

PRIVACY POLICY

Privacy Policy

Greenvolt Power Poland Sp. z o.o. ("**Greenvolt Power**" or the "**Company**"), understands that the privacy of all people who relate to it is a basic element of the relationship of trust that it intends to achieve with all its workers, customers, suppliers, and partners.

The protection of Personal Data, as Greenvolt Power's fundamental commitment to its workers, customers, suppliers, and partners, is achieved by Greenvolt Power through strict compliance with all applicable Personal Data protection legislation in force, considering best market practices, and in accordance with the highest ethical standards.

The companies integrating the Greenvolt Power adopt the necessary and convenient mechanisms for the protection of Personal Data and continuously monitor and mitigate the risks that arise in the field of privacy and data protection, thus seeking to ensure the commitment it has made to all its workers, customers, suppliers, and other partners.

1. Purpose

- 1.1. This policy regulates the retention and processing of Personal Data in the context of the employment, contractual or service relationships established between a Data Subject and Greenvolt Power (the "**Policy**").
- 1.2. The processing and retention of Personal Data is carried out in accordance

with the General Data Protection Regulation ("**GDPR**") and other applicable legislation at any time and applies both during the course of the legal and/or contractual relationship with Greenvolt Power, and at the time when the processing of personal data is triggered.

2. Scope

The Policy applies, without prejudice to the specific legal framework of their geographies, to all companies affiliated of Greenvolt Power, subject to the following rules:

- a) in the case of companies wholly dominated by Greenvolt Power, their management bodies shall transpose the local implementation of this Policy.
- b) in the case of companies in which Greenvolt Power exercises control, co-control (Joint Ventures) or Significant Influence (Associates), Greenvolt Power representatives present at the management body shall, by effect of the exercise of control, co- control, or Significant Influence promote the adoption of the measures necessary for the local transposition of this Policy.
- c) in the case of companies in which Greenvolt Power does not exercise significant control or Influence, Greenvolt Power representatives shall comply with the provisions of this Policy in the performance of their duties and, as far as possible, encourage the adoption of rules and procedures consistent with this Policy.

3. Principles

In order to ensure the Company's commitment to privacy, the Policy is based on the following principles:

- (i) The processing of Personal Data has defined intentions, purposes, and scopes, only being collected and processed the necessary data in the context of the conclusion and execution of formalized contracts with workers, customers, suppliers, and partners, in compliance with the legal obligations that are applicable and that at any time may oblige the companies of the Greenvolt Power to process Personal Data.
- (ii) The processing of Personal Data is done according to necessity and proportionality, only being made a) when requested or consented by customers, workers, suppliers, and partners; or b) as a result of the legal obligations to which Greenvolt Power is obliged.
- (iii) All Greenvolt Power customers, workers, suppliers, and partners are informed of the collection and processing of their Personal Data, reason for processing, time of retention and share with third parties.
- (iv) All Data Subjects have control over their Personal Data, and they are guaranteed the broad exercise of their rights, as listed in this Policy. Greenvolt Power companies respond to any questions and requests for information addressed to them by data subjects; and
- (v) Greenvolt Power monitors compliance with the Privacy Policy by Greenvolt Power members and any subcontracted entities and external service providers.

4. Data Subjects

Any individual, natural person, who has a business, contractual or employment relationship with a Greenvolt Power company ("**Data Subject**").

5. Data controller

Greenvolt Power is responsible for collecting and processing Personal Data.

6. Category of Personal Data

Greenvolt Power may collect and process various categories of Personal Data, taking into account the purposes prescribed in Article 7(2) below, namely, but not limited to, the following:

- a. Personal identification data - name, identification document number, etc.
- b. Additional personal identification data and contact details - address, telephone, email, date of birth, profession, employer.
- c. Marital status and household data.
- d. Vehicle registration number.
- e. Data related to complaints or requests for information; and
- f. Data relating to Greenvolt Power's compliance with due diligence duty in compliance with internal policies on the prevention of money laundering and terrorist financing.
- g. Data related to compliance with Greenvolt Power policies.

7. Grounds and Purposes

The following are the grounds and purposes on the basis of which Greenvolt Power may process Personal Data:

7.1. Grounds

- a) Consent: Greenvolt Power may process Personal Data when the Data Subject has provided his express consent (in writing, orally or through the validation

of an option) and prior and if such consent is free, informed, specific, and unequivocal.

- b) Performance of a contract (including pre-contractual due diligence): when the processing of a Data Subject's Personal Data is necessary for the conclusion and execution of a contract concluded between the Data Subject and Greenvolt Power, Greenvolt Power may process Personal Data. In this context, proposals preparation, service delivery, contact management, complaints, billing, collection, and payments are included, without limit;
- c) Compliance with a legal obligation: Greenvolt Power may process Personal Data when it is necessary to comply with a legal obligation to which the Greenvolt Power is subject, such as the communication of data to law enforcement, judicial, tax or regulatory bodies; or
- d) Legitimate interest: Where the processing of Personal Data corresponds to a legitimate interest of Greenvolt Power or third parties, where the reasons for its use must prevail over your rights of the Data Subjects, Personal Data may be processed. This includes purposes such as seeking to improve the quality of the services provided, or, for example, the detection of fraud (which the company considers to be, by their nature, prevail over the rights of data subjects).

7.2. Purposes

In the context of the above grounds personal data may be collected and processed for the following purposes:

- a) Recruitment and employment.
- b) Trainings.
- c) Compliance with contractual or legal obligations.
- d) Promotion of rights arising from an employment relationship.

- e) Marketing.
- f) Institutional communication.
- g) Management of requests, complaints or, in general, response to communications.
- h) Collections.
- i) Litigation.
- j) Security control.

8. Retention of Personal Data

- 8.1. Greenvolt Power is obliged, under the legally applicable terms, to retain personal data collected on the basis of the grounds and purposes listed in Article 7 of this Policy, without prejudice to the data subject's right to opposition or forgetting and, furthermore, in cases where the Data Subject withdraws his consent, where applicable.

9. Security Measures

Greenvolt Power protects Personal Data against unauthorized access to its Personal Data, for this purpose using security systems, rules, and procedures, in order to ensure the protection of Personal Data, including by preventing unauthorized access to it, improper use, disclosure, loss or destruction.

10. Rights of the Data Subject

The Data Subject has the following rights, in accordance with and for the purposes duly regulated by applicable law:

- a. Right of Access:

The right to access and confirm their Personal Data, to know the purposes

underlying the collection and processing of the same and to know the period by which they may be kept.

b. Right of Rectification:

The right to request rectification of Personal Data in cases where it is inaccurate and request its completeness.

c. Right of Restriction:

The right to request that the processing of the respective Personal Data be limited, in particular by being suspended or limited to certain purposes.

d. Right to the Erasure of data:

The right to obtain the deletion of the Personal Data, when there are no grounds that justify the retention of Personal Data.

e. Right to Data Portability:

Right to receive personal data in digital format and to the direct transmission of personal data to another entity that may be the new responsible for the processing of Personal Data, in cases where possible.

f. Right to Withdraw Consent:

Right to withdraw the consent previously provided in relation to the processing of Personal Data at any time.

g. Right to Object:

Right to object to the processing of Personal Data at any time.

h. Right to Complain:

Right to lodge complaints with the national supervisory authority on the protection of Personal Data, the Company.

i. Right to challenge automated decisions:

In cases where the processing of Personal Data is carried out exclusively automatically (i.e., without human intervention), the Data Subject has the

right not to be subject to any decision that is produced as a result of exclusively automated processing, contesting it. To entitle this right, the Data Subject is entitled to human intervention.

11. Sharing Personal Data with third parties

- 11.1. Data Subjects' Personal Data will not be marketed or sold to third parties.
- 11.2. Without prejudice to the preceding paragraph, Personal Data may be shared with third parties where necessary for the purposes of fulfilling contractual, legal, or legitimate interest obligations (unless such interest should not prevail over the interests or fundamental rights and freedoms of employees) of the companies that are part of the Greenvolt Power.

12. Exercise of rights

- 12.1. The exercise of the rights of the Personal Data Subject is free of charge.
- 12.2. The Data Subject may request, in the exercise of his/her rights, the provision of information in writing or orally.
- 12.3. Any requests addressed to Greenvolt Power are answered within a maximum of 30 days, except in cases of especially complex requests.
- 12.4. The correspondence address for the purpose of exercising duties is as follows in this Article is by sending a letter to **Greenvolt Power Poland Sp. z o.o., Al. Wyścigowa 6, 02-681 Warsaw, Poland.**

13. Final provisions

- 13.1. This Policy shall enter into force on the date of its approval by the Management Board of Greenvolt Power.
- 13.2. Any amendment to this Policy shall be approved by the Management Board of Greenvolt Power.

APPENDIX - SETTINGS

1. **"Personal Data"** means any information, of any nature and in any form, relating to an identified or Identifiable Natural Person.
2. **Identifiable Natural Person:** The person who can be identified directly or indirectly, for example by name, identification number, location data, electronic identifier or other elements enabling the identification of that natural person, is considered identifiable.
3. **Company:** means **Greenvolt Power Poland Sp. z o.o.** with registered office in Warsaw, address: Al. Wyścigowa 6, 02 – 681 Warsaw, Poland.