



How PatoGen handles personal information

PatoGen will store our customer's contact information with the intent to administrate our business relationship. In this document you will find information on how we collect, treat and store this information in our customer database.

What kind of personal information is collected?

Name, business address, position, and contact information to employees of customers or other business connections are examples of information collected in connection to PatoGen's normal activity. If this kind of information is available, it is contact information connected to the business that are registered. Other information that are relevant for our business practice can be collected through direct collaboration with PatoGen's personnel.

PatoGen shall not ask for personal data that are not relevant for the products we offer.

For PatoGen's present and former employees date of birth, social security number and other information identifying a person is registered.

What is the purpose of collecting this personal information?

PatoGen bases a lot of its dialogue with customers on using electronic tools. In order to carry out PatoGen's activity it is necessary to identify employees of existent and new customer company's by name, email and phone number. By using this information, PatoGen can efficiently communicate with the customer.

The information that is collected can, among other things, be used to:

- Communicate regarding orders and results and offer advice on challenges
- Reply to inquiries related to our products and services
- Seek understanding and knowledge about your business as a part of our sales and marketing activities
- Gather feedback with the purpose of revising our products and services to make sure they comply with the purpose
- Conduct business and market research
- Identify speakers and/or invite to attend conferences where we are hosting
- Treat and give feedback on complaints to our products or services
- Follow legal or regulatory commitments that apply to our business

In relation to present and former employees of PatoGen, the company needs detailed information, such as birthday and social security number to be able to handle salaries, pensions, insurance, and in dialogue with for example NAV.

Legal basis

In the GDPR's paragraph 6 there are specified different legal authority the companies can have to gather and use personal information. Explicit consent, a user contract, statutory requirements for the company and safeguarding of legitimate interest are examples of legal basis.

What is the source for the data with personal information?

Personal data comes to PatoGen in several ways. This can be business cards and inquiries via email that is registered in the company's database for contacts, to administrators with customer's that set up users of PatoGen's portal for reporting of analysis results and other information. PatoGen do not buy user data from external sources.

With own employees, personal data are obtained via employment contracts.

Follow-up of privacy in PatoGen

Handling of privacy is placed within the quality area for handling and control. A part of this follow-up is the division of personal data as confidential, anonymous, sensitive etc.

In practice, the classification is done through a table set up that states in which category the information belongs, who has access to the information and background for why the information is collected and intended used. Deviations in relation to the rules will be registered and followed up as a part of PatoGen's system for quality and deviation handling.

Who can get access to the personal data?

Access to personal data shall be means-tested. Who has access to the data is regulated in a table that is part of PatoGen's quality system. Staff in charge of salaries can get access to personal information in the salary system, HR staff can get access to personal information, staff in the sales team can get access to customer information etc.

The personal information is not transferred to other countries. Data with personal information shall in principle be held inside of the EU. In other cases, PatoGen shall document if the data is transferred and for what purpose.

What kind of system is used to store the information?

Customer information is handled in PatoGen's CRM system.

PatoGen uses several systems on own servers and in cloud to store personal information. Salary, pension and insurance is handled by external subcontractors. All of these have implemented their own GDPR based agreements with PatoGen. Contracts of employment, documentation in connection to sick leave etc. is stored in a limited area on PatoGen's internal servers.

Information, attachments etc. can be communicated through the company's email. This content is stored in the company's email service.

How long is personal data stored?

PatoGen's practice is to store personal data as long as they are relevant for the current business purpose. On a regular basis the company databases should be reviewed with the goal that these shall be updated.

The information on the employee's salaries shall be stored for as long as the accounting law and archive law demands and give permission to.

Is personal data shared with a third party, and why?

PatoGen does not share customer's personal information with other parties. In connection with work on PatoGen's systems external partners can technically get access to personal data, third parties like this will always have signed an agreement that secures that the information is protected.

Personal information connected to previous or present employees are shared with the company's subcontractors that perform payment of salaries and handles insurance and pensions. Data processing agreements have been established with the relevant subcontractors.

How is the information secured?

The General Data Protection Regulation article 5, number 1, letter f, says that personal information shall be secured. Securing personal information should be done in relation to risk. That means that PatoGen makes risk assessments as an element in our internal control system. PatoGen takes reasonable physical and electronic precautions to protect the information we store.

In general, the information is secured by access control, protected by usernames and passwords for digital access. For physical access data is secured either through an access control system to server room or cloud subcontractors security solutions (typically approved by international standards like ISO 27001, HIPAA, FedRAMP, SOC 1 and SOC 2).

PatoGen shall base its work on information security on ISO 27001:2017.

Your privacy rights and choices

In active customer relationship it is agreed that customer related data can be used in a responsible manner.

Upon request, PatoGen shall provide information on how your personal information is used. You also have the right to see which information that is stored and ask for a correction or deletion of data.

Has the person been informed that you have information about her or him?

This is described in customer agreements and in this privacy policy.

How you can contact us

PatoGen can be contacted by phone, (+47) 70 11 69 00, by email, post@patogen.no, or pr mail to:

PatoGen AS
Postboks 548
6001 Ålesund
Norway

If you believe that your personal information is not being treated correctly, and you are not satisfied with the feedback from PatoGen, you can submit a complaint to the Norwegian Data Protection Authority.