



# Data Protection Policy

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Ölgerðin Egill Skallagrímsson hf. and its subsidiaries, including Danól ehf., have dedicated themselves to ensuring the reliability, confidentiality, and security of the personal information processed by the Group.

This Data Protection Policy covers personal information concerning individuals who do business with or contact Ölgerðin and/or Danól, contacts who act on behalf of legal entities in business with the companies, contacts of suppliers, supervisory authorities and other parties who are in contact with the companies, contractors and those individuals who visit the companies' establishments (hereafter collectively referred to as "you.")

This Data Protection Policy aims to inform you of what type of personal data is collected by the companies, for what purpose, and how the companies use such data.

In those cases when you have a contract relationship or communication with Ölgerðin, Ölgerðin acts as a so-called controller within the meaning of the Data Protection Act. In those cases when you have a contract relationship or communication with Danól, Ölgerðin and Danól appear as so-called joint controllers, since Danól outsources a large part of its activities to Ölgerðin. In this policy, for the sake of simplicity reference is often only made to "**Ölgerðin**" or the "**Company**," even if the processing is also related to Danól, as appropriate.

If you are in doubt as to how this policy applies to you, please contact Ölgerðin's Data Protection Officer (DPO) for more information. The contact information of Ölgerðin's DPO can be found at the end of the policy.

## 1. Purpose

Ölgerðin seeks to fulfil data protection legislation in all respects. This Data Protection Policy is based on Act no. 90/2018 on the Protection of Personal Privacy and Processing of Personal Data ("**Data Protection Act**.")

Personal data under this Policy means any personally identified or personally identifiable information, i.e. information that can be traced directly or indirectly back to a particular individual. Data that are not personally identifiable are not deemed to be personal data.

## 2. Personal information that Ölgerðin processes

### 2.1 Customers of the Company

We collect and store a variety of personal information about our customers. Various types of personal data on you may be collected depending on whether you are a customer of the company yourself or whether you represent a legal person transacting business with the Company.

The following is the information that Ölgerðin processes about individuals who do business with the Company:

- communications information, i.e. name, telephone number, and email address;
- ID no.;
- information on credit rating;
- information from communication;
- account information;
- business agreements; and
- **information for collection measures.**

The following is the information that Ölgerðin processes about individuals who act on behalf of legal entities in business with the Company:

- communications information, i.e. name, telephone number, and email address;
- email address for service survey;
- communications history;
- information on suretyship; and
- information on credit rating of executives authorised to sign on behalf of the company;

As well as the above, Ölgerðin may also collect and use other types of information provided by customers or representatives/customer contact persons and information needed by the Company for its operations. The information is processed primarily to be able to fulfill contracts with the Company's customers, but also on the basis of our legitimate interests in ensuring that the Company's customers receive good service, e.g. by investigating complaints and conducting service surveys.

The Company also reserves the right to send newsletters and targeted mail to customers and customer representatives. Such processing is based on Ölgerðin's legitimate interests, and the recipient always has the right to object to such processing and unsubscribe from mailing lists.

As a general principle, Ölgerðin collects personal information directly from the customer or their representative. **Information can, however, also come from third parties, such as Credit Info in cases**

where a person wishes to have a customer account with the Company. If personal data is obtained from a third party in other instances, the Company will endeavour to inform customers of such action.

Information about customers and suppliers and customer representatives/contacts is preserved for 4 years from the end of the business relationship. In the case of information subject to accounting legislation, the information is kept for 7 years from the end of the relevant fiscal year. Information related to customer complaints may need to be kept longer, e.g. if the complaint indicates the occurrence of loss of health.

## 2.2 *Individuals who contact Ölgerðin*

Ölgerðin receives various inquiries and suggestions from consumers, e.g. by email and through the company's social media, which contain personal information. If you send a request, suggestion or inquiry to the Company, we have a legitimate interest in preserving your contact information, e.g. name, phone number, and email address to follow up on your message and, as the case may be, repair loss or defects in a product.

Information received by the Company from consumers is not stored by the Company for longer than 4 years from the time the message is received, unless the message indicates that health damage has occurred, in which case there is reason for longer storage.

The Company's website, [www.olgerdin.is](http://www.olgerdin.is), uses cookies. Further information on the processing of personal information related to the use of such cookies can be found in the cookie notice that appears on the Company's website. By clicking on the gear icon that appears on the left side at the bottom of the Company's website, you can always visit the settings and obtain information about the cookies used on the site.

## 2.3 *Supplier contacts, supervisory authorities, and others*

The processing of personal information about supplier contacts may be necessary to fulfill the Company's contract with the relevant supplier, but the Company also has a legitimate interest in such processing for the purpose of simplifying communication and improving co-operation with suppliers.

The information in question is as follows:

- communications information, i.e. name, telephone number, and email address;
- job titles; and
- information from communication.

As well as the above, Ölgerðin may also collect and process other types of information provided by contact persons. The information generally comes directly from the contact person, but it may also come from other managers or employees of the supplier concerned.

In relation to other contacts, including contacts of regulatory authorities, e.g. customs authorities, and auditors, Ölgerðin works with contact information and job title. If communication takes place via email, such communication history is also processed. This processing is carried out on the basis of legitimate interests and depending on the circumstances or legal obligation in the case of a supervisory authority.

Information on contact persons is deleted or changed when the Company becomes aware that changes have been made to contact information. Information related to supplier contacts is not retained for longer than 4 years from the end of the contractual relationship between the Company and the relevant supplier, unless it is information that falls within the scope of the accounting and customs laws, in which case there is a 7-year retention obligation.

#### *2.4 Contractors*

Ölgerðin collects personal information about contractors who work for the Company, but the processing of the information may depend on the nature of the projects that the person carries out for the Company.

The following is the information that Ölgerðin may collect about you as a contractor, so that the Company can fulfill its obligations based on the contractor agreement:

- communications information, i.e. name, ID No., telephone number, and email address;
- information on education, training, and experience; and
- account information.

In addition to the aforementioned information, Ölgerðin may also collect and process other information that the contractors provide to the Company, as well as information that is necessary for the Company due to its activities, e.g. information from security systems in Ölgerðin's premises.

If you work for the Company as an influencer, the Company also processes personal information from your social media and performs performance evaluations following a campaign based on the Company's legitimate interests.

The information primarily comes directly from you, but it may also come from third parties, e.g. from consulting firms that analyse the effectiveness of social media campaigns. The Company may also

share personal information with similar consulting companies for the purpose of analysing the success of the partnership.

Information about contractors is not kept for longer than 4 years from the end of the project or contract, unless it is information that falls under the Accounting Act, but such information is kept for 7 years from the end of the relevant fiscal year. If the Company chooses to retain information longer about contractors who have worked for the Company, consent is requested for that retention.

## 2.5 *Contractors*

When individuals visit Ölgerðin's establishment, they must register in the Company's visitor registration system. The name of the person concerned is processed as well as information about the employee of the Company that the persons concerned plan to meet. Entering information about telephone number and email address is optional. Ölgerðin processes this information on the basis of its legitimate interests, on the one hand for organisational purposes, and on the other hand for security and asset protection purposes in case of deviations or incidents that need to be dealt with.

## **3. Electronic surveillance in Ölgerðin's premises**

For security and asset protection purposes and on the basis of the legitimate interests of Ölgerðin, and depending on the circumstances of the Company's staff, camera surveillance is used in and around the Company's premises. The appropriate signs have been installed to give notification of the use of security cameras.

If you, e.g. as a contractor, have access to access-controlled spaces in the Company's premises, information about your travels around the premises may also be collected for security and asset management purposes.

Information collected through electronic surveillance is not kept for longer than 30 days, unless such retention is necessary to make or limit a claim.

## **4. Marketing and events organised by Ölgerðin**

Ölgerðin organises various events as well as being involved in events held by third parties. The Company reserves the right to take photos at such events and use them for marketing purposes. Such processing is carried out on the basis of the company's legitimate interests.

## **5. Disclosure of information to third parties**

Ölgerðin uses various consultants and service providers in its operations. Most of these parties' act as so-called processor on the part of the Company, if it is necessary to share personal information with

such parties. Examples of this are service providers who provide the company with IT services and host the Company's systems, service providers who assist the Company in connection with service surveys, targeted emails, etc. In other cases, consultants act as independent controllers and it may be necessary for the Company to share limited personal information with such parties, e.g. the Company's lawyers and accountants. **In connection with billing, the specified sharing of personal information also takes place to entities that provide billing services to the Company, and Ölgerðin is then more often than not a so-called joint controller with that entity in connection with the processing that takes place in connection with billing.**

In those cases where the transport of goods to a customer is agreed upon, Ölgerðin must in some cases communicate limited information to the carrier.

In connection with the possible sale of the Company, in whole or in part, it may be necessary for the Company to communicate limited personal information to potential investors or their advisors. Such sharing based on the Company's legitimate interests.

Your personal information may also be provided to third parties to the extent permitted or required by applicable laws or regulations, e.g. to the Directorate of Customs and the Directorate of Internal Revenue due to their role in monitoring alcohol production and importation.

Finally, your personal information may be provided to third parties to the extent permitted or required by applicable laws or regulations or to respond to legitimate actions such as searches of premises, summons, or court rulings.

## **6. Security of the personal information processed**

Ölgerðin seeks to take the appropriate technological and organisational measures to protect personal information that the Company processes, taking specific account of their nature. These measures are intended to protect personal data against unlawful destruction, against accidental loss or alteration, and against unauthorised access, copying, use, or disclosure. Examples of security measures taken by Ölgerðin are access controls in the Company's systems, access controls in the company's premises, staff's duty of confidentiality, etc.

## **7. Amending and correcting personal data**

It is important that the personal data that Ölgerðin processes is both correct and appropriate. It is therefore important that you notify the Company of any changes that may occur to your personal information.

You have the right to have your unreliable personal information corrected. Taking into account the purpose of personal data processing, you also have the right to have incomplete personal data about you completed, including by providing additional information.

Please direct all updates to Ölgerðin's Data Protection Officer (DPO.)

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

You have the right to a confirmation regarding whether or not we process personal information about you, and if so, you can request access to the information and how the processing is conducted. You may also have the right to receive a copy of the information. Under certain circumstances, you can ask the Company to send information that you yourself have provided to us or that you have provided directly to a third party.

In certain circumstances, you can request that personal information about you be deleted without delay, for example when the retention of the information is no longer necessary based on the purpose of the processing or because you have withdrawn your consent to the processing of the personal information and there is no other basis for it.

If you do not want to have your information deleted, e.g. because you need it to defend against a claim but still want it to not be further processed by the Company, you can request that its processing be limited.

If the processing of your personal information is based on the Company's legitimate interests, you also have the right to object to that processing.

Your above rights, however, are not unequivocal. Thus, the law may oblige the Company to refuse a request for deletion or access to data. The Company can also reject your request due to the Company's rights, e.g. on the basis of intellectual property rights, or the rights of other parties, e.g. to privacy, if the Company considers those rights to be more important.

If a situation arises where the Company is unable to grant your request, the Company will endeavour to explain why the request has been rejected, however with regard to limitations based on legal obligations.

## **9. Enquiries and complaints to the Data Protection Authority**

If you wish to take advantage of the rights described in Article 13, or if you have any questions regarding this Data Protection Policy or the manner in which the Company processes your personal information, please contact the Ölgerðin's DPO.

If you are dissatisfied with the Company's processing of your personal information, you can send a complaint to the Icelandic Data Protection Authority ([www.personuvernd.is](http://www.personuvernd.is).)

## **10. Contact information**

We have appointed Ölgerðin's DPO to supervise the follow-up of this Data Protection Policy. The DPO can be contacted by sending an email to *[personuvernd@olgerdin.is]*.

The Company's contact information:

Ölgerðin Egill Skallagríms hf.

Grjótháls 7-11

110 Reykjavík

## **11. Revision**

Ölgerðin may, from time to time, amend this Data Protection Policy in line with changes to the relevant legislation and regulations or in light of changes to how we handle personal data.

All changes that may be made to the Policy shall enter into effect once the updated version has been published on the Company's website.