

Data Privacy Policy of Viking EMEA

1.		General information on the collection of personal data	2		
2.		Contact data			
	2.1	.1. Name and address of person responsible for data processing ("controller")	3		
	2.2	.2. Name and address of the data protection officer	3		
3.		Notes on legitimateness and period of storage	4		
	3.1	.1. Legitimateness of the processing of personal data	4		
	3.2	.2. Period of storage and deletion of data	4		
4.		Your rights	5		
	4.1	.1. Right of access by the data subject	5		
	4.2	.2. Right to rectification	5		
	4.3	.3. Right to restriction of the processing	5		
	4.4	.4. Right to erasure ('right to be forgotten')	5		
	4.5	.5. Right to be informed	5		
	4.6	.6. Right to data portability	5		
	4.7	.7. Right to object	6		
	4.8	.8. Right to withdraw the consent	6		
	4.9	.9. Right to lodge a complaint with a supervisory authority	6		
5.		Visits to our Viking EMEA website and creation of log files	6		
6.		Use of Viking EMEA login area	7		
	6.1	.1. Data required for the registration	7		
	6.2	.2. Data processing after registration	8		
	6.3	.3. Transmission to affiliated undertakings	8		
	6.4	.4. Legitimateness of the processing of personal data	8		
7.		Use of the training registration form	8		
	7.1	.1. Data required for the registration	8		
	7.2	.2. Transmission to affiliated undertakings	9		
	7.3	.3. Legitimateness of the processing of personal data	9		
8.		Newsletter	10		
	8.1	.1. Sending of Newsletter	10		
	8.2	.2. Disclosure to third parties	10		
9.		SurveyMonkey			
10).	Use of cookies and comparable technologies (collectively "cookies")			
	10	0.1. General information	12		
		10.1.1. Necessary cookies	12		
		10.1.2. Functional cookies	12		
		10.1.3. Statistics	13		
	10	0.2. Objection / withdrawal of consent	13		
	10	0.3. Statistics Matomo Analytics Cloud ("Matomo")	14		

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10.4	4. Functional Use of Google reCAPTCHA	14
10.5	•	
10.6		15
10.7		
11.	Presence on third-party platforms	
12.	Disclosure of data to third parties	17
12.1		
12.2	2. Disclosure of your data to affiliated undertakings of Viking EMEA	17
12.3		
12.4	4. Technical support and implementation of the website	18
13.	Security standards	18
14.	General provisions	19
14.1	1. Adaptations	19
14.2		19
14.3	3. Agreement	19

1. General information on the collection of personal data

Viking S.A., 21, Z.I. Haneboesch, L-4562 Differdange/Niederkorn, Luxembourg (in the following referred to as "Viking EMEA") attaches great importance to the protection of your personal data. This data privacy policy describes how Viking EMEA (also referred to in the following by the words "we", "us" and "our") uses and protects personal data collected at viking-emea.com ("Viking EMEA website").

Personal data are all data which refer to you personally, including for example your form of address, name, address, email address, IP address, etc. We only collect and process your personal data in compliance with the provisions of the EU General Data Protection Regulation ("GDPR") and other provisions of European and applicable national data protection law (for example, UK GDPR).

Personal data are only collected and used on a regular basis with your consent or if the processing of such data is permitted by law. The following provisions provide information about the type, scope and purpose of the collection and processing of your personal data.

In the event that we make use of the services of commissioned service providers (third parties) for the purpose of providing specific functions for our website or of our services or if we use your data for advertising or analysis purposes, we will also inform you in detail in the following about the data processing taken. We also provide information about the stipulated criteria for and the period of storage. We also inform you about your rights with regard to each data processing activity.

The Viking EMEA website contains links to other websites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites. Please note that the third party websites might install their own cookies on your device and/or collect



personal data. We have no control over this. Therefore, please make any inquiries about this directly with the providers of these linked websites.

2. Contact data

2.1. Name and address of person responsible for data processing ("controller")

Viking EMEA ("controller") is responsible for data protection within the meaning of the GDPR and under all other applicable EU data protection law. If you have any questions, suggestions or criticisms relating to data protection and our Viking EMEA website, please contact:

Viking S.A.
21, Z.I. Haneboesch
L-4562 Differdange/Niederkorn
Luxembourg
e-Mail: DataProtectionOfficer@viking-emea.com

2.2. Name and address of the data protection officer

Any data subject (anyone affected of data processing activities) can contact our data protection officer with questions and suggestions directly at any time. Our data protection officer can be contacted as follows:

Viking S.A.

Data Protection Officer

21, Z.I. Haneboesch L-4562 Differdange/Niederkorn Luxembourg

e-Mail: DataProtectionOfficer@viking-emea.com



3. Notes on legitimateness and period of storage

3.1. Legitimateness of the processing of personal data

The processing of your personal data is legitimate if **you have given your consent** as stipulated in Article 6 (1) sentence 1 a) GDPR.

Under Article 6 (1) sentence 1 b) GDPR, the processing of your personal data is legitimate if such processing is necessary for the **performance of a contract** with you or your company. This also applies to all processing operations which are relevant prior to entering into a contract.

Under Article 6 (1) sentence 1 c) GDPR, the processing of your personal data is legitimate if such processing is necessary for **compliance with** one of our **legal obligations**.

Under Article 6 (1) sentence 1 d) GDPR, the processing of your personal data is legitimate if such processing is necessary in order to **protect your vital interests** or those of another natural person.

Under Article 6 (1) sentence 1 f) GDPR, the processing of your personal data is legitimate if such processing is necessary for the purposes of the **legitimate interests** pursued by our company or by a third party, except where such legitimate interests are overridden by your interests or fundamental rights and freedoms.

3.2. Period of storage and deletion of data

Any personal data which we collect, process and store will be kept by us for as long as there is a specific purpose for such storage. Your data will be deleted or their processing restricted as soon as the specific purpose for which they were stored no longer applies.

It is possible, however, that European regulations, applicable national laws or other rules may require us to store data which we have processed for a longer period of time. We will delete or restrict the processing of your data when these (statutory) data retention periods have expired.



4. Your rights

For the purposes of the GDPR you are the **data subject** of any of your personal data which we process. As a data subject you have the following rights with regard to Viking EMEA:

4.1. Right of access by the data subject

You have the legal right to request information at any time about whether we are processing your personal data. If this is the case, you have the right to be informed about the extent to which your personal data is being processed (cf. Article 15 GDPR).

4.2. Right to rectification

You have the right to obtain from Viking EMEA the rectification of inaccurate personal data concerning you and/or to have incomplete personal data completed (cf. Article 16 GDPR).

4.3. Right to restriction of the processing

In certain circumstances you have the right to have the processing of your personal data restricted (cf. Article 18 GDPR).

4.4. Right to erasure ('right to be forgotten')

In certain circumstances you have the right to obtain from Viking EMEA the deletion of personal data concerning you without undue delay. The right to erasure does not apply if processing is necessary (cf. Article 17 GDPR).

4.5. Right to be informed

If you have asserted your right to rectification, erasure or restriction to Viking EMEA, Viking EMEA must communicate any rectification or deletion of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort (cf. Article 19 GDPR).

4.6. Right to data portability

You have the right to receive any personal data concerning you which you have provided to Viking EMEA in a structured, commonly used and machine-readable format. In certain circumstances you also have the right to transmit those data to another company without hindrance from Viking EMEA to which the personal data have been provided initially (cf. Article 20 GDPR).



4.7. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you based on Article 6 (1) sentence 1 f) GDPR (cf. Article 21 GDPR). Viking EMEA may then no longer process the personal data relating to you unless Viking EMEA demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If the personal data relating to you is processed for the purposes of engaging in direct advertising, you have the right to object at any time to the processing of your personal data for such advertising purposes. You can inform us of such objection by contacting us as follows:

Viking S.A.
21, Z.I. Haneboesch
L-4562 Differdange/Niederkorn
Luxembourg

e-Mail: <u>DataProtectionOfficer@viking-emea.com</u>

4.8. Right to withdraw the consent

You have the right to withdraw your consent at any time. The withdrawal of consent does not affect the legitimateness of processing based on consent before its withdrawal (cf. Article 7 GDPR).

4.9. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

5. Visits to our Viking EMEA website and creation of log files

Our system automatically collects data and information from your computer system every time you visit our Viking EMEA website. The following data may be then collected:

- Information about the type of browser you are using
- Information about your operating system
- Information about your internet service provider
- Your IP address
- The date and time of your visit to our website
- Information about the website from which your system has reached our website
- Information about the website which you access from our website



The data which we collect on you is stored in our system's log files. As a rule, these data are not stored with other personal data. One exception to this rule is the information collected by us about your browser settings. We check your language settings in your web browser to display the Viking EMEA website in the appropriate language.

The temporary storage of data and log files is legitimate under Article 6 (1) sentence 1 f) GDPR. We have a legitimate interest in collecting and temporarily storing the data referred to as the IP address must be stored temporarily by the system in order to provide the website to your computer. Your IP address must be stored for as long as you are surfing on our website.

Data are stored in log files to ensure the functioning of the website. This information is also used to optimise our website and to warrant the security of our information technology systems. Your log files are not assessed for marketing purposes in this connection.

The data will be erased or altered in a way that prevents them being assigned to you as soon as they cease to be necessary for the purposes referred to here. Data which are stored in log files are erased after seven days.

6. Use of Viking EMEA login area

In order to use the Viking EMEA login area, you must register online.

6.1. Data required for the registration

When you register for the login area, you must enter your user name, first and last name, phone and e-Mail address, and your company information such as company name, address, country as well as your position within the company.

You will also select a password during the registration process which you must keep secret and not divulge to third parties. Nor will Viking EMEA divulge your password to third parties.

The data mentioned above are needed to set up and manage a user account for you so that you can take full advantage of the Viking EMEA web services. We also need this information, and possibly other data, in order to react to requests, questions and criticism.

We also store the time of your most recent login.

During registration, you will also have the opportunity to provide other optional information, such as your preferred communication language, mobile phone etc. Please note that such information is not required for registration and that you alone decide whether to give us these data.

You are entirely free to communicate your personal data to us. If you choose not to do so, we might refuse certain services.



6.2. Data processing after registration

Designated Viking EMEA employees can access your data stored at Viking EMEA in order to, for example, provide you with information about products, services or technical training, or conduct surveys about your satisfaction.

In the context of the login area, Viking EMEA will use your data to evaluate your request and if applicable, assign the appropriate rights so you can benefit from additional information that is not available publicly.

6.3. Transmission to affiliated undertakings

In certain circumstances, data entered by you may be transmitted to affiliated undertakings of Viking EMEA if the thematic and regional content of your enquiry relates to the relevant affiliated undertakings. In this case also Viking EMEA remains your first point of contact and you are entitled to assert your rights against Viking EMEA.

In some circumstances, Viking EMEA may transfer the data to countries outside the European Economic Area. Viking EMEA's affiliated undertakings will, however, take the necessary steps to ensure that an appropriate level of data protection is maintained. If Viking EMEA sends your data to the United States, for example, additional measures are taken, such as concluding EU-compliant data transmission agreements with the data importer, if this is necessary.

By sending off the registration form you declare that you agree to transmission of the data entered in the registration form to undertakings affiliated with Viking EMEA if the thematic and regional content of your enquiry relates to the relevant affiliated undertakings. Further information about affiliated undertakings and their data privacy provisions is available here: https://www.viking-emea.com/contact. You are entitled to withdraw your consent by notifying Viking EMEA at any time. Withdrawal of consent does not prejudice the legitimateness of processing based on previous consent given prior to its revocation.

6.4. Legitimateness of the processing of personal data

The processing of the aforementioned data is legitimate under Article 6 (1) sentence 1 a), b) or f) GDPR. The data are erased as soon as they are no longer required for the purpose for which they have been collected and provided that they are not subject to any legal archiving obligations.

You can withdraw your consent to Viking EMEA for the processing or any other use of your personal data at any time. In this case, you can no longer use the Login-area. All personal data are then erased if they are not required to be retained by law and if no other legal grounds for processing the data exist.

7. Use of the training registration form

If you would like to participate in our trainings, you can register via our training registration form.

7.1. Data required for the registration

When you register for a training, you must enter your title, first and last name, and e-Mail address, company information as well as your position within the company. Furthermore we need the participant data and payment details. All requested participant data are mandatory. All other mandatory details are identified with an asterisk (*).



During registration, you will also have the opportunity to provide other optional information, such as your preferred communication language, mobile phone etc. Please note that such information is not required for registration and that you alone decide whether to give us these data.

The data mentioned above are needed that you can take full advantage of the Viking EMEA services as to the trainings. We also need this information, and possibly other data, in order to react to requests, questions and criticism. You are entirely free to communicate the personal data to us. If you choose not to do so, we might refuse certain services.

The following data are also stored at the time you send your request:

- Your IP address
- The date and time at which you have made contact

These additional personal data processed during the transmission operation are used to prevent the registration form from being misused and to ensure the security of our information technology systems. Those data will be erased after a period of seven days at the latest.

7.2. Transmission to affiliated undertakings

In certain circumstances, data entered by you may be transmitted to affiliated undertakings of Viking EMEA if the requested training relates to the relevant affiliated undertakings. In this case also Viking EMEA remains your first point of contact and you are entitled to assert your rights against Viking EMEA.

In some circumstances, Viking EMEA may transfer the data to countries outside the European Economic Area. Viking EMEA's affiliated undertakings will, however, take the necessary steps to ensure that an appropriate level of data protection is maintained. If Viking EMEA sends your data to the United States, for example, additional measures are taken, such as concluding EU-compliant data transmission agreements with the data importer, if this is necessary.

By sending off the registration form you declare that you agree to transmission of the data entered in the registration form to undertakings affiliated with Viking EMEA if the thematic and regional content of your enquiry relates to the relevant affiliated undertakings. Further information about affiliated undertakings and their data privacy provisions is available here: https://www.viking-emea.com/contact. You are entitled to withdraw your consent by notifying Viking EMEA at any time. Withdrawal of consent does not prejudice the legitimateness of processing based on previous consent given prior to its revocation.

7.3. Legitimateness of the processing of personal data

The processing of the aforementioned data is legitimate under Article 6 (1) sentence 1 a), b) or f) GDPR. The data are erased as soon as they are no longer required for your registration and the requested training and provided that they are not subject to any legal archiving obligations.



You can withdraw your consent to Viking EMEA for the processing or any other use of your personal data at any time. All personal data are then erased if they are not required to be retained by law and if no other legal grounds for processing the data exist.

8. Newsletter

8.1. Sending of Newsletter

You can subscribe to a free newsletter. With your consent you will receive periodic e-Mails about fire protection products, services, training and event information. The data which you enter when subscribing to the newsletter are transmitted to us.

We need your e-Mail address in order to send you the newsletter and to identify and check that you have given your consent. The other information you provide is given voluntarily.

We use the double opt-in procedure to subscribe to our newsletter. This means that, after you have subscribed, we will send an e-Mail to the e-Mail address given by you asking you to confirm that you wish to receive the newsletter. If you do not confirm your subscription within 48 hours, your information will be blocked and automatically erased after one month. After receiving your confirmation, we store your e-Mail address and other data for the purpose of sending the newsletter. This processing is legitimate under Article 6 (1) sentence 1 a) GDPR.

We also store the time of your subscription and confirmation. The purpose of this procedure is to demonstrate that you have subscribed and to clarify any possible misuse of your personal data. This processing is legitimate under Article 6 (1) sentence 1 f) GDPR.

We erase your data as soon as you or we have ended the subscription for the newsletter. You can cancel the newsletter subscription at any time by withdrawing your consent with effect for the future. There is a link in every newsletter sent to you which you can click to automatically unsubscribe. Alternatively, you can send an e-Mail to contact@viking-emea.com or a message to the controller referred to above in this Data Privacy Policy.

8.2. Disclosure to third parties

Our newsletter is either sent by Viking EMEA directly or by our service provider, Clever Elements GmbH, Prinzessinnenstr. 19-20, D-10969 Berlin, Germany ("Clever Elements"). Clever Elements stores the data entered by you for Viking EMEA for the purpose of sending the newsletter. We use the services of Clever Elements as a processor.

The services provided by the Germany-based company Clever Elements are subject to the GDPR and the stringent requirements of the processing agreement made with it. Your data are only sent to third parties by Clever Elements in compliance with the legal requirements of the GDPR.

Clever Elements can use the data of the recipients to optimize or improve its own services, such as to technically optimize mailing and for the presentation of the newsletters or for statistical purposes via reporting and tracking methods like open and click rates. Our newsletter contains a so-called tracking pixel. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analyses. This allows



a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, Clever Elements may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects. Within our Clever Elements account, we can access the campaign results (open and click rates, which links clicked, repeated clicks etc.), and can also create downloads of campaign reports. Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by Clever Elements. We use this information in order to improve the sending of our newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. In case you have consented to the data processing, this processing is legitimate under Article 6 (1) sentence 1 a) GDPR. You can withdraw your consent with effect for the future at any time.

Furthermore, it is legitimate under Article 6 (1) sentence 1 f) GDPR to pass on your data (e.g. name, e-Mail address and IP address) to Clever Elements as we use Clever Elements' software to send the newsletter and to carry out statistical analyses.

We will only process your data for as long as necessary to fulfil the purpose for which they have been collected. You will find more information about data protection at Clever Elements at: https://www.cleverelements.com/privacy.

9. SurveyMonkey

We use the services of SurveyMonkey, a web based survey platform of SurveyMonkey Europe UC, 2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland ("SurveyMonkey"). When you take part in our surveys, the technical data required for the process and the data you have entered are transferred to SurveyMonkey. In general, SurveyMonkey uses cookies on your computer to prevent multiple participation and to customize the survey software to create anonymous user profiles. Via a setting in the survey, multiple participation might be allowed in case a device is used/shared by several persons.

SurveyMonkey stores data on SurveyMonkey Inc.'s server in the USA. SurveyMonkey ensures that the recipient of your personal data offers an adequate level of protection, for instance by entering into the appropriate back-to-back agreements. The Data Processing Agreement with standard contractual clauses for the transfer of data as approved by the European Commission is in force between SurveyMonkey and Viking.

We will be asking for participation consent at the beginning of each survey. If consent is not given, you are "disqualified" and you will not see the survey at all. In case you have consented to the data processing, this processing is legitimate under Article 6 (1) sentence 1 a) GDPR. You can withdraw your consent with effect for the future at any time. In addition, we use SurveyMonkey for the collection and storage of personal data for contract processing on the basis of Article 6 (1) sentence 1 b) GDPR. In all other cases, we use SurveyMonkey in accordance with Article 6 (1) sentence 1 f) GDPR. Our legitimate interest is to carry out a representative online survey e.g. concerning customer satisfaction or product improvement. We will only process your data for as long as necessary to fulfil the purpose for which they have been collected.

You can disable cookies or manage your cookie settings in the browser which you are using (please refer to the cookie section of this Data Privacy Policy).



For more information, please see SurveyMonkey's privacy policy: https://www.surveymonkey.com/mp/legal/privacy-policy/ and SurveyMonkey's Cookie Policy: https://www.surveymonkey.com/mp/legal/cookies/

10. Use of cookies and comparable technologies (collectively "cookies")

10.1. General information

Whenever you use our Viking EMEA website different types of cookies are used and stored on your computer in addition to the data referred to above. Cookies are small text files which are stored on your computer or mobile device whenever you visit our Viking EMEA website. These cookies send us various types of information.

We are using cookies to make your browsing experience better, and to enable you to make the best possible use of our website.

When you visit our website we ask for your consent to permit us to set cookies. We use the data collected by cookies for as long as required for the purpose for which they have been collected.

10.1.1. Necessary cookies

Some cookies are technically necessary to make the basic functions of the website available to you, and, therefore, they cannot be deactivated.

You will find a list of the cookies we actually use here:

Cookie	Function	Period of cookie storage
cookieconsent	Stores the setting for whether the user has agreed to	1 year
	the use of cookies or not.	
region_code	Stores the region and language selected by the user	1 month
sessionID	A sessionID is a unique number that a website's server	6 days
	assigns a specific user for the duration of that user's	
	visit (session). Remembers that a user is logged in and	
	keeps a user logged in for a defined period of time.	

You are in control of your data

Cookies necessary for operating the website are set. For all others, you decide for yourself which cookies you want to allow by making choices via the cookie preferences (Consent Management Platform).

10.1.2. Functional cookies

We occasionally offer services from other companies (third parties), such as YouTube or Flowplayer for the display of videos. If these cookies are disabled, this content cannot be displayed.

You do not have to choose those cookies. However, note that if you disable cookies and similar technologies entirely, the website may not function properly and/or the website will be less convenient to use.



10.1.3. Statistics

Statistic cookies help us to understand how you as a website visitor interact with the website, by collecting and reporting information anonymously.

These cookies may track things such as how long you spend on a site, which pages you visit or which documents you click or download, so we can continue to produce engaging content for you.

You do not have to choose those cookies.

10.2. Objection / withdrawal of consent

Cookies will be stored on your computer. You can decide whether you want to erase the cookies from your computer at any time. You can change the settings in your browser to determine yourself whether the transmission of cookies from your computer to us should be disabled, restricted or whether the cookies should be completely erased. If you disable all the cookies from our website, you may no longer be able to use all the website functions in full.

The following list provides further information about disabling cookies or managing your cookie settings in the browser which you are using:

- Safari: http://help.apple.com/safari/mac/8.0/#/sfri11471
- iPhone, iPad or iPod: https://support.apple.com/en-gb/HT201265
- Google Chrome: https://support.google.com/chrome/answer/95647?hl=en
- Internet Explorer / Edge: http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies
- Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
- Firefox Android: https://support.mozilla.org/en-US/kb/block-cookies-firefox-focus-android

You can also change your cookie settings directly on our website. If you have given consent to cookies and similar technologies, you can withdraw it at any time on our Consent Management Platform (CMP). The CMP is available in the footer of the Viking EMEA website: select "Cookie preferences", then remove the checkmark in question and click the button "Confirm selection" in order to change your settings.



10.3. Statistics | Matomo Analytics Cloud ("Matomo")

As mentioned above, statistic cookies help us to understand how you as a website visitor interact with the website, by collecting and reporting information anonymously.

These cookies may track things such as how long you spend on a site, which pages you visit or which documents you click or download, so we can continue to produce engaging content for you.

Our Viking EMEA website uses Matomo Analytics Cloud ("Matomo"), a web analytics service of Innocraft Ltd. Innocraft is based in 7 Waterloo Quay PO625, 6140 Wellington, New Zealand. Matomo makes use of cookies and finger printing technologies. Matomo data is hosted in Germany, i.e. the information about the way you use our website created by the cookie is sent to and stored on a Matomo server in Germany, but data is owned and processed by Viking. The Viking EMEA website uses IP address anonymization. As such, your IP address is an anonymous and truncated code for us. We have no technical means of identifying you as a registered user.

The legal basis for data processing is your explicit consent according to Article 6 (1) sentence 1 a) GDPR.

You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website.

10.4. Functional | Google reCAPTCHA

Viking EMEA uses the reCAPTCHA service of Google Inc. ("Google") to protect the enquiry data you enter in the registration form. Google can be reached at Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. The purpose of the test is to predict whether data are being entered by a human or abusively by a processing robot. The test includes sending to Google the IP address and any other data required by Google for the reCAPTCHA service. The data you enter are therefore sent to Google which may then make further use of them. However, the IP anonymization activated by Viking EMEA on this website means that Google will first truncate your IP address in Member States of the European Union or in other state parties to the Agreement on the European Economic Area. Standard contractual clauses (SCCs) in accordance with Article 46 GDPR have been concluded as appropriate safeguards. More information regarding SCCs can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection en.

Only in exceptional cases is the full IP address sent to and truncated on a Google server in the USA. Google will only use such information on behalf of Viking EMEA to evaluate your use of this service. The IP address sent by your browser by reCAPTCHA is not combined with other data held by Google.

The use of reCAPTCHA is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. We use reCAPTCHA to prevent our website being misused. We



will only process your data for as long as is necessary to fulfil the purpose for which they have been collected (in this case preventing misuse of our website).

More information about Google's privacy policy is available at: https://policies.google.com/privacy?hl=en.

10.5. Functional | OpenStreetMaps

This website uses OpenStreetMas, a map service from OpenStreetMap Foundation ("OSMF"). OSMF can be reached at OpenStreetMap Foundation ("OSMF"), St. John's Innovation Centre, Cowley Road, Cambridge, CB4 OWS, United Kingdom (openstreetmap.org/about). This service enables us to display a map directly on our website and makes it easy for you to identify the Viking EMEA locations on a map.

When you visit a page on the Viking EMEA website on which the map service is offered, OSMF may collect information about your browser or application and your interaction with the OSMF website, including:

- (a) IP address,
- (b) browser and device type,
- (c) operating system,
- (d) referring web page,
- (e) the date and time of page visits, and
- (f) the pages accessed on their websites.

The map data is available under the Open Database License. More info: www.openstreetmap.org/copyright

The use of OpenStreetMap is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. If you do so, you will no longer be able to see the map.

10.6. Functional | YouTube

We use integrated contents (videos) on our website provided by www.youtube.com ("YouTube"), which is operated by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

We use YouTube videos in privacy-enhanced mode. YouTube describes how it works as follows: "Privacy Enhanced Mode allows you to embed YouTube videos without using cookies that track viewing behavior. This means no activity is collected to personalize the viewing experience. Instead, video recommendations are contextual and related to the current video. Videos playing in Privacy Enhanced Mode won't influence the viewer's browsing experience on YouTube." Cookies are there-fore placed by YouTube only if you actively enable playing of an embedded video. You can find more information on the subject at: https://support.google.com/youtube/answer/171780?hl=en#zippy=%2Cturnon-privacy-enhanced-mode

This means that YouTube will not store any information about the user on the website until he or she views the YouTube video. When you watch such video, a connection is made to YouTube's webservers. In this way information about which of our web pages you have visited is passed on to the YouTube server. If you are logged in as a YouTube



member, YouTube will associate this information with your personal YouTube account. You can prevent this association being made by logging out of your YouTube account before visiting our website.

Google also processes your personal data in the USA and bases that on the standard contractual clauses of the European Commission; you can find more information on this subject at: https://policies.google.com/privacy/frameworks?hl=en

The use of YouTube is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. If you do so, you will no longer be able to see video contents provided by YouTube on the Viking EMEA website.

YouTube's data privacy policy is available at https://policies.google.com/privacy?hl=en.

10.7. Functional | FlowPlayer

We use an embedded video player called "FlowPlayer" to show you video contents on our Viking EMEA website. FlowPlayer is a service provided by Flowplayer AB, Regeringsgatan 29, 5th Floor, 111 53 Stockholm, Sweden.

Flowplayer collects your IP address for geoblock validation and determination of country of origin as well as DOS and abuse protection.

The use of FlowPlayer is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. If you do so, you will no longer be able to see video contents on the Viking EMEA website.

11. Presence on third-party platforms

Viking EMEA runs presences on third-party platforms whose operators process and store data of their users. Viking EMEA does not have any influence on their data privacy regulations and settings. We explicitly point out that the third-party platforms also use cookies with which they can track usage behavior on other websites and apps of the group and on specific websites and in specific apps that integrate the technologies of the third-party platform in question. Information on the data collected and how they are used, the purposes for which they are stored, and how to request erasure of or information on them can be found in the privacy policy of the respective platform.

LinkedIn:

https://privacy.linkedin.com/

YouTube:

https://policies.google.com/privacy?hl=en



12. Disclosure of data to third parties

12.1. Basic principles

As a rule, we will only pass on your personal data in compliance with the applicable data protection laws to service providers, business partners, affiliated undertakings and other third parties.

We may disclose personal data to service providers working on our behalf and require them to perform services in our name (data processing agreement). These service providers may be affiliated undertakings of Viking EMEA or external service providers. In this context we comply with stringent national and European data protection regulations. These service providers are bound by our instructions and are subject to stringent contractual limitations on the processing of personal data. Accordingly, data may only be processed if this is necessary for the performance of services in our name or in order to comply with legal requirements. We stipulate precisely and in advance the rights and obligations of our service providers in relation to personal data.

We may disclose personal data to a third party if we are required to do so by law or in legal proceedings or in order to supply and manage our products and services. We may also be required to provide information to law enforcement agencies or other public authorities. We are also authorized to release data if the disclosure of information is necessary for the purposes of collaboration and thus of providing Viking EMEA services to you or if you declare your consent to such disclosure. Disclosure can also rarely be avoided in the course of tax audits.

12.2. Disclosure of your data to affiliated undertakings of Viking EMEA

Your data may also be disclosed to Viking EMEA affiliated undertakings for the purpose of processing the contact you have had with the company. A list of relevant Viking EMEA affiliated undertakings can be found here: https://www.viking-emea.com/contact.

All Viking EMEA affiliated undertakings are required by Viking EMEA to comply with GDPR data protection provisions and other European data protection standards (order processing).

Your data are only disclosed if you have given your consent. The use of data is legitimate under Article 6 (1) sentence 1 a) GDPR provided that you have given your consent.

You may withdraw your consent from Viking EMEA at any time. Withdrawal of your consent only has effect for the future.

Your data are erased if they are no longer required to achieve the specific purpose.

12.3. Webhosting

Our website and thus your data are hosted by Amazon Web Services EMEA SARL, 38, avenue John F. Kennedy, 1855 Luxembourg (in the following referred to as "Amazon"). Amazon may only use the data in accordance with our instructions (data processing agreement). Amazon also adopts stringent technical measures to protect your personal data. Amazon does not pass on your personal data to third parties unless this is necessary in order to perform the agreed services or if Amazon is required to do so by law or to comply with a valid and mandatory instruction issued by a government or regulatory authority. The data provided for this purpose is kept to a minimum.



In some circumstances, Amazon may also store the information in countries outside the European Economic Area. Amazon will, however, take the necessary steps to ensure that an appropriate level of data protection is maintained. If Amazon sends your data to the United States, for example, additional measures are taken, such as concluding EU-compliant data transmission agreements with the data importer if this is necessary.

The EU Standard Contractual Clauses will apply to customer data that is transferred outside the EEA, either directly or via onward transfer, to any country not recognized by the European Commission as providing an adequate level of protection for personal data (as described in the GDPR).

The processing of your data is legitimate under Article 6 (1) sentence 1 f) GDPR. The purpose of processing data is that Amazon enables us to use Amazon servers. We only store the data for as long as is necessary to achieve this purpose.

More information from Amazon about data protection is available at: https://aws.amazon.com/compliance/gdpr-center/.

12.4. Technical support and implementation of the website

Technical support and website implementation is provided in cooperation with the external partner Kreios S.à.r.l. ("Kreios"). Kreios is based at Rue du Cimetière 23, 5214 Sandweiler, Luxembourg. Kreios may only use the data in accordance with our instructions (data processing agreement). In this context we comply with stringent national and European data protection regulations. Kreios is bound by our instructions and is subject to stringent contractual limitations on the processing of personal data. Accordingly, data may only be processed if this is necessary for the performance of services in our name or in order to comply with legal requirements. We stipulate precisely and in advance the rights and obligations of Kreios in relation to personal data. Kreios also adopts stringent technical measures to protect your personal data. Kreios does not pass on your personal data to third parties unless this is necessary in order to perform the agreed services or if Kreios is required to do so by law or to comply with a valid and mandatory instruction issued by a government or regulatory authority. The data provided for this purpose is kept to a minimum.

The processing of your data is legitimate under Article 6 (1) sentence 1 f) GDPR. The purpose of data processing is, that Kreios will have the opportunity to implement and maintain our website on an ongoing basis. We store your data for as long as is necessary to achieve this purpose.

More data protection information is available from our partner at: http://kreios.lu

13. Security standards

Viking EMEA has implemented appropriate physical, technical and administrative security standards to protect personal data against loss, misuse, modification or destruction. Our service providers and associated undertakings are contractually committed to safeguarding the confidentiality of personal data. They are also prohibited from using data for purposes not approved by us.



14. General provisions

14.1. Adaptations

If this policy would be amended, the amended version will be made available on our website and will be applicable from your first visit following this modification. The continued use of our website following the posting of changes to this Privacy Policy will be deemed as an acceptance of these changes.

14.2. Applicable law

This policy shall be governed interpreted and executed in accordance with Luxembourgish law, to the extent permitted by law.

14.3. Agreement

By using this website, you accept all its provisions and you agree that we collect and process your personal data in accordance with this policy.

We may update this Data Privacy Policy from time to time. We therefore recommend that you regularly read this Data Privacy Policy to ensure that you are familiar with our data protection practice. This Data Privacy Policy has been last updated on 27-April-2021.