



Privacy Policy

Nordic Bulkiers is committed to protecting personal data and respecting privacy. This policy provides information about the how we process personal data as part of our business processes, individual rights, and how to contact us.

Nordic Bulkiers AB ("Nordic Bulkiers"), corporate identity no. 556058-0572, is the data controller responsible for processing personal data in accordance with this policy.

1 How We Process Personal data

Our handling of personal data may differ depending on whether you are an employee, customer, supplier or other interested party. This document accounts for the details of this process.

1.1 Sources of Collected Data

1.1.1 Personal Data Provided by Employees

Employees providing personal data may occur in conjunction with the contract of employment being entered into, renewal or change of employment, and in other contexts where the employment relationship requires data collection in order for Nordic Bulkiers to fulfill its part of an agreement. Examples of information collected are name, personal identity number, residential address, telephone number, bank account information, contact details of next of kin.

1.1.2 Personal Data Provided by Third Parties

Since employees receive public services from government bodies, such as the Social Insurance Agency, we therefore process personal data from third parties. This may include data such as parental leave, sick leave, seizure orders, current income and historical earnings.

1.2 Sharing of Personal Data

1.2.1 Internal Corporate Entities

Personal data may be shared with internal corporate entities in order to perform a task related to an operational activity, or as part of Nordic Bulkiers' commitment as an employer. Departments possibly in need of personal data are the HR- and Finance Department.

Wage-setting managers may be in need of both current and historical personal data to fulfill the duties assigned to them as a staff manager. Moreover, during a wage review (as a counterpart in union negotiations), we may be forced to divulge personal data to the local union branch.

1.2.2 External Parties

External parties such as customers and suppliers may receive some of your personal information, such as name, professional e-mail address and phone number. No private information is provided to the company's interested parties, unless authorities should request such information.

If applicable, we will share your personal information with recipients acting independently in relation to the services we provide to you. Your personal information may thus be communicated to the following recipients:

Recipient	Purpose	Legal Basis
Government bodies (such as the Tax Agency, the Social Insurance Agency, the Enforcement Authority, the Police Authority)	To provide information in accordance with legal requirements or governmental decisions	The company has legal obligations to comply with the requirements of authorities and the judicial system
Courts of law	To provide necessary information in connection to litigations	The company has legitimate interests in establishing and defending legal claims
Payroll administrators	To apply measures in order to fulfill the responsibilities of the company	Upholding employment contract provisions
Suppliers of benefit- and business services	To provide the employee benefits to which the employee is entitled	Upholding employment contract provisions
Pension management companies	To fulfill obligations concerning pension towards the employee	Upholding employment contract provisions
Customers and suppliers	To establish and maintain good customer and supplier relationships	Serving the best interests of the company

1.3 Types of Data Collected and Why It Is Collected

To offer an understanding of how we process personal data in our different departments, this section details the types of data collected and the purpose behind it being collected.

1.3.1 Upholding Employment Contract Provisions

In order for Nordic Bulkers to fulfill contractual obligations toward employees, personal data needs to be handled.

Reasons for personal data being processed:	Exemples of personal data being processed:
Salary payout	<ul style="list-style-type: none"> • Name • Personal identity number • Residential address • Payroll number • Telephone number • Contact details of next of kin • Salary • Bank account information • Employment rate
Salary income tax	
Employer's contribution/Payroll tax	
Pension contribution	
Providing benefits	
Providing business services	
Business analysis from an equality perspective	

Legal Basis

The processing of this personal data is necessary to fulfill contractual obligations toward employees.

Data Retention Period

Data will be retained until employment has ceased, or until such that no obligations remain after employment has been terminated.

1.3.2 Further Elements of Upholding Employment Contract Provisions

In order to meet any requirements arising as a result of the employment contract, we need to process your personal data.

Reasons for personal data being processed:	Exemples of personal data being processed:
Deferring to information put out by authorities	<ul style="list-style-type: none"> • Name • Personal identity number • Medical certificate • Ergonomic data • Telephone number • E-mail address • Personal qualities and performance • Salary • Bank account details
Submitting information requested by authorities	
Submitting information to payroll administrators	
Ensuring the correct identity of the employee	
Monitoring performance reviews and action plans	
Offering advancement within the company	
Providing ergonomically adapted equipment	

Legal Basis

The processing of this personal data is necessary to fulfill contractual obligations toward employees.

Data Retention Period

Data will be retained until employment has ceased, or until such that no obligations remain after employment has been terminated.

1.3.3 Employee Hiring

In order for Nordic Bulkera to hire skilled employees who, through their qualities and traits, fit into the corporate structure, we may need to process your personal data.

Reasons for personal data being processed:	Examples of personal data being processed:
Hiring when vacancies occur	<ul style="list-style-type: none">• CV• Name• Personal identity number• Telephone number• E-mail address• Name of reference• Contact details of reference
Hiring during holidays	
Hiring during peak business demands	
Hiring during expansion	
Hiring during restructuring	
Hiring in order to re-distribute work load	

Legal Basis

The processing of this personal data is necessary to fulfill contractual obligations toward employees.

Data Retention Period

Data will be retained until employment has ceased, or until such that no obligations remain after employment has been terminated.

1.3.4 Maintaining a Customer Oriented Business Model

The processing of personal data may be necessary in order for Nordic Bulkera to maintain its hallmark level of quality and customer service.

Reasons for personal data being processed:	Examples of personal data being processed:
Providing a contact person to customer	<ul style="list-style-type: none">• Name• Telephone number and e-mail address
Providing a contact person to suppliers	

Legal Basis

The processing of this personal data is necessary in order to maintain a customer oriented business model with high quality service.

Data Retention Period

Data will be retained until employment has ceased, or until such that circumstances have changed.

1.3.5 Providing High Quality Services

In order to supply services to employees and customers, we process personal data of interested parties.

Reasons for personal data being processed:	Examples of personal data being processed:
Transportation	<ul style="list-style-type: none"> • A contact person's name • A contact person's e-mail address • A contact person's telephone number • A contact person's job title • A company's bank details • A company's corporate identity number • A company's contact details
Storage	
Paying invoices	
Issuing invoices	
Offering technical solutions	
Offering sought after quality	

Legal Basis

The processing of this personal data is necessary in order to fulfill one or several of obligations owed to interested parties.

Data Retention Period

Data will be retained until employment has ceased, or until circumstances have changed.

1.4 How Long We Will Keep Your Personal Data

Unless a specific data retention period is mentioned in chapter 1.3 above, we will only save your personal data as long as it is required to fulfill our part of either an employee- or a business relationship. If the relationship requires Nordic Bulkera to commitments after the expiry of the relationship, the retention of personal data will continue until any such commitments no longer remain. In the case of business relations, personal data retention shall cease when the business relationship is no longer likely to be resumed or when contact persons at existing partners have terminated their employment.

Personal data relating to contact persons at organizations we no longer have business relationships with may not be stored for longer than the current year and three years prior.

1.5 How We Handle Personal Identity Numbers and Co-Ordination Numbers

We will process your personal identity number and/or co-ordination numbers only when reasons to do so are clearly justified, such as secure identification. Essentially, this employment relationship applies to time reporting for payroll payments.

Other cases when we process personal identity numbers and/or co-ordination numbers are during negotiations, contractual disputes, or other similar cases, such as when agreements are made between employer and employee, when special assignments are awarded and accepted in order to request login information for other connections, such as the Swedish Tax Agency. Personal identity numbers are also used to maintain accurate and up-to-date information about you.

2 Security Measures to Keep Your Personal Data Safe

We employ appropriate security measures to ensure that your personal data is not manipulated, lost or destroyed, or that unauthorized persons may gain access to them.

2.1 Physical Data

Physical documents containing personal data are processed only by those who perform tasks where such access is necessary. With the help of a structured organizational chart and a clear attestation, no personal data is processed unnecessarily.

Documents containing sensitive information such as personal identity number, salary, bank details, or other personal data normally available for the employment relationship are filed in locked safes.

Physical documents containing personal data no longer needed are shredded.

2.2 Electronic Data

Personal data, received by Nordic Bulkera via e-mail or other electronic platforms, is processed solely by those whose task it is to process them. Deviations from this procedure will be reported to one of the company's data protection officers. Electronic data deriving from operational activities are processed continuously over the company's internal network and server structure and is safeguarded by firewalls and other protective measures.

Sensitive electronic data, including personal identity number, salary, bank details, or other personal information are stored with restricted access.

Electronic documents containing personal data no longer needed are deleted from the servers.

2.3 Data Contained in E-mail

We handle our e-mail accounts knowing personal data may be stored without the user having knowledge about it. We have educated our employees using e-mail in how to handle messages containing personal data in their daily operation. When the content of a message is no longer of use it must be deleted.

Furthermore, we have implemented a policy of archiving that entails gradually clearing personal data no longer used for business purposes.

3 Where Your Personal Data is Processed

We always process your personal information within the EU/EEA and always strive to procure and use systems with high security.

Processing of storage over the internal network occurs on servers located in Sweden. Further electronic processing include:

- IT systems provided by customers to be used for operational activities.
- IT systems hosted by suppliers within the EU/EEA.

This processing is necessary for our legitimate interest in providing reliable and high quality services with secure technology. We ensure an adequate level of protection for your personal data by applying the European Commission's standard contractual clauses.

You may gain access to the standard contractual clauses, as well as more information about these by visiting the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.

4 Your Legal Rights

As a physical individual, you have certain rights in relation to the processing of your personal data. These rights are, in more detail, explained below.

4.1 Right to Access

We conduct our business with outmost transparency, which, of course, also includes how we process your personal data. If you want insight into how we process, store or analyze your personal data, you might request access to such information at any time. You also have to right to know the purpose of us processing your personal data, what types of data that are processed, who, if any, might receive your personal data, the data retention period and/or the criterions which the retention period is based on, as well as information on from where the personal data was mined or received.

In order to verify your identity and/or pinpoint what information you want to know, we might reply on inquiries with further questions. We will answer your requests without unnecessary delay and within 30 days.

4.2 Right to Amend

You always have the right to demand amendment of personal data which is incorrect. Within the boundaries of the stated purpose, you always have the right to complement any incomplete personal data.

If this is possible, or as long that it doesn't cause a disproportionate exertion for us, we will notify the recipients, who we sent your personal data to, that you have requested a correction of the information.

4.3 Right to be "Forgotten"

As an individual, you have the right to, in certain instances, be "forgotten" or deleted from the registry. These instances are:

- The data is no longer necessary to fulfill the purposes for which they have been collected or processed.
- You oppose that we truly have a legitimate interest or that have another legitimate interest that outranks the one you originally opposed.
- Personal data have not been processed in accordance with current regulations.
- Personal data must be deleted in order to comply with a legal obligation to which we are subject.

However, despite your request for deletion of your personal data, we are entitled to continue processing your personal data and not to comply with your request, if the processing of your personal data is necessary to:

- Fulfill a legal obligation to which we are subject.
- Determine, enforce or defend legal claims.

If this is possible, or as long that it doesn't cause a disproportionate exertion for us, we will notify the recipients, who we sent your personal data to, that you have requested a deletion of the data.

4.4 Right to Restriction

You have to right to request that the processing of your personal data is to be restricted if:

- You contest the correctness of the personal data we process and give us enough time that allows us to check if the personal data is correct.
- The processing of your personal data is illegal but you oppose the removal of personal data and instead request a processing limitation on our part.
- We no longer need the personal data to fulfill the purpose of the processing, but you need the information in order to determine, enforce or defend legal claims.

If the processing has been restricted in accordance with any of the aforementioned situations as basis, we may, in addition to the actual storage, process the data to determine, enforce or defend legal claims, to protect someone else's rights or if you have given your consent.

If this is possible, or as long that it doesn't cause a disproportionate exertion for us, we will notify the recipients, who we sent your personal data to, that you have requested a limitation of processing the data.

We will inform you in advance if the limitation of personal data processing ends.

You are entitled to object to processing personal data about you based on interest balance. In such cases, we will discontinue treatment if we can not show a compelling legitimate reason for the current treatment that weighs heavier than your interests, rights or freedoms. Otherwise, we may only process the data to determine, exercise or defend legal claims.

4.5 Right to Object to Certain Types of Processing

You are entitled to object to us processing your personal data on the basis of conflicting interests. In such cases, we will discontinue the processing if we can't show a compelling and legitimate reason for the current processing that weights heavier than your interests, rights or freedoms. Otherwise, we may only process the data to determine, exercise or defend legal claims.

4.6 Right to Data Portability

If our right to process you personal data is based on the fulfillment of commitments in an agreement with you, you have to right to request the data relating to you, and which you have provided to us, to be transferred to another data controller (see, "data port"). One condition is that the processing can be automated and that it is technically possible.

4.7 Complaints to the Supervisory Authority

If you believe that we are processing your personal data incorrectly, you may submit your complaint to the regulatory authority.

5 How to Contact Us

If you have questions regarding the processing of your personal data, or if you want to exercise any of your legal privacy rights connected to us processing your personal data, you are welcome to contact us using the contact information below, or our contact form [here](#).

Data Controller's Contact Information

Nordic Bulkiers AB (Nordic Bulkiers)

556058-0572

Gullbergsstrandgata 6

411 04 Gothenburg

031 - 63 97 00

www.nordic-bulkiers.se/index.php/contact-us

6 Adoption and Amendment of the Privacy Policy

The privacy policy was adopted by Nordic Bulkiers AB the 30th of April 2018.

The latest version of our privacy policy can always be reached via our website www.nordic-bulkiers.se/privacy. When data processing purposes are updated, you will be informed and asked to approve the new purpose via e-mail.