

Privacy Policy – Bane NOR SF, Learning

1. Introduction

All processing of personal data at Bane NOR will take place in accordance with Norwegian legislation, including The Personal Data ACT and the General Data Protection Regulation (GDPR) and other Norwegian legislation regulation of Bane NOR`s learning activities.

Bane NOR learning, including The Norwegian Railway Academy (NJ), is the railway sector`s leading competence centre and course provider of professional railway training. This includes but is not limited to processing of data about our own employees, external instructors, course participants that are already Bane NOR employees and external course participants.

All processing of personal data by Bane NOR learning is necessary to be able to deliver the services that NJ and other learning activities are set out to do by Bane NOR.

When undertaking a course at Bane NOR, different types of personal data about you will be processed. Personal data is defined as any information relating to an identified or identifiable natural person.

This privacy policy deals with Bane NORs processing of personal data when you are a student or course participant at the academy, regardless of whether you are a Bane NOR employee or an external participant. For information about the processing of personal data about you as an employee of Bane NOR, see Bane NOR`s privacy policy for employees available at the intranet. If you are in contact with Bane NOR in other ways than as a student, course participant or employee, please see the privacy policy available at www.banenor.no.

2. Data controller

Bane NOR SF is data controller for the processing of personal data executed by NJ and other learning activities within Bane NOR learning.

3. Legal basis for processing of personal data

All processing of personal data at Bane NOR learning is carried out pursuant to the GDPR and/or other relevant laws and regulations.

As a provider of educational courses, Bane NOR`s processing of data is carried out under the provisions of regulations on training of personnel with work tasks of importance to railway safety and other laws and regulations setting out requirements for training in companies run by or for Bane NOR.

In order to process personal data about students and course participants, Bane NOR learning must have a legal basis for processing of personal data pursuant to Article 6 of the GDPR. Most of Bane NOR learning`s processing activities are pursuant to Article 6 b, c or f; the processing has basis in law, is necessary for the performance of a contract or is necessary for the purposes of the legitimate interested pursued by Bane NOR.

4. Collection of personal data

The personal information that is processed about you as a course participant is obtained primarily through information that you provide in connection with the registration process and educational

course participation. In addition, some information can be obtained from public registers and from other public bodies. If you are a course participant and is already a Bane NOR employee, much of the information will be obtained from what has already been registered about you as an employee. In addition, information will be generated during the course of the education or course participation, for example exam results.

You will also leave electronic traces using access cards, IT systems, digital tools and for some locations also through camera surveillance.

5. Personal data being processed

The types of personal data being processed is wide-ranging and varies with each individual processing. Bane NOR learning only processes information relevant to the legitimate purpose of each processing activity.

6. Security of processing

Your information will be registered in various IT systems and services. In addition, Bane NOR may have information about you in paper documents.

Bane NOR works continuously to ensure that your personal information is stored so that the information is protected against unauthorized access. Access to your information shall be limited to your employer, administrative personnel, personnel with official needs, or public authorities authorized to access the information.

Bane NOR conducts regular risk and vulnerability analyses of the computer systems used, to secure your personal information.

7. Data processors and transfer of personal data

Disclosure of your personal information to others shall never take place without a legal basis.

In some cases, Bane NOR discloses personal information to third parties. Examples of such third parties are external instructors and the Norwegian Railway Authority.

In many cases, external partners process personal data on behalf of Bane NOR, for example by operating several central IT systems. When others process personal data on our behalf in order to operate a system or provide a service, a data processing agreement is entered into to ensure information security and to ensure that personal data is not used for anything other than the specific purpose.

8. Storage of personal data

Your personal information is stored for as long as is necessary to fulfil the purpose for which it was collected, such as managing the course participation, or to comply with government requirements or legal obligations.

9. Bane NOR learning - processing of personal data

Below you will find an overview of the most important types of processing of personal data done at Bane NOR learning. The overview is not complete or exhaustive.

a. Administration of education and courses

Bane NOR learning processes information about you in order to administer various matters related to the study or course relationship. We process various personal data, for example to manage course registration, register attendance, register exam assignments, perform evaluations or issue course certificates. Processing of personal data for these purposes is necessary to fulfil the tasks assigned to NJ.

b. Access control and logging

Personal information is processed in connection with various forms of access control and logging. Personal information is registered in connection with the administration of access cards and entrances and exits of all who are authorized for access Bane NOR's buildings and facilities. Furthermore, the IT systems are monitored for the purpose of detecting security breaches and incidents.

All forms of access control and logging are done for security purposes. The GDPR and the Working Environment Act set strict limits for access to use information from access control and logs for purposes other than security.

The processing of personal data is pursuant to a legitimate interest pursued by Bane NOR. Bane NOR has assessed that access control and logging is necessary to secure our properties and to ensure the safety of our employees in the event of any incidents.

c. Other

Bane NOR also processes personal information about you for certain purposes other than those mentioned above. Examples include administration of user accounts in various IT systems, publicity and publication on the inter- and intranet, administration of canteen accounts and event registrations. Common to these other purposes is that the processing of personal data takes place on the basis of law, employment contract, Bane NOR's legitimate interest and in some cases consent.

d. Casework and filing

Bane NOR uses the Public360 archive and case processing system with electronic record keeping and electronic storage of documents. Exam results are archived in Bane NORs systems for learning. Special security measures and routines for information sharing and access have been established in the archive.

Bane NOR is subject to the Public Access to Information Act and has a public postal journal. Personal information that is required by law to be confidential is protected.

10. Your rights as a data subject

- Upon request, you have the right to be given information about which personal data Bane NOR learning processes about you, and to be given access to these.
- You may request that Bane NOR correct or supplement information about you that is incorrect or misleading. In certain situations, you can request that Bane NOR delete information about you.
- In certain cases, you have the right to protest Bane NOR's processing of personal data about you.
- In some cases, you can request that Bane NOR restrict the processing of your personal data.

11. Contact and complaint

For further information about Bane NORs processing of personal, you may contact Bane NORs data protection officer at personvern@banenor.no.

You have the right to complaint about our processing of personal data to the Norwegian Data Protection Authority, see www.datatilsynet.no.