

Data Privacy Notice

NGL Nordicity Group Ltd. and Nordicity Limited

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1. NGL Nordicity Group Ltd. (Canada)

1.1 About NGL Nordicity Group Ltd.

Nordicity Limited is a private limited company operating as a management and research consultancy. It is registered in Canada (Registry ID: 764744).

1.2 Contact details

NGL Nordicity Group Ltd.
487 Adelaide St. West Suite 203
Toronto, ON
M5V 1T4

Telephone: (416) 657-2521
Email: info@nordicity.com

Contact person: Kristian Roberts

1.3 Definitions

- "Nordicity", "we" or "us" refers to NGL Nordicity Group Limited
- "PIPEDA" refers to the Personal Information Protection and Electronic Documents Act
- "Contact information" refers to the name, email address, telephone number and place of work
- "Project files" include electronic or physical documents such as reports or spreadsheets
- "Personal data" is information that relates to an identified or identifiable individual
- "Clients" are any organisations or individuals that have contracted Nordicity to provide professional services to them at any time in the past

1.4 What type of personal data do we have

As a management and research consultancy, Nordicity currently collects the following types of personal data.

- **Clients and prospective clients:** We hold contact information for the employees of organisations that are clients or are potentially future clients of Nordicity.
- **Employees:** We hold contact information, banking information and other biographical information (e.g. date of birth) of our employees for the purpose of fulfilling our legal obligations as an employer and enrolling our employees in our private health insurance plan.
- **Prospective employees:** We hold contact information, and information on educational and professional background, solely for the purpose of recruiting new employees.
- **Subcontracted companies:** We engage other companies to be subcontractors on our consultancy projects. We hold contact information for the employees of these subcontracted companies. We

recognise that because we typically contact the employees at these corporate bodies using their personal email addresses, we require their consent before we email them any marketing materials.

- **Subcontracted sole traders:** We also engage sole traders as subcontractors on our consultancy projects. We hold contact information and banking information for these sole traders in order to maintain our business relationships with them and remunerate them for the work they perform for us. We recognise that sole traders should be treated in the same manner as private individuals, and therefore, must give us consent to email them marketing materials.
- **Representatives of organisations and members of the public who may be the subject of our research:** In the course of our research consultancy activities, we will collect and hold contact information (including names, email addresses and telephone numbers) for organisation and members of the public. We may also collect and hold information for these organisations' or persons' participation in a programme or service delivered by one of our clients. For example, this may include details of the amount of public grant or lottery funding received by an organisation or person from a public sector client.

1.5 How we get the personal data and why we have it

We obtain personal data through the following methods and for the following reasons.

- We will receive contact information directly from persons during the course of our regular business activities for the purpose of maintaining communications with us.
- As part of our research consultancy activities, we may also collect personal data (i.e. names and contact information) through an online or offline survey questionnaire. In these situations, we request that survey respondents grant us prior consent to collect their personal data. Nordicity maintains systematic controls, schedules and practices for information retention and destruction which apply to personal information that is no longer necessary or relevant (see Section 1.7).
- In some cases, as part of our research consultancy activities, we will receive personal data from our clients. We use this personal data to (i) contact people to participate in our research, (ii) distribute online or offline survey questionnaires, or (iii) conduct data analysis for the purpose of fulfilling our contractual obligations to our clients. In these cases, the client is the data controller and Nordicity is the data processor.

Under the PIPEDA, the lawful bases we rely on for processing this information are:

- a) Your consent. You are able to remove your consent at any time. You can do this by contacting us using the contact information found in Section 1.2 of this notice.
- b) We have a contractual obligation.

1.6 What we do with the personal data

We use the personal data that we receive and collect in order to:

- **Maintain regular business communications with our clients:** Our business requires us to be able to contact our clients in the future and vice versa.
- **Conduct data analysis for the purpose of fulfilling our contractual obligations to our clients:** In all cases, we maintain strict confidentiality and never share any results from our data analyses which may identify an individual or reveal any information about them.
- **Contact people to participate in our research or distribute online or offline survey questionnaires:** We only do this with contact information provided to us by clients. In these instances, we do so with the understanding that these persons have already given consent to the client to share their personal data with us.

- **Distribute certain marketing materials to clients:** We distribute by email seasonal or annual greeting cards to our clients and associates. We do this under the “opt-out” principle. We may also distribute an email newsletter to inform our clients and associates of our activities from time to time.

Nordicity never shares personal data with an outside party without receiving prior consent.

1.7 How we store your personal data

All personal data collected by Nordicity is held on one of its two secure cloud storage platforms.

- **Microsoft SharePoint, OneDrive and Office365:** Personal data contained in email correspondence, or project files is stored on our Microsoft SharePoint and Office365 cloud service.
- **DropBox:** In some cases, personal data contained in project files is stored on the DropBox cloud storage platform.

Both cloud platforms allow users such as Nordicity to be PIPEDA compliant. Both cloud platforms may store data outside of Canada. Access to both platforms is only through a password-protected account and/or password-protected device operated by Nordicity employees. Both cloud platforms provide encryption of data.

Nordicity will not disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

1.8 Your data protection rights

Under data protection law, you have rights including:

- **Your right of access:** You have the right to ask us for copies of your personal information.
- **Your right to rectification:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing:** You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing:** You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability:** You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request, please contact Nordicity using the contact information found in Section 1.2 of this notice

1.9 Website visitor data

Nordicity uses cookies to identify data traffic patterns. Cookies do not disclose the identity or personal information of an individual. Although Nordicity does not collect cookies for this purpose, they may provide information that identifies a computer, a browser or an internet setting.

Nordicity uses Google Analytics to collect standard internet log information and details of visitor behaviour patterns. This information is only shared internally and is processed in a way which does not specifically identify any users.

You may disable cookies by selecting the appropriate settings on your browser or installing a browser plug-in.

1.10 How to complain

If you would like to make a complaint, please contact Nordicity using the contact information found in Section 1.2 of this notice

You may also complain directly to [Office of the Privacy Commissioner of Canada](#).

Office of the Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec
K1A 1H3

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

2. Nordicity Limited (United Kingdom)

2.1 About Nordicity Limited

Nordicity Limited is a private limited company operating as a management and research consultancy. It is registered in England and Wales (Companies House no. 06590057) and is a wholly owned subsidiary of NGL Nordicity Group Ltd. (Canada).

2.2 Contact details

Nordicity Limited
Suite 1-1
The Print House 18
Ashwin Street
London E8 3DL

Telephone: +44 203 950 1273 Email:
info@nordicity.com

Contact person: Dustin Chodorowicz

2.3 Definitions

- "Nordicity", "we" or "us" refers to Nordicity Limited
- "GDPR" refers to the General Data Protection Regulation
- "Contact information" refers to the name, email address, telephone number and place of work
- "Project files" include electronic or physical documents such as reports or spreadsheets
- "Personal data" is information that relates to an identified or identifiable individual
- "Clients" are any organisations or individuals that have contracted Nordicity to provide professional services to them at any time in the past

2.4 What type of personal data do we have

As a management and research consultancy, Nordicity currently collects the following types of personal data.

- **Clients and prospective clients:** We hold contact information for the employees of organisations that are clients or are potentially future clients of Nordicity.
- **Employees:** We hold contact information, banking information and other biographical information (e.g. date of birth) of our employees for the purpose of fulfilling our legal obligations as an employer and enrolling our employees in our private health insurance plan.
- **Prospective employees:** We hold contact information, and information on educational and professional background, solely for the purpose of recruiting new employees.
- **Subcontracted companies:** We engage other companies to be subcontractors on our consultancy projects. We hold contact information for the employees of these subcontracted companies. We recognise that because we typically contact the employees at these corporate bodies using their personal email addresses, we require their consent before we email them any marketing materials.
- **Subcontracted sole traders:** We also engage sole traders as subcontractors on our consultancy projects. We hold contact information and banking information for these sole traders in order to maintain our business relationships with them and remunerate them for the work they perform for

us. We recognise that sole traders should be treated in the same manner as private individuals, and therefore, must give us consent to email them marketing materials.

- **Representatives of organisations and members of the public who may be the subject of our research:** In the course of our research consultancy activities, we will collect and hold contact information (including names, email addresses and telephone numbers) for organisation and members of the public. We may also collect and hold information for these organisations' or persons' participation in a programme or service delivered by one of our clients. For example, this may include details of the amount of public grant or lottery funding received by an organisation or person from a public sector client.

2.5 How we get the personal data and why we have it

We obtain personal data through the following methods and for the following reasons.

- We will receive contact information directly from persons during the course of our regular business activities for the purpose of maintaining communications with us.
- As part of our research consultancy activities, we may also collect personal data (i.e. names and contact information) through an online or offline survey questionnaire. In these situations, we request that survey respondents grant us prior consent to collect their personal data and apply our policy of destroying the personal data within 12 months of collecting it (see Section 2.7).
- In some cases, as part of our research consultancy activities, we will receive personal data from our clients. We use this personal data to (i) contact people to participate in our research, (ii) distribute online or offline survey questionnaires, or (iii) conduct data analysis for the purpose of fulfilling our contractual obligations to our clients. In these cases, the client is the data controller and Nordicity is the data processor.

Under the GDPR, the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting us using the contact information found in Section 2.2 of this notice.
- We have a contractual obligation.

2.6 What we do with the personal data

We use the personal data that we receive and collect in order to:

- **Maintain regular business communications with our clients:** Our business requires us to be able to contact our clients in the future and vice versa.
- **Conduct data analysis for the purpose of fulfilling our contractual obligations to our clients:** In all cases, we maintain strict confidentiality and never share any results from our data analyses which may identify an individual or reveal any information about them.
- **Contact people to participate in our research or distribute online or offline survey questionnaires:** We only do this with contact information provided to us by clients. In these instances, we do so with the understanding that these persons have already given consent to the client to share their personal data with us.
- **Distribute certain marketing materials to clients:** We distribute by email seasonal or annual greeting cards to our clients and associates. We do this under the 'soft opt-in' principle. We may also distribute an email newsletter to inform our clients and associates of our activities from time to time.

Nordicity never shares personal data with an outside party without receiving prior consent.

2.7 How we store your personal data

All personal data collected by Nordicity is held on one of its two secure cloud storage platforms.

- **Microsoft SharePoint, OneDrive and Office365:** Personal data contained in email correspondence, or project files is stored on our Microsoft SharePoint and Office365 cloud service.
- **DropBox:** In some cases, personal data contained in project files is stored on the DropBox cloud storage platform.

Both cloud platforms allow users such as Nordicity to be GDPR compliant. Both cloud platforms may store data outside the European Union. Access to both platforms is only through a password-protected account and/or password-protected device operated by Nordicity employees. Both cloud platforms provide encryption of data.

Nordicity has a policy of irrevocably deleting any personal data that it has held for a period of 12 months, unless it receives consent to hold the personal data for longer.

2.8 Your data protection rights

Under data protection law, you have rights including:

- **Your right of access:** You have the right to ask us for copies of your personal information.
- **Your right to rectification:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing:** You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing:** You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability:** You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request, please contact Nordicity using the contact information found in Section 2.2 of this notice

2.9 Website visitor data

Nordicity uses cookies to identify data traffic patterns. Cookies do not disclose the identity or personal information of an individual. Although Nordicity does not collect cookies for this purpose, they may provide information that identifies a computer, a browser or an internet setting.

Nordicity uses Google Analytics to collect standard internet log information and details of visitor behaviour patterns. This information is only shared internally and is processed in a way which does not specifically identify any users.

You may disable cookies by selecting the appropriate settings on your browser or installing a browser plug-in.

2.10 How to complain

If you would like to make a complaint, please contact Nordicity using the contact information found in Section 2.2 of this notice.

You may also complain directly to [Information Commissioner's Office](#).

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow Cheshire
SK9 5AF

Helpline number: 0303 123 111