



**1. Does the Visual Registration System have a data processing agreement?**

Yes, Visual Registration Systems' data processing agreement can be found on our website, <https://www.visualregistration.no/personvern>

**2. Are personal information in the Visual Registration System secured in a responsible manner?**

All personal data is stored securely at our subcontractors' data centers. All data transfer from these data centers is done over encrypted lines and is protected by the Visual Registration Systems access system. To access this data you can use several forms of login. For example, employee number and pin and login using email and password. For security reasons, we recommend that all customers who use the employee number and pin have at least 4 characters in their PIN.

**3. Where is data located? (Geographical) - And from which countries does human access even if the data is in Norway / EU?**

Data is located in Northern Ireland, at Microsoft Azure. No one outside the EU has access to data, nor do we have subcontractors located outside the EU / EEA.

**4. Can the Visual Registration System delete Employee Data if desired?**

Yes, we can. Upon request from the Customer, the Visual Registration System can delete the data that Customer wishes. When users are deleted in our systems, we have routines in place that prevent errors that lead to irreversible loss of data. In many cases, customers must manually confirm deletion of customer data, including personal data.

**5. Does the Visual Registration System automatically delete data?**

No, the Visual Registration System does not have the opportunity to delete data from the customer's database without a customer's request. We will never delete data without the specific consent of the customer. To delete data, mail must be sent to [post@visualregistration.no](mailto:post@visualregistration.no)

**6. How is deletion taken care of at the termination of the agreement between the parties?**

By default, Visual Registration System takes care of the customer's data for 6 months after termination, unless otherwise agreed with the customer. If the customer wants all data deleted immediately, this is done clearly.

## **7. What data is stored in the Visual Registration System?**

The data processing agreement contains a list of all data that can be stored in the Visual Registration System. The data actually stored is up to the customer.

## **8. Does the Visual Registration System have annual security audits?**

Yes, the Visual Registration System performs annual security audits.

## **9. Does Visual Registration System have routines and alerts for security breaches?**

Yes, all nonconformities that persons outside the Visual Registration System or at the data processor get access to data are notified to the Customer. It is the customer's responsibility to notify the data controller, but we can help in designing the notification.

## **10. Does Visual Registration Systems have a duty of confidentiality in relation to personal data being processed?**

Yes, all employees of Visual Registration System have a duty of confidentiality in relation to the data responsible data.

## **11. Does Visual Registration System use cookies?**

The Visual Registration System uses cookies to control the login and collect logging for use in debugging.

This logging does not contain personal data, and there is also anonymous data - it will therefore have no impact on GDPR.

## **12. Does the Visual Registration System ensure the processing of data is legal?**

What is legal processing of data varies greatly from company to company. It is therefore not possible for us to ensure legal treatment in general in the system.

But we work closely with Hammervoll & Pind (<https://hammervollpind.no/>), who have the expertise to guide your company in legal treatment.

## **13. When will GDPR be valid for Norway?**

The regulation began to apply in the EU on 25 May 2018, and in Norway it entered into force on 20 July 2018.

#### **14. Can we, as customers, send the Visual Registration System our own "standard" data processing agreement for signing the Visual Registration System?**

The data processing agreement made available from the Visual Registration System will satisfy the requirements of the new Personal Data Act and GDPR. Since there is a close connection between the services of the Visual Registration System, the terms governing the services and the data processing agreement, it is important that these terms and the data processing agreement apply to the services of the Visual Registration System.

Some customers have sent us their standard data processing agreements to cover the services of the Visual Registration System, but since these agreements are standardized, they are rarely adequate for the services of the Visual Registration System and do not adequately regulate the processing of personal data resulting from the services.

The Visual Registration System therefore requests that the data processing agreement that comes from us regulates the services of the Visual Registration System and the processing of personal data resulting from these, and that no other data processing agreement is sent to the Visual Registration System. Data processing agreements received by Visual Registration System that are not adequate for Visual Registration Systems services cannot be entered into, and Visual Registration Systems' data processing agreement should be used instead.

Do you have further questions about the Visual Registration System and GDPR? Send us an email at [post@visualregistration.no](mailto:post@visualregistration.no)