

Employee Privacy Policy CCPA (California relevant only)

Last Updated: January 1, 2020

Introduction

This Employee Privacy Policy (the “Privacy Policy”) contains the policies, procedures, and practices to be followed by Wallenius Wilhelmsen ASA, and any of its present or future subsidiaries (the “Company”, “Wallerius Wilhelmsen”, “we”, “us”, “our”) pertaining to the collection and use of personal information of a natural person who is applying for employment from Wallenius Wilhelmsen, employed by Wallenius Wilhelmsen, serving as a director, owner or officer of Wallenius Wilhelmsen, or acting as a contractor of Wallenius Wilhelmsen (the “Employee”, “you”, “your”).

The Company is committed to protecting the privacy of our Employees (to the extent applicable, ‘Employees’ includes Applicants to work positions) and wants you to understand how and why we collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Employee (“Personal Information”). For purposes of this Privacy Policy, Personal Information only includes such information that is collected and used by the Company within the context of your role or former role as an Employee.

The security and protection of your Personal Information is important to us, and we take administrative, technical, and physical safeguards to protect your Personal Information from unauthorized access, misuse, accidental loss, or alteration.

What Information Do We Collect?

Depending on your relationship to us, we will collect Personal Information to various extents.

In the previous 12 months, we have generally collected the following categories of Personal Information for the stated purpose(s):

Categories of Personal Information¹	Reasons for Collection
Identifiers Real name, unique identifier, email, SSN, etc	• Administer the Employment/Service Relationship • Comply With Legal Obligations • Facilitate Communications and Efficiency • Provide Benefits • Ensure the Safety of People, Facilities, and Property

¹ Categories of Personal Information are as defined in Cal. Civ. Code § 1798.140(o).

Categories of Personal Information¹	Reasons for Collection
Personal Information Info that identified, relates to, describes, reasonable associated with, etc	• Administer the Employment/Service Relationship • Comply With Legal Obligations • Facilitate Communications and Efficiency • Provide Benefits • Ensure the Safety of People, Facilities, and Property
Protected Classifications	• Administer the Employment/Service Relationship • Comply With Legal Obligations • Facilitate Communications and Efficiency • Provide Benefits • Ensure the Safety of People, Facilities, and Property
Commercial Information Records of personal property, products or services purchased, etc	• Facilitate Communications and Efficiency • Provide Benefits
Biometric Information	• Provide Benefits • Ensure the Safety of People, Facilities, and Property
Internet or Other Electronic Network Activity Information Browsing history, search history, or consumers interaction with an internet website, application, etc.	• Facilitate Communications and Efficiency • Provide Benefits
Geolocation Data	• Facilitate Communications and Efficiency • Provide Benefits • Ensure the Safety of People, Facilities, and Property
Audio and Sensory Data	• Administer the Employment/Service Relationship • Comply With Legal Obligations • Facilitate Communications and Efficiency • Provide Benefits • Ensure the Safety of People, Facilities, and Property
Professional and Employment-Related Information	• Administer the Employment/Service Relationship • Comply With Legal Obligations • Ensure the Safety of People, Facilities, and Property

Categories of Personal Information ¹	Reasons for Collection
Educational Information Information that is not publicly available PII as defined under FERPA	• Administer the Employment/Service Relationship
Inferences Drawn From Other Information From this section to create a profile about a consumer reflecting preferences, characteristics, behavior, attitudes, abilities, etc.	• Facilitate Communications and Efficiency • Provide Benefits

Reasons for Collection

a. Administer the Employment/Service Relationship

As your employer, the Company needs to keep and process Personal Information about you for normal employment purposes. The Personal Information we hold and process will be used for our management and administrative uses only, on a need-to-know basis. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, while you are working for us, at the time when your employment ends and after you have left. This includes using Personal Information to enable us to comply with payroll processing, employment contracts (if applicable), to comply with any legal requirements (associated with the employment or service relationship), to provide you with benefits, ensure your safety, and to protect our legal position in the event of legal proceedings. This Personal Information we collect from you is necessary for the management of the employment or service relationship. If you do not provide this information, we may be unable to comply with our obligations in some circumstances and may not be able to employ or engage you.

b. Compliance with Legal Obligations

In certain situations, we may need to collect and process your Personal Information to comply with our legal obligations. This includes:

- Processing your demographic information in order to monitor compliance with equal opportunity and non-discrimination policies;
- Processing information relating to your health, which could include reasons for absence and doctor's reports and notes, reasonable accommodation requests, in order to comply with our health and safety and occupational health obligations; and/or
- Processing information relevant to any alleged violations of the Code of Conduct or other Company policies necessary to investigate allegations and institute disciplinary action as is required.

The Company may be subject to certain laws and regulations relating to privacy and information security in more than one jurisdiction in which Employees reside. If any term, covenant, condition, or provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid, void, or unenforceable, it is the intent of this Privacy Policy that the scope of the rights and obligations of the Privacy Policy be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable and the remainder of the provisions of the Privacy Policy will in no way be affected, impaired, or invalidated as a result.

c. Facilitate Communications and Efficiency

The Company uses various tools and platforms that allow Employees to more easily communicate with each other and to more efficiently access and share various types of work product and schedules.

These tools and platforms may collect and share internally contact information and company profile pictures; log certain preferences and actions; collect your geolocation; and create user profiles that allow Employees to track their efficiency and performance.

d. Provide Benefits

Wallenius Wilhelmsen offers Employees a variety of benefits, including benefits related to healthcare and retirement savings. In doing so, the Company collects Personal Information such as identifiers, personal information, protected classifications, biometric data, geolocation data, and employment information. If Employees take advantage of other benefits, such as wellness and fitness-related benefits, the Company may also collect additional biometric and sensory information. When you participate in certain benefits programs, the Company may also generate a log of your activity, track internet and other network activity, and develop a user profile to provide those programs to you in a manner tailored to your preferences.

All benefits may not be available to all Employees, and the Company will only collect Personal Information to provide a benefit if the Employee is eligible for and enrolled in that benefit. Employees should take care to read the specific terms applicable to any particular mobile application or benefits program to understand the specific pieces of information collected.

e. Ensure the Safety of People, Facilities, and Property

Wallenius Wilhelmsen collects various categories of information to ensure the safety of people, facilities and property. Some information—such as identifiers, personal information, protected classifications, and biometric information—help verify the identity of Employees in specific facilities. Other categories of information, such as geolocation data and sensory data, may assist the Company with ensuring the security of facilities and Company vehicles.

Retention and Disposal of Personal Information

Any Personal Information collected by the Company will be retained by the Company during the period of active employment of the Employee as well as during the post-employment period only as long as the Personal Information is required to serve its original purpose or as directed by applicable legislation or regulation. Personal Information that is no longer needed for its stated purpose will be destroyed, erased, or made anonymous as long as we do not have a lawful need for it.

The Company will ensure that all practices and procedures relating to the disposal of Personal Information will respect the fundamental policy of confidentiality. All Personal Information disposal procedures, including the disposal of computerized data storage devices, will ensure the complete destruction of Personal Information so that there will be no risk of subsequent unauthorized disclosure of Personal Information.

Updates to the Privacy Policy

This Privacy Policy is subject to occasional revision, and if we make any material changes in the categories of information we collect or the reasons we collect that information, we will notify you by sending you an e-mail and/or by prominently posting notice of the changes. This Privacy Policy will also be posted to <https://careers-2wglobal.icims.com> and the Wallenius Wilhelmsen Intranet page, and you can review or consult the Privacy Policy at any time.

Contact Us With Questions

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