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# Data protection policy – Employees

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Ölgerðin Egill Skallagrímsson hf. has committed itself to ensuring reliability, confidentiality, and the security of employees' personal information. This data protection policy is intended to inform employees which personal information the company collects, how the company uses such personal information and who is able to access the information.

This data protection policy applies to the personal information of all current and former employees of Ölgerðin. This data protection policy refers to employees as "you" and the company as "us".

If you have questions as to how this policy pertains to you, please contact the CIO, or send an e-mail to [personuvernd@olgerdin.is](mailto:personuvernd@olgerdin.is) for further information.

### **1. Purpose and legal requirement**

Ölgerðin seeks to meet all aspects of the Data Protection Act, and this policy is based on Act No. 90/2018 on Data Protection and the Treatment of Personal Information ("the Data Protection Act"), with later amendments.

### **2. What is personal information?**

Personal information as pertains to this policy includes any information on an identified or identifiable individual, i.e., information that can be traced directly or indirectly to a particular individual. Data which cannot be traced to a specific individual is not considered personal information.

### **3. Personal information collected and processed by Ölgerðin**

We collect and store various types of personal information on our employees. Varying personal information may be collected depending on the employee, and processing and collection of personal information may depend on the nature of the position.

The following are examples of personal information which Ölgerðin processes on employees:

- Contact information, such as name, ID No., address, phone number and e-mail address.
- Applications, references, and information from job interviews.
- Information on education, training, and work experience.
- Information on criminal record:
- Employment contracts.

- Information on salary and benefits and other related information, such as account information, salary level, per diem and more.
- Information on labour union membership and pension funds.
- Information from employee reviews.
- Information on work-related accidents.
- Information on emergency contacts.
- Information on warnings.
- Time stamps and information on employee attendance.
- Information on sick days.
- Information from drug and alcohol testing, as applicable.
- Information on mobile phone use.
- Information on employee transactions through the online store.
- Analysis of performance and productivity of employees.
- Information relating to traceability in the production process.
- Information on deviations.
- Pictures of employees for use in marketing.
- E-mails to e-mail addresses owned by Ölgerðin; and
- Information that may come from electronic surveillance, i.e., on the movement of employees through the building and in the company's vehicles, actions in systems and Internet use.

In addition to the information above, Ölgerðin may also collect and process additional information that employees themselves provide the company as well as information that is necessary to its operation.

Further information on the company's processing of information from security cameras, vehicle monitors, voice and arm scanning systems, access control systems and e-mails can be found in the company's rules on electronic surveillance [link].

#### **4. Where does the information come from?**

As a general policy, Ölgerðin acquires personal information directly from employees. Information may in some instances come from a third party. For instance, information on use of tax comes from the tax authorities, information on employees' licences to use heavy equipment comes from the Administration of Occupational Safety and Health and information on deviations may be provided by customers. Should an employee be required to take a drug and alcohol test, information on the results is provided by a service provider. In instances where personal information is acquired from a third party, the company will seek to inform employees of such.

#### **5. Why do we collect personal information and on what basis?**

We collect personal information on employees primarily to meet our requirements according to employment contracts, on the basis of permissions/requirements as stipulated by law and/or on the basis of the company's lawful interests.

The processing required to fulfil requirements per the employment contracts pertains to the following information:

- Contact information, such as name, national ID No., address, phone number and e-mail address.
- Employment contracts.
- Information on salaries and benefits and other related information, i.e., account information, withdrawals, per diem and more.
- Time stamps and information on employee attendance.

Information processed on the basis of the employee's employment contract are necessary so that the company can fulfil its duties toward the employee and vice versa, i.e., regarding the payment of wages or to assess an employee's ability to complete a certain job. Should the Ölgerðin employee fail to provide the necessary information, the company may be unable to fulfil its requirements, or this may lead to a change in the employee's required tasks or position within the company. Information on the employee's purchases through the online store, Egilsbúð, or the vending machines are processed in relation to their transactions with the company.

Ölgerðin may also collect and process personal information on the basis of the lawful interests of the company, including the planning of Ölgerðin operations and guaranteeing traceability in productions. For that purpose, the company processes information on deviations, performance, and productivity of employees. The company

may also have lawful interests in ensuring workplace safety through electronic surveillance, see further [link to rules on electronic surveillance], and through the processing of further personal information, i.e., health information for specific roles that have extra security measures due to their nature. That processing of information on physical health may be necessary for the company to restrict, make or defend itself from a claim.

Ölgerðin may in some instances process personal information on the basis of legal requirements, i.e., work legislation or tax legislation. This includes information on work-related accidents and information on pension funds and labour unions.

The company also requests information on your next of kin, on the basis of your interests, should a situation arise where the respective person must be contacted.

In instances where the collection and processing of personal information requires the approval of the employee, i.e. relating to the publishing of pictures for marketing purposes, the employee is always permitted to revoke his or her approval. All communications relating to such a revocation shall be directed to the Managing Director of Communications or send an email to [personuvernd@olgerdin.is](mailto:personuvernd@olgerdin.is).

## **6. Provision of personal information to third parties**

Ölgerðin may provide personal information on employees to contract and other third parties, i.e., companies working in workplace safety and health, insurance companies and consulting firms, relating to the work they do for the company that pertains to the employment contracts. Personal information may also be provided to a third party that provides us with information technology services or other services relating to production and is a part of the company's operations. Our business partners may also request specific information on Ölgerðin employees. We ensure that we limit how much personal information we provide too only that which is necessary.

These third parties may be located outside of Iceland. Ölgerðin will not, however, submit information outside the European Economic Area unless it is permitted on the basis of the relevant personal information laws, i.e., on the basis of standard contract terms, your approval or the Data Protection Agency's register of states that provide adequate protection of personal information.

Ölgerðin may submit your personal information to third parties to the extent that is authorised or required on the basis of the relevant laws or rules, i.e., to the Administration of Occupational Safety and Health in case of a work-related accident, to the Icelandic Food and Veterinary Authority if information is requested on production processes and to labour unions and pension funds relating to premiums. Your personal information

may also be handed over to a third party in response to legal actions such as searches, subpoenas, or court rulings. Information may also be provided if necessary, during an emergency or to ensure the safety of Ölgerðin employees or third parties.

## **7. How is the security of personal information guaranteed?**

Ölgerðin aims at taking the relevant technical or organisational action to protect personal information with particular consideration for its nature. These actions are intended to protect personal information from being lost or accidentally altered or from unauthorised access, copying, use or distribution. Examples of security measures taken by Ölgerðin are controlled access to the company's systems.

## **8. Storage of personal information**

Ölgerðin seeks to store your personal information for only as long as is fit for purpose, unless otherwise required or permitted by law.

Information in employment contracts is stored for 14 years after the end of employment, based on the legal interests of the company in being able to defend itself against a potential claim by a former employee.

The same applies to information that may affect the company's decisions regarding employee salaries.

Information on work-related accidents is kept for 20 years from the accident event but may be kept longer if the accident was serious.

Information on the employee's pension fund, attendance, queries from his or her labour union and information from resignation letters are kept for four years after the end of employment. Deviations and other necessary logs regarding to the person's work for Ölgerðin, i.e., pertaining production, are kept for as long as is necessary to protect against potential claims from third parties.

Other information created through the employment contract is deleted at the end of employment, except for basic information such as contact information and the duration of work for the company, which is kept indefinitely.

## **9. Changes and corrections to personal information**

It is important that the information kept on employees is both correct and relevant. Therefore, it is important that you notify the company of any changes to your personal information while you work for the company.

Employees have the right to the correction of unreliable personal information. With consideration of the purpose of processing of personal information, an employee also has the right to have his or her incomplete information completed, including through the provision of further information.

Please direct any updates to the Human Resource Department.

## **10. Your rights regarding your personal information processed by the company**

You have the right to receive confirmation as to whether or not we process your personal information, and if so, you may request access to your information and information on how the processing takes place. You may also have the right to receive a copy of the information. Under certain circumstances, you may request that the company send information that you yourself have provided or which has come from you, directly to a third party.

Under certain circumstances, you may request your personal information be deleted without delay, for example when the storing of information is no longer necessary to fulfil the purpose of the procedure or because you revoke your approval for the processing of personal information, provided no other permission provides the basis of such processing.

Should you not want your information deleted, i.e., because you need it to defend yourself in a claim, but nevertheless want it to be processed no further by the company, you may request that its processing be restricted.

If the processing of your personal information is based on the legal interests of the company, you also have a right to object to that processing.

The aforementioned rights are, however, not implicit. There may be laws in place that oblige the company to deny your request to delete or access data. The company may reject your request based on the rights of the company, i.e., on the basis of copyrights, or the rights of other parties, i.e., on the right to privacy, should the company find that those rights take precedent.

Should a situation arise where the company cannot meet your request, the company will seek to explain why the request was denied, however with consideration for restrictions based in legal obligations.

## **11. Employee queries and complaints to the Data Protection Agency**

If you seek to exercise your rights as described in Article 10 of this policy or if you have questions regarding this data protection policy or how the company treats your personal information, please contact the CIO or send an e-mail to [personuvernd@olgerdin.is](mailto:personuvernd@olgerdin.is)

If you are dissatisfied with the company's processing of personal information, you may notify the Data Protection Agency ([www.personuvernd.is](http://www.personuvernd.is))

## **12. Contact information**

We have appointed the CIO to monitor the execution of this data protection policy.

Contact information for the company:

Ölgerðin Egill Skallagrímsson hf.

Grjótháls 7-11

110 Reykjavík

## **13. Review**

Ölgerðin may change this data protection policy in accordance with changes to the relevant law or regulation or in accordance with changes in how the company uses personal information.

Any changes that may be made to the policy take effect after the updated version has been presented to employees in a demonstrable manner.

This data protection policy was enacted on 15.05.2018.