

PRIVACY POLICY FOR COMROD COMMUNICATION AS

1. INTRODUCTION

Comrod Communication AS, with organization number 990 295 697 and business address at Fiskaavegen 1, 4120 Tau, Norway ("**Comrod**"), and its affiliates listed in section 11 (Together "**Group**") collects and process personal data. Each Comrod company, represented by their respective CEO, is regarded a "Controller" in terms of its processing of personal data and thus responsible for processing personal data in accordance with this policy and applicable data protection law.

This privacy policy gives you information about how and what personal data we process, how we process your personal data, our legal bases for the processing, to whom the data is disclosed and what rights you have.

This privacy policy is updated when required, and the latest version is published here.

This privacy policy was updated on 14. January 2025.

2. WHOSE PERSONAL DATA DOES GROUP PROCESS?

The Group receives, collects, stores, and otherwise processes personal data of customers, potential customers, and other users of our services, including our website and social media services (collectively "**Data Subjects**").

3. WHAT PERSONAL DATA DOES THE GROUP PROCESS?

Personal data means any information relating to an identified or identifiable natural person, cf. GDPR Article 4 (1).

The Group processes

- First and surname;
- Phone number;
- Email address;
- Messages; and
- Electronic identification and behaviour data, such as your cookie data, browser information, internet service provider, hardware and software type, IP address, your unit's unique ID, browser history, and location data.

Our cookie policy is described further in section 9.

Personal data processed by Group is mainly collected directly from the Data Subjects, through their utilization of our website.

We do not collect or process sensitive personal data (special categories of personal data, cf. GDPR Article 9).

4. **WHAT DOES THE GROUP USE THE PERSONAL DATA FOR?**

We process the personal data of Data Subjects to offer products and services and to maintain our relationship with our customers. In this context, personal data may be processed for the following purposes, sorted after the underlying legal basis:

Consent, cf. Article 6 (1) a):

- To place cookies on your device, both from the Group and relevant third parties.
- Provision of information and materials related to our products and services, for example by newsletters and direct marketing.
- Identifying potential customers who are using our services for the purposes of targeting relevant marketing to such persons.
- Registrations for our events and webinars.
- Market and customer analysis and surveys.
- Contacting the Data Subject and to provide information on the services.

When it is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract, cf. Article 6 (1) b):

- Registration and delivery of our products.
- Subscription and providing of our services.
- Product and service development.
- Invoicing, recalls, warranties, customer service, feedback, and related communications.
- Management and administration of our relationship with our customers, including information purposes.

When it is necessary for compliance with a legal obligation to which we are subject (such as corporate and accounting) and/or otherwise within our legitimate interests, cf. Article 6 (1) c) and f):

- Complying and fulfilling our legal duties and obligations such as tax law, accounting, and product liability related obligations.
- Ensuring security of our products and services and preventing abuses.
- Ensuring security of our IT environments and protection of data.
- Presenting legal claims and/or responding to and defending against legal claims.

5. **WHO DOES THE GROUP SHARE THE PERSONAL DATA WITH?**

For the purposes stated in this Privacy policy, personal data is disclosed, when necessary, to authorities, and accessed by our third-party service providers and contractors (such as our IT vendors, security service providers, resellers, and service companies and marketing agencies conducting marketing on our behalf etc.). In such case, the personal data will only be disclosed for purposes, and based on the legal bases defined above. We do not sell or otherwise disclose personal data to third parties for such third parties' own purposes.

We use data processors that assist us in different processes. List of the processors and other recipients can be provided upon request.

In addition, we may share the personal data in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business and in connection with other similar arrangements.

6. DOES THE GROUP TRANSFER PERSONAL DATA TO COUNTRIES OUTSIDE THE EU/EEA?

Personal data may be transferred outside the EU or the EEA to our service providers or affiliates. In case personal data is transferred outside EU/EEA, the transfers are either made to a country that is deemed to provide a sufficient level of privacy protection by the European Commission or by using a valid transfer basis such as the EU Standard Contractual Clauses. We will implement appropriate safeguards to ensure that the personal data has the same level of protection as in the EU/EEA.

7. HOW LONG DOES THE GROUP STORE THE PERSONAL DATA?

Personal data collected in connection with our services shall be retained as long as necessary for the purposes defined in this privacy policy, cf. section 4, unless the personal data is replaced through regular updates or for any other reason.

Personal data may be, in whole or partly, retained for longer or shorter period if required by applicable law (such as for accounting, tax law and product liability related obligations) or if there is some other justified reason for us to retain or delete the personal data. In such a case, once the reason to retain the personal data ceases to exist, the Data Subject's personal data shall be erased without delay.

We evaluate the necessity and accuracy of the personal data on a regular basis and strive to ensure that the incorrect or unnecessary personal data is corrected or deleted.

8. HOW DOES THE GROUP PROTECT THE PERSONAL DATA?

Securing the integrity and confidentiality of personal data is important to the Group. We have taken adequate technical and organizational measures in order to keep personal data safe and to secure it against unauthorized access, loss, misuse or alteration by third parties, such as by encryption, access controls and firewalls.

Nevertheless, considering the cyber threats in modern day online environment, we cannot fully guarantee that our security measures will prevent illegally and maliciously operating third parties from obtaining access to personal data, or fully guarantee absolute security of personal data during its transmission or storage on our systems.

In case of any data breaches, we will notify the Data Protection Authority and the affected Data Subjects to the extent required under the GDPR.

9. USE OF COOKIES

9.1 Introduction

A cookie is a small file downloaded to your computer. It enables our website to identify your computer as you view different pages on our website.

Cookies allow websites and applications to store your preferences in order to present content, options or functions that are specific to you. The cookies also enable us to see information like how many people use the website and what pages they tend to visit.

The cookies we are using are gathered through various service providers. Third party cookie providers will also be able to gather and use data gathered by their cookies. For further information about cookie usage by third party provider, please check the provider's cookie and privacy policies.

When you visit our website for the first time, our cookie banner will provide you with options for accepting or rejecting cookies. By accepting, you give a consent to the use of cookies. You can control and disable use of cookies by adjusting the settings on your browser. You can, for example, disable use of cookies, allow use of all cookies or only use of first party cookies. Furthermore, you can set the browser to delete cookies after each browser session or delete them manually. Please note that disabling use of cookies may downgrade or break certain elements of the site's functionality and certain functions may not work in the usual way.

We may use cookies to collect:

- User's IP-address;
- Visited pages and time spent on page (analytics and performance);
- Browser type and info about the operating system of a device;
- Referral website and exit website after the session;
- Information provided by you (subscription or contact form);
- Social media sharing information; and
- Openings and clicks of marketing emails.

We use different types of cookies to collect the aforementioned information. In some special cases we also use cookies provided by trusted third parties. The following section details what kind of first- and third-party cookies you might encounter through this site.

9.2 Strictly Necessary Cookies

These cookies are essential for our websites and services to perform their basic functions. Without these cookies, parts of our website and services will not work as intended.

9.3 Functional Cookies

To provide you with a better user experience on our website, we offer users to set their preferences for functional cookies, which effects how this site operates when used. To remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page that is affected by your preferences.

9.4 Performance and Analytics Cookies

Performance cookies collect information on how you interact with our websites and how our website performs. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you. Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. All information these cookies collect are anonymous.

9.5 Targeting (marketing) Cookies

We use cookies or similar technologies from third party analytics providers, which help us compile aggregated statistics about the effectiveness of our promotional campaigns or other operations. These technologies enable the analytics providers to place their own cookies or other identifiers on your device, through which they can collect information about your online activities across applications, websites, or other products.

In addition, we use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work, social media sites will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies. Some of these cookies may be set when a page is loaded, or when you take a particular action like clicking a social media sharing button.

We may also obtain information from our email newsletters or other communications we send to you, including whether you opened or forwarded a newsletter or clicked on any of its content. This information tells us about our newsletters' effectiveness and helps us ensure that we're delivering information that you find interesting.

10. YOUR RIGHTS

Under applicable data protection laws, Data Subjects have numerous rights related to the personal data. You may have the right to:

- Withdraw any consent you have provided as a basis for processing your personal data. This will not affect the legality of the processing which occurred when the consent was valid and in effect.
- Request access to the processed personal data.
- Demand rectification of inaccurate personal data.
- Request the erasure, or restriction of, the processing of your personal data. However, please note that certain personal data is strictly necessary in order to achieve the purposes defined in this privacy policy and may also be required to be retained by applicable laws. Such data may not be deleted on your demand, without alterations to the underlying legal basis for the processing.
- Receive the personal data, which you have provided to the Group, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller without hindrance from the Group.

Data Subject may exercise the aforementioned rights by sending a written request to info@comrod.com. You may also use the contact information for each entity provided in section 11 below.

If you believe that the Group has not complied with applicable data protection laws when processing your personal data, you can lodge a complaint with a supervisory authority. In Norway, the relevant supervisory authority is Datatilsynet. More information is located at www.datatilsynet.no.

11. THE GROUP CONTACT INFORMATION

To exercise your rights as a data subject or to receive more information regarding our privacy practice, please contact one of the following Comrod entities:

Comrod Communication AS

Fiskaavegen 1, 4120 Tau, Norway

Tel.: +47 5174 0500

E-mail: info@comrod.com

Comrod AS

Fiskaavegen 1, 4120 Tau, Norway

Tel.: +47 5174 0500

E-mail: sales@comrod.com

Comrod France SAS

600 Chemin des Hamaïdes, BP 10119, 59732 Saint Amand Les Eaux, France

Tel.: +33 32722 8550

E-mail: sales@comrod.fr

Comrod Mission Systems AB

S:t Larsgatan 3, SE-582 24 Linköping, Sweden

Tel.: +46 13 24 93 50

E-mail: : cmssales@comrod.com

Comrod Inc.

909 Canterbury Road, Suite A, Westlake, Ohio 44145, USA

Tel.: 440-455-9186

Toll Free in USA.: 844-668-6136

E-mail: sales@comrodusa.com

Comrod Hungary Kft

Budapest, Ezred u. 2, 1044, Hungary

Tel: +36 20 425 5062

Sørskår Mekaniske Verksted AS

Fiskaavegen 1, 4120 Tau, Norway

Tel.: +47 5174 0750

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Jerol Ab

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Tel.: +46 293 663 10

E-mail: info@jerol.se