**Regarding the collection, usage, and processing of Carbfix’s customer’s personal information.**

1. **General**

Carbfix is a subsidiary company of Reykjavik Energy (OR) and specializes in injecting carbon dioxide (C02) underground for permanent mineral storage. In addition, Carbfix offers consultancy services both within Iceland and abroad with the purpose of covering each phase of carbon mineral storage, including reducing the release of greenhouse gases and site-specific feasibility studies. Carbfix also emphasizes research and development within the field of carbon mineralization.

Carbfix’s relationship with its customers is based on a contractual obligation where Carbfix is to provide services or assume the role of an advisor in the field of carbon mineralization. For Carbfix to fulfil the terms of the contract, the company is required to gather, register, save and process certain personal information about its customers. Carbfix does not gather or process any personal information that may be deemed sensitive according to Icelandic law or the GDPR.

Carbfix guarantees that all processing of its customers personal information is in accordance with Carbfix’s privacy policy, the Icelandic act on data protection, and the processing of personal data and the GDPR. The purpose of this document is to act as an addition to Carbfix’s privacy policy and to provide our customers with sufficient information regarding our processing of their personal information.

1. **Purpose for processing of personal information**

Carbfix collects and processes certain personal information about its customers in order to provide its services, as well as charge a reasonable fee for provided services. The collection of data is also done to guarantee the quality of Carbfix’s services.

Personal information may also be processed for marketing purposes, such as analysing marketing opportunities with the aim of adding to or improving Carbfix’s services.

Personal information may be processed for a different purpose than the aforementioned. Carbfix currently uses electronic surveillance on its properties for which its purpose may vary, however, the main purpose for said surveillance is to guarantee the safety of our employees and the quality of our services. Electronic surveillance is also used for other security reasons, such as property protection. This includes video surveillance inside and around Carbfix’s properties, tachographs and radio communication devices using the Tetra communications software. The rules and regulations set by the Data Protection Authority (Persónuvernd) and Carbfix’s internal operating handbook apply for electronic surveillance. Details regarding the purpose for electronic surveillance, who is subjected to it, when and where individuals may be subjected to it and Carbfix’s duties regarding said surveillance may be found in the rules and regulations.

Carbfix guarantees that its customers personal information shall only be processed for the above-mentioned purposes unless the customer gives Carbfix full consent for his personal information to be processed for a different purpose.

1. **Processing of personal information, what rules and regulations apply?**

The processing of Carbfix’s customers personal information, whether they are an individual or an individual representing a legal entity, is necessary for the purpose of fulfilling mutual contractual obligations between Carbfix and its customers, these obligations may come in the form of services relating to the storage of carbon or other advisory services. In addition, some personal information may be processed because of a legal obligation imposed by Icelandic law, for example the public archives act, no. 77/2014 and the accounting act, no. 145/1994.

When consent is given for the processing of personal information the customer also agrees to certain terms regarding the processing. These terms will not change unless the customer gives his consent for those changes.

1. **Types of personal information that is processed**

Carbfix mainly collects and processes the following types of personal information about its customers and their employees.

* 1. Name
	2. Identification number
	3. Address
	4. Phone number
	5. E-mail address
	6. Banking details, if necessary
	7. Communication information
	8. Pictures and videos, gathered by electronic surveillance in and around Carbfix’s properties

Any communication between Carbfix and a customer on social media is subject to the rules of the given social media platform the communication goes through. However, if said conversation is moved into Carbfix’s databases, Carbfix’s rules on data protection apply.

1. **Web cookies**

Carbfix collects personal information with the use of web cookies. Cookies are small text files which are stored on the user’s browser. These cookies are used to identify users and gives Carbfix the opportunity to improve both the website itself and user experience.

There are four different types of cookies used on Carbfix’s website. First and foremost are the cookies that are deemed necessary for the proper functioning of the website. Carbfix also utilizes statistical- and settings-oriented cookies, which collect anonymous statistical information regarding user traffic on the website. Marketing cookies are also used on Carbfix’s website which collect information about the user with the purpose of showing the user advertisements that are more suited to his interests.

Further information regarding Carbfix’s utilization of web cookies can be found in the company’s privacy policy.

1. **Recipients of personal information about Carbfix’s customers or their employees**

Carbfix either stores its customer’s personal information on its own behalf in Iceland or with a verified partner within the EEA, where the rules and regulations on data protection and privacy are the same as in Iceland. Personal information will never be handed over to a third-party, unless it is mandatory by law, government directive, court order, processing agreement or with the customer’s full consent.

1. **Duration of customer’s personal information storage**

Personal information is stored by Carbfix for the time required by law or is necessary with regards to the purpose of the storage. Carbfix is publicly owned and must therefore abide by the law of public archives, which limits Carbfix’s authority to delete any data in its possession. Personal information, which Carbfix is permitted to delete, will be deleted following an approval from a city archives archivist.

1. **Customer’s right to protest, access, correction and deletion of personal information**

A customer or his employee has the full right to contest any processing of his personal information by Carbfix if he deems the processing not in accordance with its purpose or against the principal of proportionality.

A customer or his employee can request information regarding the processing of his personal information at Carbfix if not hindered by the interest of another individual or legal entity. A request for the aforementioned information should be processed in a swift manner and should take no longer to process than one month from the day that the original request was received.

A customer or his employee may also have the right to demand that all wrong, misleading, or improper personal information regarding him to be either corrected or deleted.

1. **Customer’s right to file a complaint and to comment on the processing of his personal information**

Any complaints or comments that a customer or his employee have regarding the processing of his personal information should be directed towards Carbfix. In the event of Carbfix not responding to a complaint, a customer or his employee may send the complaint to the Reykjavik Energy corporation privacy officer at personuverndarfulltrui@or.is.

A customer may also file a complaint to the Icelandic Data Protection Authority at www.personuvernd.is.

1. **Accuracy and reliability of information**

Carbfix is liable for the reliability of personal information, and that any information regarding a customer or their employees is always updated accordingly.

A customer and his employees must notify Carbfix regarding any changes that must be made to his/her personal information that is stored by Carbfix or by a third-party individual or legal entity in accordance with article six.

1. **Security of personal information concerning a customer or his employees**

Carbfix ensures the safety of personal information with technical- and organisational measures. Further information regarding these measures can be found in the internal operating handbook.

Access to personal information about a customer is limited to a group of staff which necessarily require such access in order to achieve the purpose of the processing. Employees are informed and aware of their duty to maintain the confidentiality and security of personal information to which they have access. Confidentiality remains after termination or resignation.

The information security management system is structured in consonance with ÍST ISO/IEC 27001:2017 safety standard. All security measures within the Reykjavik Energy corporation are implemented in accordance with the standard. The information security management system is certified by an accredited certification body (BSI).

In other respects, than mentioned above, the processing of personal information shall always be in accordance with Icelandic law, especially law no. 90/2018 about data protection and the processing of personal information as well as the GDPR.

Reykjavik Energy Group’s privacy officer is Hörður Helgi Helgason, attorney at law at Landslög law firm, Borgartún 26, 105 Reykjavík, telephone: 520-2900, personuverndarfulltrui@or.is.

1. **Reference**

 [STE-450](http://handbok.or.is/openFromWord.aspx?docname=STE-450); Carbfix‘s data protection polisy.