

# Privacy policy for Mehrwerk AS

Valid from February 2026

Mehrwerk AS ("Mehrwerk", "we", "us", "our") provides a number of different services, both directly to consumers and in collaboration with partners who make our services available to their customers. Below you can read about how Mehrwerk processes the personal data that we collect in connection with the provision of services to you. Personal data is information about you that can directly or indirectly identify you, such as a name, date of birth, national ID number, credit card number, address, telephone number, e-mail address and all information related to this.

This privacy policy applies to all of our consumer services that do not have a separate privacy policy associated with them.

## Content

1. Data Controller	3
2. Processing of personal data	4
2.1 How we collect personal information	4
2.1.1 Information from you	4
2.1.2 Information from third parties	4
2.2 The type of information we collect, what we use it for (purpose of processing), the legal basis for the processing and deletion	5
2.2.1 Your name, national ID number, and contact information	5
2.2.2 Details regarding ticket orders or other individual transactions	5
2.2.3 Details regarding payment for the service (if you pay for the services you receive from Mehrwerk yourself)	6
2.2.4 Information about your use of the service and information about your case	6
2.2.5 Your gender	7
2.2.6 Extended retention upon active membership or continued access to the service	7
2.2.7 Your consent to receive marketing materials	7
2.2.8 Anonymized data	8
2.2.9 Backup data	8
2.3 Children's personal data	9
2.4 Other people's personal data	9

2.5 Cookies	9
2.6 Extended retention in the event of legal claims	9
3. Sharing of personal data	10
3.1 Sharing your personal data with third parties	10
3.1.1 We disclose personal data where it is necessary for us to perform the agreement to provide the services to you:	10
3.1.2 We disclose personal data where we have a legitimate interest in sharing the information:	10
3.2 Sharing personal data with subcontractors/data processors	11
3.3 Sharing of anonymized information	11
3.4 Sharing of data for legal compliance purposes	11
3.5 Third-party websites and products	11
4. Transfer of personal data abroad	12
5. Your rights	13
5.1 Right of access	13
5.2 Right to rectification	13
5.3 Right to erasure («right to be forgotten»)	13
5.4 Right to restriction of processing	13
5.5 Right to object	14
5.6 Right to data portability	14
5.7 Right to lodge a complaint	14
6. If personal data is not provided	15
7. Security	15
8. Updates to this privacy policy	15

## 1. Data Controller

Mehrwerk AS is the data controller for personal data collected in accordance with this privacy policy.

Contact information for Mehrwerk:

Company name: Mehrwerk AS

Company registration number: 939 118 756

Office and postal address: Kjørbokollen 30, 1337 Sandvika, Norway

Website: <https://mehrwerk.com/en>

If you have any questions or complaints regarding Mehrwerk's processing of your personal data, you can contact our customer service or write to us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com).

## 2. Processing of personal data

### 2.1 How we collect personal information

#### 2.1.1 Information from you

We collect personal information *directly from you* when you

- register to order our services or products
- contact us regarding the services
- register information in your customer account
- sign up for our newsletters.

#### 2.1.2 Information from third parties

We may collect information about you *from a partner* if you receive access to our services through your membership with, or customer relationship with, one of our partners. In such cases, our partners will, in accordance with their agreement with you, send us information that identifies you as a customer, such as name, national ID number or customer number, and your contact information, such as your email address or telephone number, so that we can confirm that you are entitled to use our services and contact you directly in connection with the delivery of the services, if this follows from your agreement with the partner.

If your agreement with us or one of our partners gives your household members the right to use our services, we may receive information about you *from your household members* when they contact us.

We may receive subscriptions to our newsletters containing your name and email address *from a partner* if you have given the partner your express consent to subscribe to our newsletter.

We may receive personal information about you *from third parties* if your use of the service you receive from Mehrwerk involves Mehrwerk communicating with a third party regarding you (for example, we may receive information from creditors upon authorization from you if you use our ID theft protection service or information from websites if you use the Web Cleanup service).

If you make a payment to us through a website, we receive information about your payment from our payment solution provider. (We only receive card details directly from you if you place an order with us over the phone.)

## 2.2 The type of information we collect, what we use it for (purpose of processing), the legal basis for the processing and deletion

The type of information we collect will vary depending on the services you receive, your use of the service, your communication with us, and whether you pay for the service yourself or receive the service for free through your customer relationship with one of our partners. Below are examples of information we may collect about you when you use our services.

### 2.2.1 Your name, national ID number, and contact information (address, email address, phone number, etc.)

- The purpose of the processing: To provide the service you subscribe to or are using (to identify you as a customer, verify that you or one of your household members are entitled to use our services, register you for the services, contact you and any third parties if necessary and invoice or charge you for the service if you are purchasing the service directly from Mehrwerk).
  - The legal basis for the processing: The processing is necessary for the performance of a contract to which you are a party.
- The purpose of the processing: To contact you regarding your use of, and experience with, the service in order to improve the content of the service.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Extended processing and deletion: The information described in this section 2.2.1 will be linked to any information we process about you as described in the sections below and will be processed for the purposes and on the legal bases described there. The information is retained if and for as long as we have a valid reason to retain it in accordance with the sections below.

### 2.2.2 Details regarding ticket orders or other individual transactions (such as emergency cash) (e.g. name and date of event or transaction, number of tickets, payment information (amount, payment method, date, card number, reference number) etc.)

- The purpose of the processing: Storing data in accordance with the Norwegian Bookkeeping Act.
  - The legal basis for the processing: The processing is necessary for compliance with a legal obligation to which Mehrwerk is subject.
- The purpose of the processing: Processing your payment.
  - The legal basis for the processing: The processing is necessary for the performance of a contract to which you are a party.
- The purpose of the processing: To respond to questions and handle any complaints or claims from you while you have access to the service.
  - The legal basis for the processing: The processing is necessary for the performance of a contract to which you are a party.
- The purpose of the processing: To respond to questions and handle any complaints from you after your access to the service has ended and to defend any legal claims.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Time of deletion: Five years after the end of the fiscal year the transaction was completed.

Please note that our payment solution provider is responsible for payment information that you provide to the payment solution provider via our payment solutions or that the payment solution provider receives from us when you pay for products or services that you order from Mehrwerk. We are responsible for payment information that we receive from the payment solution provider as described above. (We do not receive card details from the payment solution provider.)

### 2.2.3 Details regarding payment for the service (if you pay for the services you receive from Mehrwerk yourself) (e.g. name of the service, paid amount, payment method, date, card number or account number, invoice information)

- The purpose of the processing: Storing data in accordance with the Norwegian Bookkeeping Act.
  - The legal basis for the processing: The processing is necessary for compliance with a legal obligation to which Mehrwerk is subject.
- The purpose of the processing: Processing your payment.
  - The legal basis for the processing: The processing is necessary for the performance of a contract to which you are a party.
- The purpose of the processing: To respond to questions and handle any complaints or claims from you while you have access to the service.
  - The legal basis for the processing: The processing is necessary for the performance of a contract to which you are a party.
- The purpose of the processing: To respond to questions and handle any complaints from you after your access to the service has ended and to defend any legal claims.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Time of deletion: Five years after the end of the fiscal year the transaction was completed.

Please note that our payment solution provider is responsible for payment information that you provide to the payment solution provider via our payment solutions or that the payment provider receives from us when you pay for the service. We are responsible for payment information that we receive from the payment solution provider as described above. (We do not receive card details from the payment provider.)

### 2.2.4 Information about your use of the service and information about your case (e.g. your inquiries, complaints, requests and orders, contact with and information from relevant third parties (e.g. creditors if you use our ID theft protection service, websites if you use the Web Cleanup service and hotels if you use our Concierge service), information that you enter into your customer account through our customer portal or into our digital services, as well as information about any inquiries you have made in accordance with section 5 below)

- The purpose of the processing: To provide the service to you (contacting you, contacting relevant third parties and processing your case).
  - The legal basis for the processing: The processing is necessary for the performance of a contract to which you are a party.
- The purpose of the processing: to provide you with a better service by being able to see what kind of requests and usage you have had in the past.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- The purpose of the processing: To respond to questions and handle any complaints or claims from you while you have access to or are using the service.

- The legal basis for the processing: The processing is necessary for the performance of a contract to which you are a party.
- The purpose of the processing: To respond to questions and handle any complaints from you after your access to the service has ended and to defend any legal claims.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- The purpose of the processing: To respond to questions and handle any complaints from you in connection with any inquiries or requests you have made in accordance with section 5 below and to defend any legal claims.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Time of deletion: The information is deleted 3 years after your case is closed. If you have communicated with us via email without a case being created or in connection with services other than ID theft protection service (assistance in the event of ID theft) or Web Cleanup (assistance regarding misuse of information on the internet), the email will be deleted 3 years after the email was sent. However, chats are deleted immediately after the chat ends (but if you have left comments on offers from our Concierge service, these are stored with the offer for three years as described above). Exceptions apply to information that you have entered into our blocking service or object registration service, which is deleted 3 months after you no longer have access to the service. Information that you have entered into our internet monitoring service will be deleted immediately after your subscription has ended.

## 2.2.5 Your gender

- The purpose of the processing: To create anonymous statistics.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Time of deletion: The information is deleted 3 years after your case is closed.

## 2.2.6 Extended retention upon active membership or continued access to the service

If you have an active membership with us, or are registered with us as a customer with access to our services, we will retain the information for as long as you are a customer with us and/or have access to the services. We will then retain the information for another six months to avoid the loss of important information if your customer relationship or access to the services has ended in error (for example, due to an error in billing/payment). This means that we may retain your information for up to 6 months after your membership or registration ends, even if more than 5 years have passed since the end of the financial year in which any transaction or payment took place or more than 3 years have passed since your case was closed, as stated in sections 2.2.1-2.2.5. (This does not apply, however, to certain offers from our Concierge service, which will be deleted after three years regardless of any continued membership or access).

## 2.2.7 Your consent to receive marketing materials

If you sign up for one of our newsletters or consent to receive marketing material from us, we will record your consent and your name and contact information. We will also record the date of consent and what you have consented to.

- The purpose of the processing: To deliver the newsletter or marketing materials to you.

- The legal basis for the processing: You have given your consent by actively subscribing to the newsletter (or by expressly giving our partner permission to activate your subscription to the newsletter) or by expressly giving us consent to send you the marketing material.
- The purpose of the processing: To demonstrate that you have consented to receive marketing materials from us and to defend any legal claims.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Time of deletion: Your name and contact information will be stored in our marketing database for as long as you subscribe to the newsletter or until you withdraw your consent to receive marketing materials from us. You can withdraw your consent at any time by clicking on the unsubscribe link in the newsletter or by adjusting your user settings in your user account, if you have one. The consent record (including your name, contact information, date of consent and what you have consented to) will be stored for three years from the last communication sent from us containing marketing materials. This information will only be used to prove that consent has been given, should it become necessary.

## 2.2.8 Anonymized data

We anonymize personal data (collected in accordance with section 2) so that it cannot identify you in any way.

- The purpose of the processing: Use in statistics and mapping to improve the service.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Time of deletion: As the anonymized data no longer contains personal data, the data may be stored indefinitely.

## 2.2.9 Backup data

We make backups of data that we have collected as set out above.

- The purpose of the processing: To ensure that important information is not lost in the event of a data breach or other problems with our IT systems. The information is only used to restore data that has been accidentally deleted or damaged.
  - The legal basis for the processing: The processing is necessary for the purposes of a legitimate interest pursued by Mehrwerk.
- Time of deletion: Backup data may be stored for up to three months. This means that data that has been deleted from our active systems may exist in the backup system for up to three months after it has been deleted as stated above or in accordance with section 5.3 below.

## 2.3 Children's personal data

We only collect personal information about children in connection with a child's use of our services or if a parent or guardian uses a service on the child's behalf. If the child is over 15 years old (13 years old when using the online abuse assistance/Web Cleanup service), we require the child's consent for the parent or guardian to use the service on the child's behalf.

## 2.4 Other people's personal data

If you provide us with personal data about other people, you must have consent from the relevant persons to provide us with such information.

## 2.5 Cookies

Our websites use cookies and other similar technologies to improve the customer experience and analyse the use of our websites. The purposes of the different cookies and technologies are described in the cookie policy and/or consent management tool of the individual website.

Many cookies do not collect personal data, but in some cases we may use cookies or similar technologies to collect personal data about the user of a website in the form of the user's IP address or other unique identifier and associated information about the user's device and software (e.g. operating system, browser type, date/time of the user's visit and other similar information). IP addresses are used to determine the user's approximate location (city/municipality). Once this location is registered, the IP address is anonymized so that we cannot link the collected information to the user. The purpose of processing the collected information is to analyse how visitors use the website, for example to see which sites are most visited, which sites users arrive from, where users are located, at what time the sites are most visited, etc. We may also, for example, use cookies or similar technologies to see how a single user navigates through a website, and whether the same user visits a website multiple times. Unless otherwise stated in the consent management tool of the website you are visiting, the legal basis for the processing is that we have a legitimate interest in using the information to analyse how our websites are used.

Cookies and similar technologies that are not considered strictly necessary are only used with your consent. You can withdraw or manage your consent to the use of such cookies/technologies at any time in the consent management tool of the relevant website. In cases where third-party cookies/technologies are used, the relevant third parties may collect information directly from our sites. Such third parties may process personal data in or outside the EU/EEA and they are responsible for their own data processing. Information about which cookies/technologies are set by third parties can be found in the cookie policy or consent management tool of the individual website.

## 2.6 Extended retention in the event of legal claims

If legal claims are made in connection with the delivery of our services or our processing of your information, we may store relevant information regarding the case until the case is finally resolved and possibly longer if required by law or authorities.

## 3. Sharing of personal data

### 3.1 Sharing your personal data with third parties

3.1.1 We disclose personal data where it is necessary for us to perform the agreement to provide the services to you:

- If you make a purchase from us or pay for our services over the phone, we will provide your payment information (such as card number, expiration date, amount, order number, customer number) to our payment acquirer for processing of the payment. (If you make a payment to us with a credit or debit card online, you provide your information directly to our payment solution provider through our online payment solution. We then receive a confirmation with a reference number for your payment from the payment solution provider, but we do not receive your card details.)
- If you use our Concierge service to place an order on your behalf, we will provide the information necessary to complete the order to the supplier from whom you wish to purchase a service or product. Such information will typically include your name, address, email address, and details of the product/service you wish to purchase.
- If you use our ID Protection service or Web Clean-up service, we will, in accordance with a power of attorney from or agreement with you, disclose personal information about you to creditors, websites and other relevant parties to the extent necessary to reject claims, demand content from the internet removed and otherwise deliver the service.
- If, in accordance with your agreement with us, you receive services from us that involve you accessing services provided by another provider, we may, depending on how the service and the agreement are set up, share your information with this provider so that the provider can deliver the services to you, contact you and/or confirm that you are entitled to use the service.
- If you receive our services for free through your customer relationship with one of our partners, we may share with the partner information that you or a member of your household provides to us, such as your name or customer number with the partner, in order to obtain confirmation from the partner that you or a member of your household is entitled to use our services.
- If you use our blocking service to block your credit cards, we will share necessary information (e.g. name and card numbers) with the card issuers. If you have asked us to block your mobile phone subscription, we will share the necessary information with your mobile network operator.

3.1.2 We disclose personal data where we have a legitimate interest in sharing the information:

- If you have free access to our services through one of our partners and you choose to use our services, we may disclose personal information about you to the partner so that the partner can identify you as a user of the service and contact you regarding this. This is only done if the partner can confirm that the partner has a valid legal basis for processing your data.
- If we sell or otherwise transfer all or part of our business to another party, we reserve the right to transfer your personal data as part of the assets sold or transferred.
- We may share your personal data with third parties if this is necessary to establish, exercise or defend legal claims.

### 3.2 Sharing personal data with subcontractors/data processors

We share your personal data with carefully selected subcontractors who only process your data as our data processors, on our instructions, in order to deliver our services to you. The data processors cannot use your data for their own purposes. For more information about which data processors are processing your data at any given time, please contact us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com).

### 3.3 Sharing of anonymized information

We may share your information with other parties in anonymized form, so that the information does not identify you and cannot be linked to you in any way. We use such anonymized information to show how and to what extent our services are used.

### 3.4 Sharing of data for legal compliance purposes

We may share your information if we have a good faith belief that doing so is necessary to comply with applicable law or to respond to a valid legal process from e.g. the police or other government agencies or courts.

### 3.5 Third-party websites and products

Some of our products or websites may contain links to third-party websites. If you provide personal information to such third parties, the information will be subject to such third parties' privacy policies. You should familiarize yourself with such policies before sharing your information with third parties.

## 4. Transfer of personal data abroad

Mehrwerk and Mehrwerk's data processors will primarily process your personal data within the EU/EEA and the UK, but in certain cases we may process your personal data outside the EU/EEA and the UK (in so-called third countries). In cases where we transfer your data to third countries, we will take the steps necessary to transfer the personal data lawfully by ensuring that your personal data is handled securely and with an adequate level of protection and so that you have enforceable data subject rights and access to effective legal remedies, for example by entering into agreements with recipients that contain the European Commission's standard data protection clauses.

In cases where we disclose your personal data to third parties as mentioned in section 3.1.1 above, we may transfer personal data to third countries (i.e. countries outside the EU/EEA for which the EU Commission has not made an adequacy decision and where the recipient cannot necessarily guarantee the same level of protection for personal data as required by recipients in the EU/EEA), if this is necessary to perform our agreement with you. This means, for example, that if, pursuant to an agreement with us, you ask us to book a hotel room for you at a hotel in such a third country, we will disclose your booking information to the hotel without requesting the hotel to demonstrate compliance with the EU requirements for processing of personal data.

In individual cases, we may transfer personal data to third countries if this is necessary to establish, exercise or defend legal claims or to comply with a legal obligation.

## 5. Your rights

### 5.1 Right of access

You have the right to know what personal data we process about you. If you would like to access your personal data with us, please contact our customer service or write to us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com).

### 5.2 Right to rectification

If personal data that we process about you is incorrect or incomplete, you have the right to have the data corrected. You can update and correct your personal data by contacting our customer service or writing to us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com). If you have a user account with us, you can log in and update your information directly in your profile.

### 5.3 Right to erasure («right to be forgotten»)

You have the right to have your personal data deleted if the personal data is no longer necessary for the purpose for which it was collected or processed, you withdraw any consent on which the processing is based and there is no other legal basis for the processing, you object to processing based on legitimate interest and there are no overriding legitimate reasons for the processing or if the personal data has been processed unlawfully. However, the right to deletion does not apply if processing of the personal data is necessary to establish, exercise or defend legal claims or for us to comply with a legal obligation. If you wish to have your personal data deleted, please contact our customer service or write to us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com). We will process your request and ensure that the data is deleted if you are entitled to deletion. Please note that deleting data may affect the quality of the services you receive.

### 5.4 Right to restriction of processing

You have the right to request that our processing of your personal data be restricted in the following cases:

- if you contest the accuracy of the personal data (for a period that enables us to verify the accuracy of the personal data);
- the processing is unlawful but you oppose erasure and instead request that the use of the personal data be restricted;
- if we no longer need the personal data for the purposes of the processing, but you need them to establish, exercise or defend legal claims; or
- you have objected to our processing based on legitimate interest (pending the verification of whether our legitimate grounds override yours).

If you wish to restrict our use of your personal data, please contact our customer service or write to us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com). We will process your request and arrange for restriction if you are entitled to it. We may, however, retain personal data for the establishment, exercise or defence of legal claims. Please note that restricted processing of data may affect the quality of the services you receive.

## 5.5 Right to object

You may, on grounds relating to your particular situation, object at any time to our processing of your personal data based on a legitimate interest. If you object to such processing, we will cease the processing unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or we need to process the personal data to establish, exercise or defend legal claims. If you wish to object to our processing of your personal data, please contact us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com). We will process your request and ensure that the processing ceases if you are so entitled.

## 5.6 Right to data portability

If you have provided us with personal data that we process by automated means, you have the right to receive such personal data in structured, commonly used and machine-readable format if the processing is based on your consent or the performance of a contract with you, and you then have the right to transmit this data to another controller without Mehrwerk preventing this. You also have the right to have the personal data transmitted directly from us to another controller where this is technically feasible. If you wish to receive such personal data, please contact us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com). We will process your request and ensure that you receive the data if you are entitled to it.

## 5.7 Right to lodge a complaint

If you believe that our processing of your personal data is in breach of applicable law, you can complain by writing to us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com).

You can also complain to the Norwegian Data Protection Authority (Datatilsynet) by sending a written request to the Norwegian Data Protection Authority, Postboks 458 Sentrum, 0105 Oslo, or by using the Norwegian Data Protection Authority's digital complaint form. You can find the form and more information on how to complain here: <https://www.datatilsynet.no/om-datatilsynet/kontakt-oss/klage-til-datatilsynet/>. If you have your usual place of residence or place of work in an EU/EEA member state other than Norway, or you believe that our infringement has taken place in another member state, you can complain to the supervisory authority for personal data in the relevant member state.

Special notice to UK residents:

If you are a UK resident using Mehrwerk services specifically offered to UK residents, and you believe that we have handled your personal data in violation of UK data protection law, you can call or write to our customer service. You can also complain by writing to us at [personvern@mehrwerk.com](mailto:personvern@mehrwerk.com) or use our electronic complaints form which you can find at <https://www.mehrwerk.com/regulatory>.

You also have the right to lodge a complaint with the UK supervisory authority, the Information Commissioner's Office (ICO):

Information Commissioner's Office (ICO)  
Wycliffe House, Water Lane  
Wilmslow, Cheshire SK9 5AF

You can read more about how to make a complaint with the ICO or how to get advice from the ICO here: <https://www.gov.uk/data-protection/make-a-complaint>.

## 6. If personal data is not provided

You are not obliged to provide personal data to us, but please note that if you do not provide your personal data to Mehrwerk, this may make it impossible for us to enter into agreements with you or provide services to you.

## 7. Security

Securing your information is very important to us and we use various security technologies and procedures to protect your information from unauthorized access. The personal information you provide to us is stored on computer systems with limited access so that it is only accessible to persons who need the information to process it as described in this privacy policy. However, we cannot guarantee that information processed will not be accessed by unauthorized third parties, e.g. by hacking.

## 8. Updates to this privacy policy

We will update this privacy policy if necessary to reflect changes in our services or procedures or changes in relevant regulations regarding the processing of personal data. An updated version of the privacy policy will always be available on Mehrwerk's website. Please make sure you read the latest version and understand how we process your personal data. If we make material changes to this privacy policy that change the way we collect and process your information, we will inform you of this by contacting you directly or posting a prominent notice on our website.