



Statement of DNV as Data Controller in Business Assurance

In the course of DNV activities, we may receive and process personal data. DNV is committed to processing such data in a transparent manner and in accordance with applicable laws and regulations on the protection of personal data, such as the EU General Data Protection Regulation ('GDPR'). For a complete overview of how we handle and protect personal data, we refer to our privacy statement as published on <https://www.dnv.it/privacy/index.html>.

In relation to the services provided, we are however for our regular services no data processor, but an independent data controller, which can be explained as follows.

When an organisation contracts another organisation to provide a service to it the respective does not necessarily mean that this other organisation (e.g. DNV) becomes a data processor in every case. Whether DNV is a data processor or a data controller in providing service to its customers depends on the roles and responsibilities in relation to the processing. In order to be a data processor, Art. 28 GDPR stipulates that a data processing on behalf is only given, when a (e.g. customer) clearly instructs another company to conduct specific operations upon its personal data.

For our management system certification, personnel certification and training, product assurance and verification services, we work under a range of professional and contractual obligations that oblige us to act independently and take responsibility for any personal data we process. We may for example have to look at competences, give a general statement of confidence or verify a supplier's processes against certain customer specific requirements. In order to be able to do so in an independent way, we need to be able to set the purposes and means for the processing of personal data, and not only work under the instruction and supervision of our customer. As a mere data processor, we would not be able to guarantee that our services are provided in an independent way.

Please note that this does not mean that your personal data is therewith not sufficiently and adequately protected when being processed by DNV. To the contrary, DNV is highly committed adhere to the GDPR and treats your personal data in line with all legal requirements DNV GL is subject to. In line with the GDPR we have established a personal data protection management system that reflects the governing principles related to the processing of personal data. Through the Binding Corporate Rules approved by Datatilsynet (Norwegian Data Protection Authority) we ensure that all our related legal entities are committed to the highest level of personal data protection as well.

Our Global Data Protection Officer and the Group Compliance team monitor technical and legal developments and drive personal data protection awareness in the organization. Moreover, our IT infrastructure is ISO/IEC 27001 certified therewith guaranteeing you, that security is our top priority.