



## Nordic Bond Pricing AS – Privacy Statement

Nordic Bond Pricing AS (NBP) is paying the greatest attention to protecting your individual rights and personal data as a data controller. Even though Nordic Bond Pricing's business model is not primarily based on the processing of personal data as a business-to-business operation, data protection is central in our daily operations. This privacy notice seeks to provide you with important information regarding your individual rights and why and how we use personal data to carry out our services and obligations.

This Privacy Notice covers the following areas:

### 1. NBP as a data processor

You are always welcome to contact Nordic Bond Pricing AS with inquiries relating to data protection. Contact us at [info@nordicbondpricing.no](mailto:info@nordicbondpricing.no) or by mail to: Nordic Bond Pricing AS, Postbox 1470 Vika, 0116 Oslo, Norway. For further general information relating to your individual rights and data protection, please contact the Norwegian Data Protection Authority (Datatilsynet).

### 2. What type of personal data do we collect, and why do we collect it

What type of personal data are we collecting?

We collect personal data when entering into new client agreements. To manage ongoing client relationship and service, we may also collect personal data relating to other persons involved in the client relationship. We will also collect relevant information that you have shared with us such as emails and post, to carry out our services. In addition to the data we collect from you, we may also collect publicly available data from third parties. Data collected from third parties are always minimized, and only used to carry out services. Third-party sources may be registers held by governmental agencies (tax authorities, company registration offices, etc.), or similar public sources relating to financial and ownership data. As a business-to-business company, we will only collect the following categories of personal data:

- Contact information: name, company address, phone number, and postal address.
- Financial and legal information: Ownership structures and financial statements.

Why do we collect personal data, and how do we use it?

We collect and use your personal data to fulfil contractual and legal obligations, where ongoing communication with all clients is important. The collection of personal data is vital to be able to verify and set up new client agreements and to fulfil legal obligations relating to reporting requirements.

Performance of a contract:

- To be able to verify and set up a new client agreement.
- Client communication and service throughout the client lifecycle.
- To be able to carry out pricing and index services.

Legal obligations:

- Bookkeeping requirements.
- Tax authorities reporting and other relevant authorities.
- Other regulatory obligations relevant to index administrators under the EU 2016/1011 Benchmark Regulation.

Personal data may also be processed in relation to marketing or reporting of our services. Where we might use personal data for marketing or reporting purposes, you will always have the possibility to opt-out from the marketing or reporting activity. We will never process any type of sensitive data, and we urge you never to share or send us any sensitive personal data.

### **3. Automated decision-making**

We are not using any automated decision-making processes relating to personal data in the course of our operations.

### **4. Whom we may disclose your personal data to, and data transfer**

We may share personal data with others such as authorities and contributors (NBPs data contributors). All disclosure and sharing of personal data will always be performed according to applicable data protection regulations and secrecy obligations. Disclosure of data to authorities may include data relating to tax, police enforcement, or other relevant legal purposes. Disclosure of data with third parties will only be made with our selected suppliers and vendors that are carrying out services on behalf of us such as IT, hosting, and support. Personal data shared with third parties will never be used for marketing, or any other purposes, other than what is strictly necessary to carry out our services.

### **5. How we protect your personal data**

Protecting personal data is of crucial importance to us, and our internal control framework, business processes, and systems are adapted to safeguard the processing of personal data. Data protection can be divided into three general areas:

- **Confidentiality:** We will always protect your data from unauthorized access, loss, and related misuse.
- **Integrity:** We will always protect the integrity of personal data by assuring accuracy and completeness.
- **Availability:** We will always ensure that personal data is readily available when needed by preventing unwanted disruption or related failures.

### **6. Privacy rights**

Subject to any legal preconditions, the applicability of which have to be assessed in each individual case, data subjects have the rights as follows. Data subjects have right to get access to their personal data and may request the same in writing at the address of the NT Group companies, respectively. In addition, data subjects have the right to

- request that personal data is rectified or erased,
- object to specific processing,
- request that the processing be restricted and
- receive personal data provided by themselves in machine-readable format.

Data subjects are also entitled to lodge complaints with the relevant supervisory authority if dissatisfied with the processing carried out.

### **7. Cookies**

We use cookies only to manage and improve the performance and functionality of our webpage and related services. We will never use cookies for marketing purposes.

## **8. How long do we keep your personal data, and why**

The right to the erasure of personal data is central to protect your individual rights and data. We will only keep your personal data if they are needed for our obligation to fulfil a contractual obligation, or as stated by regulatory requirements.

## **9. Privacy Notice updates**

Any changes made to this privacy notice will be updated on our website and will be communicated to our clients in the case of more extensive changes.