether from a social fund or other grants, or when an application is made for participation in idea competitions organised by Landsvirkjun, we consider the participation a request for signing a contract, on the basis of which it is necessary to process certain personal data. In all cases, contact information is requested, such as name, phone number and e-mail. It depends, however, on the nature of the request whether an ID-number, CV and other attachments are requested. The data which must be provided, at any given time, is marked with an asterisk in a designated application or participation form. If the applicant does not provide the necessary information, Landsvirkjun may be unable to accept the application.

8. Personal data processed by Landsvirkjun about other contacts

In our operations, we collect contact information from various contacts, such as from contacts working at institutions and authorities the company is in regular contact with. This is done based on the legitimate interests of the company to simplify communication, but the information is updated as needed at any given time.

9. Personal data processed by Landsvirkjun in relation to events organised by Landsvirkjun

The processing conducted in relation to events organised by Landsvirkjun is based on legitimate interests of the company. However, as stated in Article 15 of this policy, you have the right to object the processing of personal data which is based on legitimate interests. When many people must be contacted simultaneously, e.g. in relation to an invitation to a large event organised by Landsvirkjun, we have, in order to simplify communications, prepared a mailing list where the name, phone number and e-mail of the contacts we believe are suited for the event can be found. When you receive an e-mail regarding an event organised by Landsvirkjun, you will receive information on how you were registered to the list. In the e-mail, you will be offered to deregister from the list in a simple manner, if you do not wish to be registered. Photos may be taken at the company's events, which are subsequently displayed on the internet and other media. If our events are video recorded, we will do our utmost to notify guests at the event itself.

10. Personal data obtained by electronic surveillance

For security- and asset protection purposes and based on Landsvirkjun's legitimate interests, camera surveillance is used at the company's premises. Attention is drawn to the use of security cameras with relevant signs.

If e.g. a contractor has access to an access-controlled area at the company's premises, or on construction sites, data regarding movement on the site may be collected, in the interest of safety and safeguarding.

Information collected through electronic monitoring is not stored for more than 90 days, unless permitted by law or if the information is necessary to define, make or defend a claim.

11. Transfer to third parties

Landsvirkjun may transfer personal data to third parties in connection with their contractual relationship with the company. For example, data may be transferred to



parties providing consulting services, to accountants and to other service providers and partners.

Furthermore, personal data may be transferred to third parties that provide us with information technology services and other services that involve processing of personal data and are a part of the company's operations, e.g. because of security control and the management and preservation of data.

Our service providers and partners may be located outside of Iceland. However, Landsvirkjun will not transfer personal data outside the European Economic Area unless permitted by applicable privacy legislation, such as on the basis of standard contractual clauses or Persónuvernd's notice on states that ensure an adequate level of personal data protection.

Personal data may be transferred to a third party to the extent permitted or required based on applicable laws or rules, such as to the General Accounting Office on the basis of the authority's inspection powers. Also, personal data may be transferred to a third party to respond to legal measures such as house searches, subpoenas or a court order. Transfer may also be necessary in the event of an emergency or to ensure the safety of Landsvirkjun's employees or third parties.

12. How is the security of personal data ensured?

Landsvirkjun is a certified company according to the ISO 27001 standard on Information Security Management Systems. The scope of certification covers all employees and all activities at the company's headquarters.

In addition, Landsvirkjun seeks to take appropriate technical and organizational measures to protect the personal data of individuals. These measures are intended to protect personal data from being accidentally lost or altered and against unauthorized access, copying, use or dissemination.

13. Retention period

As Landsvirkjun is subject to a retention obligation based on the Public Archives Act No. 77/2014, the company is prohibited from disposing of or destroying any document which falls under the scope of the Act unless specifically authorized by the national archivist.

The company has obtained an authorization from the national archivist to erase certain accounting source documents. Other data is retained for unlimited period of time.

14. Changes to your personal data

It is important that the personal data processed by Landsvirkjun are both accurate and pertinent. Therefore, it is important that you notify the company of any changes that may occur to the personal data you have provided to us.

Please direct all updates to Ingvar Christiansen, the company's Data Protection Officer.

15. Your rights regarding the personal data processed by the company

You have the right to obtain confirmation whether we process personal data about you or not, and if so, you may request access to the data and information on how it is processed. You may also be entitled to obtain a copy of the data. In certain circumstances, you may request from the company that we send data which you have provided us yourself or that originates with you, directly to a third party.



Due to Landsvirkjun being subject to the obligation to retain most of the data processed by it, as further detailed in Article 13 in this Privacy Policy, your right to erasure of personal data is limited. However, in certain circumstances, you may have the right to restrict the processing of your personal data, such as if you believe that the data Landsvirkjun processes about you is incorrect. In such circumstances, you may require that while examining the accuracy of the data, the processing will be limited.

If the processing of your personal data is based on legitimate interests of the company, you also have the right to object to such processing.

Your aforementioned rights are not absolute. Thus, laws may obligate the company to reject a request for erasure or access to data. In addition, the company may reject your request in consequence of the company's rights, such as based on intellectual property rights or the rights of third parties, such as to privacy, if the company considers these rights to prevail.

In the event we cannot meet your request, the company will seek to explain why the request was rejected, taking into consideration legal restrictions which may apply.

16. Inquiries and complaint to The Data Protection Authority

If you wish to exercise the rights described in Article 15 of this Policy, or if you have any questions regarding this Privacy Policy or how the company processes your personal data, please contact the Company's Data Protection Officer, who will monitor compliance with the privacy and data protection legislation, cf. Article 17 of this policy.

If you disagree with the company's processing of personal data, you may submit a complaint to The Data Protection Authority (www.personuvernd.is).

17. Contact information

We have appointed a Data Protection Officer which oversees the enforcement of this Privacy Policy.

Below you can find his contact information:

Ingvar Christiansen
personuvernd@landsvirkjun.is
+354 515 9000

The company's contact information:

Landsvirkjun
Háaleitisbraut 68
103 Reykjavík
Iceland

18. Revision

Landsvirkjun may from time to time change this Privacy Policy in accordance with changes to applicable laws or regulations or as a result of changes in the way the company processes personal data.

Any changes that will be made to this Policy will take effect after the updated version has been published on Landsvirkjun's website.

This Privacy Policy replaces an original Privacy Policy adopted on 5 June 2018.

Reykjavík, 7 October 2020.