

Personal Data Policy

1. Personal Data

Personal Data means any information that may be related to an identified or identifiable individual physical person.

Alpha processes Personal Data concerning employees, clients, business partners and other third parties.

Employee Personal Data typically include contact information and information necessary for the employment management, e.g. salary information, CV, performance reviews, recruitment information, bank account number, hours worked.

Client and business partner Personal Data typically include contact information such as name, address, email address, phone number, picture and correspondence regarding the business relationship with Alpha.

2. Data Controller – Transfer of data

Alpha Corporate Finance AS deciding the means and purposes for the processing of the Personal Data is the Data Controller. Questions regarding Alpha's processing of personal data can be sent by email to alpha@alpha.no.

Alpha has implemented technical and organizational measures to protect Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. Alpha will not disclose Personal Data to other persons, except to service providers and advisers and/or their respective employees under strict confidentiality obligations. Any third parties that process personal data on behalf of Alpha, such as IT service providers, shall enter into a data processor agreement. Alpha uses the US based data processors Mailchimp (who provides the platform for submitting emails reg. deal announcements and invitations) and Salesforce (who provides the CRM platform). In addition to data processing agreements any transfer out of the EEA is based on the EU's Standard Contractual Clauses.

3. Basis for processing activities

In accordance with GDPR art. 6 Alpha only collects and processes Personal Data if at least one of the following applies:

- The data subject gives his / her consent.
- The processing is required by law.
- The processing is necessary:
 - to fulfil an agreement with the data subject or to take steps at the request of the data subject before entering such an agreement;
 - to comply with a legal obligation;
 - to preserve the data subject's vital interests;
 - for Alpha or a third party to pursue a legitimate interest which exceeds the interest of the data subject's interests regarding privacy.

The processing of Personal Data is mainly conducted by Alpha to pursue its legitimate interests in administrating the relationship with its employees, customers and business partners and for reporting and compliance purposes.

For information purposes Alpha regularly submits deal announcements and event invitations to our contacts. Receivers of such information may at any time un-subscribe to such updates and invitations by clicking the footnote of each info-mail.

Norwegian securities firms are required to record all telephone calls in relation to investment services and establish procedures to enable documentation of communication through other communication channels. Alpha therefore records all telephone calls with clients on fixed and mobile phone and stores other communication via e-mail or other platform.

4. Processing of special categories of data (sensitive data)

Alpha may only process Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of data concerning health or sex life if such processing is necessary for the purposes of carrying out the obligations and specific rights of Alpha as employer.

5. Rights of data subjects

Data subjects have the right to request access to, correction or deletion of Personal Data processed by Alpha. One may also have the right to demand limitations of the processing, objection to processing and claim the right to data portability.

Data subjects also have the right at any time to contact the supervisory authority (Datatilsynet) to address any processing of Personal Data believed to be unlawful.

6. Deletion of Personal Data

Personal Data shall be deleted when there is no longer a need to retain it.

When assessing the need to retain the information Alpha shall take into consideration whether the information may be needed in the event of a lawsuit, if the client has entered into long term agreements that still may be in force etc.

The following principles for deletion shall apply:

The following Personal Data will normally be deleted within ten years:

- Personal Data related to a client relationship, calculated from inactivity in the relationship, provided that the client does no longer hold an account with Alpha.
- Folders on projects containing mandate agreements, insider lists etc., calculated from the completion of the project.
- Telephone recordings.
- Accounting materials.

Personal Data about applicants to a position will normally be deleted when the recruitment is concluded.

One year after termination of an employment relationship Alpha shall make an assessment on the need to retain Personal Data about the employee. The information shall be deleted unless there is a need to retain the information.

After deletion Alpha may if needed and technically possible, restore and obtain back up material from external supplier.