

## **Mowi HR Privacy Policy**

Mowi is responsible for processing personal data relating to employees, contracted workers and external consultants that is collected before, during and/or after employment relationships, work orders etc.

This privacy policy is intended to help you understand which personal data Mowi may process about you, the purpose of each processing activity, how the personal data is collected, your rights in this regard and how you may invoke those rights. Furthermore, this document will describe applicable routines relevant to the processing of your personal data, security measures and how to ensure information quality. You may also find information regarding relevant policies and procedures addressing related activities.

Personal data means any information concerning a natural person – hereinafter referred to as the data subject – e.g. name, e-mail address, telephone or evaluations that may be linked to a natural person.

Upon processing of your personal data, Mowi acts as a controller; meaning Mowi is responsible for ensuring that your personal data is processed in a responsible manner in compliance with applicable legislation, including the General Data Protection Regulation (GDPR).

### **Purpose**

The purpose of processing personal data regarding employees, contracted workers or the like, may be summarized as an exercise of HR administration. Hence, the processing is necessary for administering employment relationships - or similar relations - and to ensure that the data subject is both informed of and able to invoke all rights pursuant to applicable law and any individual and/or collective agreement.

### **Application, roles & responsibilities**

This privacy policy applies to all processing of personal data where Mowi is acting as an employer in the role of being a controller as defined in GDPR article 4 no. 7. This will include the HR department, Finance department, PayRoll department and Management on all levels within the organization.

The HR Manager of each Business Unit holds the practical responsibility for ensuring that all processing of personal data is conducted in accordance with internal routines and applicable law.

## **General Principles**

### **Overview of personal data for which HR is responsible**

#### **Categories of personal data:**

- Employee records; name, birthdate, address, phone number, etc.
- Salaries, bonus and benefits



- Recruitment and hiring,
- Position, department, business unit
- Competence development and training,
- Performance assessments
- Succession and talent mapping
- Health and welfare services
- Time and absence management
- Occupational health services
- Employee engagement surveys

### **Processing activities and routines**

The HR Manager is responsible for all processing of personal data relating to employees and/or external consultants, temps, contracted workers and the like within his or her business unit.

### **Information systems and purpose**

The HR Manager shall have a record of all the IT-systems used to support HR administration in the Business Unit and a written purpose covering the IT-systems used by the HR administration.

### **Processing and quality**

The HR Manager shall ensure that personal data is processed only to the extent necessary and verify that the quality of the personal data is sufficient, i.e. the information shall be both precise and complete.

### **Correction and deletion**

Personal data shall be corrected and deleted according to the requirements stipulated within Mowi's BCR, other internal control documents and applicable law.

### **Internal control**

Internal controls of the IT-systems supporting HR administration shall be carried out annually with the objective of establishing and maintaining an adequate level of security as well as compliance with all applicable privacy laws and internal routines. The control shall assess whether:

- a written purpose for processing exists for all categories of personal data;
- requirements for processing personal data in internal routines are complied with;
- requirements for processing personal data in applicable law are complied with;
- the processed data fulfills the necessary requirements for quality; and
- the information security level is adequate to internal routines and applicable law.

The result of internal controls shall be documented and made available upon request to the data subjects (i.e. the employees and/or external consultants, temps and contracted workers), internal audits and public authorities with a statutory entitlement to such information, e.g. the Data Protection Authorities.



## **The purpose and legal grounds for processing personal data**

### **Employee records**

Mowi will process personal data about you and your employment relationship to ensure that your rights pursuant to applicable regulations and individual and/or collective agreements are met. Hence, Mowi may process the following personal data:

- Name
- Address
- Date of birth
- Phone number
- Email address
- National ID
- Gender
- Probationary period reviews
- Absence
- Bank account number
- Bonus or commission payments
- Working hours
- Information regarding performance
- Pension and insurance schemes etc.

The above stated processing is conducted on the basis of GDPR article 6 no. 1 letter b) as the processing is necessary for the performance of a contract to which you are a party.

To the extent the processing is necessary to comply with applicable regulations, the processing will be conducted on the basis of GDPR article 6 no. 1 letter c) as the processing is necessary for compliance with a legal obligation to which Mowi is a subject. These obligations may be summarized as employer duties and obligations, e.g. ensuring that all employees make use of their entitled holiday, managing the employees' right to leave of absence, pension schemes and mandatory insurances pursuant to local law.

### **Recruitment and hiring**

During recruitment processes Mowi may process personal data regarding potential employees to the extent personal data is collected by Mowi, provided by the data subject themselves or produced as a result of the recruitment process; e.g. notes from interviews and the like. Mowi will at all times strive to confine the processing of personal data to what is necessary to effectuate the recruitment process and live up to the principle of data minimisation.

By applying for a vacant position, Mowi assumes that the applicant wants his or her submitted documents to be assessed by Mowi, as a necessary step to determine whether or not the applicant should be offered a position at Mowi. Hence, the processing is conducted on the basis of GDPR article 6 no. 1 letter b) as a process initiated at the data subject's request prior to entering into a contract.



Mowi will process personal data originating from recruitment processes until the employment relationship is terminated. After the employment relationship has been terminated, the personal data shall be deleted without undue delay, unless Mowi has legal basis to further process the personal data pursuant to GDPR article 6 no. 4 or is obliged to do so pursuant to local law.

Personal data relating to rejected applicants shall be deleted without undue delay after the recruitment process has been completed, unless the data subject has explicitly consented to the further processing of their personal data, in which cases Mowi may process the personal data for an additional 12 months or to the expiration of the consent, whichever comes first. All such extended processing will be conducted on the basis of GDPR article 6 no. 1 letter a) as the data subject has consented to the further processing of their personal data for the purpose of future recruitment.

Mowi will not engage external recruitment companies to act on Mowi's behalf in recruitment processes without ensuring that the processing of personal data is governed by a data processor agreement providing sufficient guarantees and that technical and organizational measures have been implemented.

### **Employment contracts**

Mowi is required to keep an archive of all employment contracts with current employees. Information in employment contracts may regard name, address, phone number, date of birth, accession date, salary, bonus, other benefits, taxes, position, department, business units, reporting line, and any other relevant information. Employment contracts should be stored in a secure manner at all times and be deleted upon termination of the employment relationship, unless further processing is warranted to ensure subsequent management of the relationship and to ensure compliance with applicable law.

All such processing shall be conducted on the basis of GDPR article 6 no. 1 letter b) as the processing is necessary for the performance of a contract to which the data subject is a party; by way of Mowi honoring the stipulated rights and obligations within the respective employment contract.

Mowi will continue to store employment contracts until the employment relationship is terminated. After the employment relationship has been terminated, the personal data shall be deleted without undue delay, unless Mowi has legal basis to further process the personal data or otherwise is obliged to do so.

### **Pensions and insurance**

Mowi will process personal data relevant to pension and insurance schemes and may disclose such information to external providers for the purpose of effectuating the employee's rights pursuant to local law and individual and/or collective agreements. To the extent such processing is necessary to comply with applicable regulations, the processing will be conducted on the basis of GDPR article 6 no. 1 letter c) as the processing is necessary for compliance with a legal obligation to which Mowi is a subject.



If the employees are granted better insurances and/or pension schemes than those prescribed by local law, the processing will be conducted on the basis of GDPR article 6 no. 1 letter b) as the processing is necessary for the performance of a contract to which the data subject is party.

Processing of special categories of personal data relating to pension and insurance schemes (such as e.g. health information) will be conducted on the basis of GDPR article 9 no. 2 letter b) as the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law. Mowi shall at all times ensure that such processing of personal data is protected by an appropriate level of security.

### **Employee surveys**

Mowi may require or invite employees to participate in surveys for various purposes. In all such events the employees should be clearly informed whether the responses to the survey are anonymous or not.

The legal basis for processing personal data in relation to employee surveys are the legitimate interests pursued by Mowi according to GDPR article 6 no. 1 letter f), which will be different from survey to survey. However, employee surveys may be summarized as a useful way of collecting valuable intel from a broad section of Mowi's employees disclosing their view on topics that matter to them.

All processing of all such personal data shall be confined to a set time frame and to what is necessary to obtain the purpose(s) of conducting the survey and otherwise restricted to personnel holding a functional interest in the provided answers. External survey providers shall sign a data processor agreement before any processing of personal data may begin.

### **Whistleblowing**

Mowi may process personal data relating to reported violations of the Code of Conduct, internal policies, internal routines and/or applicable law. All reports shall be processed in a confidential manner and all personal data relating to such reports - without regard to the legitimacy of the report - shall be processed in compliance with internal routines and applicable law, protecting the involved parties from unwarranted repercussions and/or disclosures.

The legal basis for processing personal data in whistleblowing cases are the legitimate interests pursued by Mowi according to GDPR article 6 no. 1 letter f), as the identification of such circumstances will allow Mowi to handle such matters in a gentle and quick manner, to avoid further breaches and ensure that the working environment is safe.

The procedure for reporting alleged or suspected violations or breaches and the procedure for handling such reports are set out in Mowi's Code of Conduct and in the Whistleblower Policy. External reporting channel providers shall sign a data processing agreement with Mowi, before any processing of personal data may begin.



**Health and union information - special categories of personal data**

All processing of special categories of personal data - such as e.g. health information or employees' union memberships - shall be conducted in accordance with GDPR article 9 as well as any other applicable law and internal routines. All such processing shall be confined to what is necessary for obtaining the purpose for which the personal data originally was collected.

**Information quality**

Personal data relating to Mowi's employees shall be precise, complete and up to date. Mowi shall remind all employees annually to update their personal data to ensure the accuracy of personal data processed by Mowi. Further provisions regarding information quality may be found in Mowi ITC Security Policy.

**Confidentiality**

HR Managers shall ensure that all staff members and external providers are informed of their duty of confidentiality, as set out in their employment contracts or applicable Non-Disclosure Agreements and that necessary routines are in place, ensuring that personal data is processed in a confidential manner.

**Disclosure of personal data**

- Mowi will not disclose your personal data with external third parties unless:
- the disclosure is required by applicable law or regulation to which Mowi is a subject;
- the disclosure is linked to one of Mowi's legitimate interests as presented under section 2; or
- Mowi has another obligation or basis for disclosing personal data to third parties.

**Place of processing and transfers to third countries located outside the EU/EEA**

Mowi processes personal data at our operating offices and all other locations where the parties involved in the processing are located. Depending on the employee's location, data transfers may involve that the personal data is being transferred to another country. Internal transfers conducted between Mowi's many business units and transfers within business units - e.g. whenever Mowi's personnel is located outside of their business unit's normal geographic location - will be conducted on the basis of the binding corporate rules (BCR) composed by Mowi pursuant to article 47 of the GDPR. The BCR ensures a legally binding document for all of Mowi's business units that expressly confer your enforceable rights as a data subject with regard to the processing of your personal data\*. If you wish to learn more about the potential transfer of your personal data, you may do so by contacting Mowi using the information provided below.

Mowi will restrict the transfer of personal data to third countries outside the EU/EEA to what is necessary to effectuate applicable employer duties and responsibilities, including the use of IT-systems that assist Mowi in paying salaries, bonuses and the like, managing educational and awareness activities etc.



Mowi uses global IT-systems available to all business units holding a functional interest in making use of these systems. Depending on if and how your business makes use of any of these global systems, your personal data may be transferred to countries like the USA, UK and Ireland. In some cases personal data may also be transferred to the development department of Cursum to conduct bug fixes and/or updates to Mowi Academy. This development department is located in the Philippines. All transfers of personal data to third countries located outside of the EU/EEA shall be governed by standard contractual clauses (SCC) as adopted by the EU Commission, to ensure appropriate data protection safeguards.

Please also note that your business unit may have implemented local IT-systems, which in turn may cause your personal data to be transferred within the EU/EEA and/or to third countries located outside of the EU/EEA. If you wish to learn more about your local IT-systems, please address the matter to the HR Manager of your business unit.

*\* Mowi has submitted the BCR to the Norwegian Data Protection Authority and is awaiting the final approval.*

### **Protection of personal data and information security**

#### **Mowi ITC Security Policy is also applicable for HR processing of personal data.**

Mowi has implemented necessary technical and organizational measures to ensure that all personal data is processed in a secure manner within the limitations of GDPR's principles pursuant to article 5; including lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality as well as accountability.

### **Access requests**

HR shall alert the Group Data Protection Officer upon receiving access requests or requests to access certain information. Mowi may request the data subject to specify which type(s) of personal data he or she is seeking and which system(s) the personal data is likely to be stored, as well as the circumstances in which Mowi has obtained the data.

Mowi shall process all requests - also if the request is not specified. The identity of the data subject shall be confirmed before an access request is granted.

Provided that Mowi processes personal data regarding employees, contracted workers or the like that is incorrect or incomplete, the personal data shall be rectified, completed, deleted or blocked, depending on what seems appropriate - also taking into account the data subject's wishes and applicable law.

### **Rights of the data subject**

Mowi processes personal data concerning employees, consultants, temps and contracted workers as stated within this HR Policy. Within this context, the data subject will be entitled to the below stated rights, pursuant to GDPR chapter III:



- You have the right to obtain a confirmation of which personal data Mowi processes about you and to access those personal data, as well as the purpose of the relevant processing.
- You have the right to verify and where applicable rectify any inaccurate personal data concerning you and to have incomplete personal data completed.
- You have the right to obtain restrictions on processing of personal data concerning you.
- You have the right to object to the processing of personal data and to withdraw any previously given consent(s). Please note that the withdrawal of a consent does not affect the lawfulness of any processing performed previous to the withdrawal.
- You have the right to erasure of personal data concerning you. Upon request of erasure Mowi will erase all personal data concerning you unless Mowi otherwise is obligated or has legal grounds to further process the personal data.
- You have the right to lodge a complaint and to bring a claim before the competent data protection authority. Information regarding when and how to lodge a complaint may be found [here](#).

If you wish to exercise any of these rights or have questions regarding how to invoke such rights or the contents of them, please let us know by using the contact information provided below.

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