

## Privacy & Cookie Notice

### INTRODUCTION

Wolters Kluwer N.V. along with its various affiliated businesses (collectively, “Wolters Kluwer”, “we”, “us” or “our”) wants to inform you about the ways we process your personal information. In this Privacy & Cookie Notice we explain what personal information we collect, use and disclose.

Personal information means any data relating to an individual who can be identified, directly or indirectly, based on that information. This may include information such as names, contact details, (online) identification data, online identifiers or other characteristics specific to that individual.

This Privacy & Cookie Notice applies when you visit our websites, solutions and other services, including events and web chat communications, that refer or display a link to this notice (“Services”). This Privacy & Cookie Notice may be supplemented or replaced by additional privacy statements or terms provided to you from time to time.

- **WHO WE ARE**

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Wolters Kluwer is a global organization consisting of many companies worldwide. Personal information provided to, or collected by, Wolters Kluwer via our web pages is controlled by Wolters Kluwer Norge AS, Østensjøveien 27, 0661 Oslo, Norge and/or one of its affiliates or subsidiaries. We are committed to safeguarding the personal information of our customers, users, employees and other stakeholders, while helping our customers, employees, investors and society create a deeper impact and make the right decisions.

If you wish to contact us in relation to questions regarding your personal information, we refer you to the [‘HOW YOU CAN CONTACT US’](#) section below.

- **WHAT PERSONAL INFORMATION DO WE COLLECT?**

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The type of personal information we collect depends on your relationship with us and the Services we deliver to you. To that end, we may collect the following personal information about you:

- Name and contact details, such as, first and last name, email address, postal address, telephone number
- Work-related information, such as, job title and other employment or education information
- Account credentials, such as, passwords and other security information for authentication and access
- Financial information, such as, bank account, credit and debit card numbers for processing of payments
- Usage information, such as, behavioral information about how you navigate within our Services and which elements of our Services you use the most and information regarding the goods and/or services you wish to order, wish list, preferences, interest, etc.

- Computer, device and connection information, such as, IP address, browser type and version and location, advertising identifiers, cookie or tracker identifiers and related information
- Audio and visual information, such as your voice and image as captured in photographs, video, or audio recordings if you attend our events or leave us a message
- Any other information shared by you through our websites, apps, eStores, and other products and services, including web chat communications.

If you are under 18 years of age, please do not use or access the Services. Wolters Kluwer does not knowingly collect or maintain personal information from persons under 18 years of age. If Wolters Kluwer learns that personal information of persons under 18 has been collected on or through the Services, we will take appropriate steps to delete this information.

- **HOW WE COLLECT PERSONAL INFORMATION**

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We and our third-party service providers may collect personal information from the following sources:

- Direct interactions, such as when you register for our Services, make a purchase, or communicate with us, including through our web chat features.
- Data from third parties, such as information on third-party websites or other information you may have made publicly available, or information provided by third party sources, including but not limited to government entities and data resellers.
- Automated tracking technologies, such as information automatically collected about your interaction with our Services and websites using various technologies such as cookies, web logs and beacons and internet tags.

- **HOW WE USE YOUR PERSONAL INFORMATION**

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Personal information is used for the purposes for which it has been collected and might be further used for statutory or other legitimate purposes only. As an example, if you make use of our service contact form or web chat features on our website, we will use the information you provided in the first place to respond to your service request. We might further use that information to improve the quality of our customer service process.

Lawfulness of the processing is one of the main principles relating to the processing of your personal information - we apply the following legal processing grounds:

- processing is necessary for the performance of a contract, or in order to take steps prior to entering into a contract;
- processing is necessary for the purposes of our legitimate interests - for example, to improve the quality of our products and Services;
- processing is necessary for compliance with a legal obligation to which we are subject, or that is otherwise lawful under the applicable data protection laws;
- with your given consent.

Depending on how you interact with us and the Service, we may use your personal information for the following purposes:

- Administering our relationship with you and our business, such as providing and managing your access to and use of our Services. This processing is necessary for the performance of a contract;
- Developing and improving our new and existing products and Services, such as inviting you to participate in surveys or analyzing website traffic to optimize our websites or to personalize your experience with our Services. This processing is necessary for the purposes of our legitimate interests;
- Marketing and advertising, such as customer segmentation, providing you with marketing or advertising communications that we think you may be interested in. This processing is with your given consent or for our legitimate interests;
- Recruiting, such as assessing job applicants. This processing is in order to take steps prior to entering into a contract or with your given consent;
- Providing online communities, such as making chat rooms, web chats, forums, message boards, or news groups available to you. This processing is necessary for the performance of a contract or our legitimate interests. Please remember that any information disclosed in chat rooms, forums, message boards, and other online groups is public. We encourage you to exercise caution when disclosing personal information in these forums, as this information is made available to other users. Do not disclose information in these public forums that might be considered confidential or proprietary or that you do not wish to be publicly available or that you are prohibited from disclosing.
- Other general business support purposes, including but not limited to procurement, financial and fiscal management, risk and compliance management, and external reporting. This processing is necessary for compliance with a legal obligation to which we are subject, or that is otherwise lawful under the applicable data protection laws or for our legitimate interests.

- **SHARING YOUR PERSONAL INFORMATION**

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To be able to provide you the best possible Services and further our business operations, we may share certain information internally or with selected third parties. There might also be a certain statutory or legal obligation that we believe in good faith requires us to disclose your personal information externally. Parties we might share data with include:

- other Wolters Kluwer affiliates or subsidiaries, e.g. for customer data management or providing underpinning technology to support the Services we are delivering;
- our service providers, e.g. for managing or hosting services and/or underpinning technology for the Services we are providing;
- our business partners and advertisers, e.g. if you have purchased or expressed interest in a product or service, or have been delivered or viewed an advertisement, of such a business partner, interacted with them or otherwise authorized the sharing of your personal information with such a business partner;

- subscribing, accrediting or professional organizations, e.g. for providing utilization information to organizations that provide you with access to our Services and/or sharing tracking and redeeming credits for professional accreditation;
- organizations involved in business transfers, e.g. to a purchaser or successor entity in the event of a sale or any other corporate transaction involving some or all of our business;
- other parties, e.g. as needed for external audits, compliance, risk management, corporate development and/or corporate governance related matters; or
- governmental authorities, regulators and other third parties, in response to a legal request, court orders and/or as otherwise necessary to comply with applicable law.

Whenever we share personal information internally or with third parties in other countries, we have appropriate safeguards in place in accordance with the applicable data protection laws, including as applicable the EU Model clauses or other transfer safeguard specified in the applicable data protection laws such as binding corporate rules, a mutual agreement or derogations. As required under the applicable law, third parties are required to use appropriate safeguards to protect personal information, and they can only access the personal information that is necessary for performing their specific tasks.

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- **HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

Your personal information will be processed to the extent necessary for the performance of our obligations, to comply with legal obligations, and for the time necessary to achieve the purposes for which the information is collected, in accordance with our data retention policies and the applicable data protection laws. When we no longer need your personal information, we will take all reasonable steps to remove it from our systems and records or take steps to properly anonymize it so that you can no longer be identified from it.

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- **HOW WE PROTECT YOUR PERSONAL INFORMATION**

We have put in place an internal framework of policies and minimum standards across all our businesses to keep your data safe. In addition, we limit access to personal information by our employees, business partners, service providers and third-party service providers to a 'need-to-know' basis. More specifically and in accordance with the law, we take appropriate technical and organizational measures (policies and procedures, IT security and others) to ensure the confidentiality and integrity of your personal information and the way it is processed.

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- **WHAT ARE YOUR RIGHTS?**

As a global organization, we operate in different jurisdictions which grant individuals different levels of protection in relation to the processing of personal information. We will honor your rights under the applicable law. To the extent provided under your local applicable data protection laws, including the European data protection laws as applicable, your rights may include the following:

- Right of access ('an overview of your personal information'): the right to get an overview of your personal information that we process.
- Right to rectification ('correct your personal information'): if your personal information is inaccurate or incomplete, the right to ask us to rectify or complete your personal information.
- Right to erasure ('right to be forgotten'): the right to request that we delete your personal information to the extent permitted by the applicable law. In certain circumstances, it may not be possible for us to accept your request; for example, when the processing is necessary to comply with a legal obligation, or if the processing is necessary for the performance of a contract. In some cases, your personal information is necessary in order to provide the Services and if you do not provide such information to us then you may be precluded from accessing and using the Services or using certain Services features.
- Right to data portability ('transfer your personal information'): the right to ask us to transfer your personal information directly to you. This applies to certain personal information if processed by automated means and with your consent, or based on a contract you have with us. On your request, and where technically feasible, we will transfer your personal information to another party of your choice.
- Right to restrict processing: the right to request that we restrict or stop the processing of your personal information held by us for a certain period of time, or for an indefinite period. In certain circumstances, it may not be possible for us to accept your request; for example, when the processing is necessary to comply with a legal obligation, or if we can demonstrate compelling legitimate grounds otherwise.
- Right to object: the right to object to the processing of your personal information. The reasons for an objection should relate to your particular situation and be related to processing based on the legitimate interest condition. We will then no longer process the personal information, unless we can demonstrate compelling reasons otherwise. In certain circumstances, you have the unconditional right to object; for instance, in the context of direct marketing activities.
- Withdrawal of Consent: the right to withdraw your consent to the processing of your personal information at any time; for instance, after you consented to us keeping you informed about our Services, you have the right to withdraw this consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing of your personal data prior to the withdrawal.

To exercise your rights (if applicable) and/or for any other questions about the handling of your personal information, we refer you to the '[HOW YOU CAN CONTACT US](#)' section below.

If you feel we are unresponsive or disagree with our data privacy practices, you can also file a complaint with your local Data Protection Authority.

- **THE USE OF COOKIES AND INTEREST BASED ADVERTISING**

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Cookies are small text files, which might be stored on your computer or mobile device. Similar technologies may include pixels, beacons, tags, embedded scripts, social media plugins or other

tracers or similar technologies. These tracking technologies are often used in conjunction with cookies but may be stored in a different manner.

We use cookies and similar tracking technologies (collectively referred to as “Cookies”) for several different purposes, including to optimize our websites, to facilitate website browsing and to analyze website traffic. Cookies may collect information to analyze personal browsing behavior, remember you and your preferences, personalize our Services, and to deliver and measure advertising (including interest-based advertising).

We may use Cookies belonging to one of the four categories listed below.

- Strictly Necessary Cookies - These are necessary for the website to function. They are usually set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, this may have an effect on the proper functioning of (parts of) the site.
- Functional Cookies - These enable the website to provide enhanced functionality, user experience and personalization, and may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly.
- Performance Cookies - these support analytic services that help us to improve our website’s functionality and user experience.
- Advertising Cookies - these can be applied to collect insights, to issue personalized content and advertising on our own and other websites.

If you do not want Cookies to be stored, most modern browsers allow you to select the appropriate options or preferences from the settings in your browser or you may select the appropriate preferences in the cookie-tool(s) provided on some of our websites.

We use the services of third parties, including Google, for our own marketing purposes and to deliver advertising (including interest-based advertising), and these third parties also may use Cookies for these purposes and to track visitors on our websites and elsewhere on the internet. To opt out of Google’s use of Cookies or device identifiers, you can visit Google’s [Ad Settings](#) or by visiting the [Google Marketing Platform opt-out page](#). You may also opt out of certain interest based advertising by visiting the Network Advertising Initiative [opt-out page](#) and the Digital Advertising Alliance [opt-out page](#). We do not maintain or control these opt-out mechanisms, which are provided by non-affiliated third parties. Further, we do not control which third parties choose to participate in these opt-out mechanisms. Please note that opting out of interest-based advertising does not mean that you will no longer see advertising on the services, but these ads may be less relevant to your interests.

- **LINKS TO OTHER WEBSITES**

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Our websites may contain links to other Wolters Kluwer or third-party websites, which may have privacy & cookie notices that differ from ours. We are not responsible for the collection, processing or disclosure of personal information collected through such other websites.

We are also not responsible for any information or content contained on such websites. Links to other websites are provided solely for convenience. Your usage and browsing on any such

website is subject to that website's own policies. Please review the privacy notices posted on other websites that you may access through our website.

Wolters Kluwer may provide you with additional or different privacy notices, in specific instances, on how your personal information is collected and used for a specific Service.

- **HOW YOU CAN CONTACT US**

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If you have any questions about how we process your personal information or if you want to exercise one of your rights, you can contact us at [privacyofficer@wolterskluger.no](mailto:privacyofficer@wolterskluger.no).

If you feel we are unresponsive or disagree with our data privacy practices, you also have a right, depending on applicable law, to file a complaint with your local Data Protection Authority.

In response to a request, we might ask you to verify your identity if needed, and to provide information that helps us to understand your request better. If we do not grant your request, whether in whole or in part, we will explain why.

- **UPDATES TO THIS NOTICE**

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From time to time we may update this Privacy & Cookie Notice or any other specific privacy statement. When making changes to this Privacy & Cookie Notice, we will add a new date to this Privacy Statement. This version is effective as of 2024-03-08.