

Registration No.:

PRIVACY POLICY INFORMATION NOTICE

- **PERSONAL DATA OF THE CONTRACTUAL PARTNERS OF INGKA INVESTMENTS RENEWABLE ENERGY ROMANIA S.R.L.**

Document name:	INFORMATION NOTE FOR CONTRACTUAL PARTNERS
Version:	1
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Author:	Legal Department

[The purpose of the Privacy Policy (hereinafter referred to as “Policy”) contained in this notice is to explain to you what data we process, why we process it and what we do with it. Fully aware that your personal information belongs to you, we do our best to store it securely and process it carefully. We do not provide information to third parties without informing you. This information is important. We hope you will read them carefully].

1. WHO IS THE PERSONAL DATA CONTROLLER?

Ingka Investments Renewable Energy Romania S.R.L., with its registered office in Bucharest, Sector 3, Splaiul UNIRII, No. 165, TN OFFICES 3 building, 5th floor, registered with the Trade Register under No. 40/12170/2023, tax code 22160860 (hereinafter referred to as “**Ingka**” or the “**Company**”).

2. TO WHOM DOES THIS POLICY APPLY?

The Company acts as a data controller that may collect and process personal data about you (“**Contract Partner**”), if you are self-employed, and your employees and collaborators (collectively defined as “**Data Subjects**”) in the course of your performance of a contract (“**Contract**”) with the Company.

The data controller shall provide the information mentioned below: **(i)** within a reasonable time after obtaining the personal data, but no later than **one month**, having regard to the specific circumstances in which the personal data are processed; or **(ii)** if the personal data are to be used for communication with the Data Subjects, at the latest at the time of the first communication to the Data Subjects. If the Data Subject or contractual partner has any doubts about this Data Protection Notice or wishes to exercise his or her rights under this Data Protection Notice, he or she may contact the Company at the following e-mail address: dataprotection.renewables.ro@ingka.com

Except as otherwise provided herein, and where applicable, any terms used under this Contractual Partner Privacy Policy shall have the same meaning as given to them in the EU General Data Protection Regulation 2016/679 (“**GDPR**”).

3. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

During the performance of the Contract, the Company collects and processes personal data provided by the Contractual Partner about the Data Subject, such as the employee’s name, surname, e-mail address, telephone number or, only in limited cases, identity data.

If Data Subjects visit wind farms owned by the Company, then other types of personal data (medical information, video images, etc.) will also be collected and will be subject to a separate Information Notice communicated on the occasion of each visit.

4. HOW WE USE YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS?

Personal data will be processed by the company in compliance with applicable laws for the following purposes

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Purpose of Processing	Description of purpose	Legal basis	Category of personal data processed	Consequences of refusing to provide personal data
Contractual purposes	For the performance of the Contract between the Company and the Contractual Partner or to protect the rights of the Company (in particular, there may be instances where the Company may disclose Data Subjects' data if disclosure is necessary to (i) protect, secure or defend the legal rights, privacy, safety or property of the Company, its employees, agents and contractors, (ii) protect the Company against fraud or for risk management purposes	Performance of contractual obligations undertaken by the parties	Surname, first name, telephone number, e-mail, position held in the Company	Refusal to disclose personal data would make it impossible to sign and execute the Contract concluded between the Contractual Partner and the Company
Fulfilment of legal obligations	Compliance with legal and other requirements, such as income tax and national insurance deductions, record-keeping	In order for the Company to comply with certain legal obligations	Surname, first name, telephone number, e-mail, position held in the Company and, in limited	Refusal to disclose personal data would make it impossible to conclude and perform the Contract

Purpose of Processing	Description of purpose	Legal basis	Category of personal data processed	Consequences of refusing to provide personal data
	and reporting obligations, audits, compliance with health and safety requirements		cases, details of identity documents	between the Contractual Partner and the Company.

5. HOW DO WE PROCESS YOUR PERSONAL DATA?

Your personal data are processed both electronically and manually and are protected by appropriate technical and organisational security measures. In this regard, the Company will take appropriate administrative, technical, personnel and physical measures to protect Personal Data that are consistent with applicable privacy and data security laws and regulations, which include in particular protecting Personal Data against misuse or accidental destruction, unlawful or unauthorized access, loss, alteration, disclosure, acquisition or access. This includes requiring service providers to use appropriate measures to protect the confidentiality and security of personal data.

6. WHO CAN HAVE ACCESS TO PERSONAL DATA?

All Company personnel will generally have access to professional contact information such as name, position, phone number, mailing address and e-mail address.

We may disclose personal data, in compliance with applicable law, to business partners or other third parties such as accounting firms, human resources firms, public authorities, etc.

We make reasonable efforts at all times to ensure that these third parties have adequate protection and security measures in place. With these third parties we have contractual clauses or personal data processing contracts so that your data is protected. We will inform you of the identity of these companies prior to transmission or within a reasonable time and ensure that any transfer is legitimate, based on your consent or other legal basis.

For example, we may provide personal data to entities such as IT or telecommunications service providers, accounting, legal services and other third parties with whom we have a contractual relationship. These third parties are selected with great care so that your personal data is processed only for the purposes we indicate.

We may also share personal data with third parties as part of a joint effort to provide a product or service.

Although unlikely, we might sell the business or part of the business in the future, which will include the transfer of personal data.

We may also transmit personal data to other parties with your consent or as instructed by you.

We may also provide personal data to prosecutors, police, courts and other authorized state bodies, based on and within the limits of legal provisions and following specific requests.

We will ensure, within reasonable limits, that personal data does not leave the European Economic Area, but to the extent that we transfer data to non-EEA countries, we will in all cases ensure that transfers are lawful, based on your explicit consent or other lawful basis.

The Company may share personal data for the purposes set out in this Policy with the following categories of entities which may be located inside and outside the European Union as indicated in Section 7 below:

Legal entity	Country	Purpose
<p>Intra-group companies: Ingka Investments Management SRL, Ingka Management B.V., Ikea Services B.V., Ikea Romania S.A., Ingka Investments B.V.</p>	<p>Romania, Sweden, Netherlands, Ireland</p>	<p>The legal entities under this heading, together with the Company, are members of the Ingka Group (Ingka Holding B.V. and the entities it controls).</p> <p>Ingka Investments B.V. provides consultancy services to the Company in order for the Company to develop specialist skills and knowledge and/or to acquire the necessary resources to develop its business.</p> <p>Ingka Investments Management B.V. and Ingka Investments Management S.R.L. provide, on a contractual basis, a range of services necessary for the Company's business: human resources, public relations & communications, finance, fiscal and tax, legal and corporate governance, risk management, compliance, security, digital support, office services.</p>
<p>Professional consultants: accountants, auditors, lawyers, insurers, bankers and other professional consultants</p>	<p>Romania</p>	<p>The company carries out legal, technical and financial-accounting verification and auditing activities or engages services through professional consultants in the context of its business activity (for example: production, sale and supply of electricity, sale of green certificates, management of wind farms and their associated systems).</p> <p>These professional consultants may ask the Company to make available</p>

Legal entity	Country	Purpose
		documents containing your personal data.
Romanian State / Public Authorities	Romania	The Company may be required by law to make personal data available to various authorities, such as: labour inspectorate, environmental authority, tax authorities, ANRE, OPCOM, etc.

A complete list of personal data controllers can be requested from the Company in one of the ways set out in Section 9 of this Policy.

7. IS YOUR PERSONAL DATA TRANSFERRED ABROAD?

The Company may disclose personal data to countries outside the European Economic Area (“EEA”). This disclosure is made to fulfill the purposes described in Section 4 of this Policy. Personal data transferred is described in more detail in Section 3 of this Policy. Please note that we have adopted appropriate safeguards to protect your personal data, regardless of where it is stored. Additional information may be provided by submitting a request to the Company in accordance with Section 9 of this Policy.

8. WHAT ARE YOUR RIGHTS IN RELATION WITH PERSONAL DATA?

If you have questions or concerns about how the Company processes your personal data and if you wish **(i)** to obtain confirmation as to whether or not your personal data exists and to be informed of its content and source, to verify its accuracy and to request its correction or updating, **(ii)** to request the deletion or anonymization of your personal data or to request its restriction or cessation in accordance with applicable law; **(iii)** object to the processing of your personal data in all cases for legitimate reasons, please contact the People & Culture representative.

However, please note that certain personal data may be exempt from such access, correction and deletion requests under applicable data protection or other laws and regulations.

In accordance with the GDPR Regulation, the following applies:

8.1 Retention period

Personal data collected in accordance with this Policy is retained for the duration of the Contract and for an additional **10** years after its termination or last interaction with us.

The aforementioned retention periods will be extended if the retention of personal data is necessary due to litigation, requests by competent authorities or in accordance with applicable laws.

After the end of the period, personal data will be destroyed or deleted from computer systems or rendered anonymous for scientific, historical or statistical research purposes.

In any case, the Company will take steps to ensure that the personal data processed is relevant and not excessive for the intended use and is accurate and complete for the purposes described in this Policy. Accordingly, the Company will retain personal data for the period

necessary to fulfill the purposes set forth in this Policy, unless a longer retention period is required or permitted by law, as described below. After the end of the applicable retention period, the Company will securely destroy or delete the personal data or anonymize it.

8.2 Your rights as a data subject

Your rights under the GDPR Regulation are as follows:

- Right to withdraw the consent
- The right to be informed about the processing of personal data
- Right of access to personal data
- Right to rectify inaccurate or incomplete personal data
- Right to erasure (“right to be forgotten”)
- Right to restrict processing
- Right to transfer personal data we hold about you to another controller
- Right to object to the processing of personal data
- Right not to be subject to a decision based solely on automated processing, including profiling
- Right to take legal action
- Right to complain to a Surveillance Authority.

Please note that:

If you wish to exercise your rights, you may do so by sending a written, signed and dated request to the following e-mail address: [dataprotection.renewables.ro@ingka.com].

- The rights listed above are not absolute. There are exceptions, so each request received will be examined to decide whether it is justified or not. In so far as your request is justified, we will facilitate the exercise of your rights. If the request is unfounded, we will reject it, but we will inform you of the reasons for the refusal and of your rights to lodge a complaint with the Supervisory Authority and to take legal action.
- We will try to respond to the request within 30 days. However, the deadline may be extended depending on various aspects, such as the complexity of the application, the large number of applications received or the impossibility of identifying you within a useful timeframe.
- If, despite our best efforts, we are unable to identify you and you do not provide us with additional information to identify you, we are not obliged to act on your request.

9. QUESTIONS

If you have any questions or concerns about the processing of your information or wish to exercise your legal rights or have any other privacy concerns, you can write to us at the email address below.

The contact details of our Data Protection Officer are:

E-mail dataprotection.renewables.ro@ingka.com

10. UPDATES

The Company may also amend or update this Policy following various interpretations, decisions and opinions relating to the GDPR Regulation. Any changes to this Policy will be notified in advance and will take effect when we publish the revised Policy on the Company's website.

The undersigned, (Surname and First Name of the Data Subject):

[●]

I have received, read and understand the Privacy Policy regarding the collection and processing, use and disclosure of personal data about me as described in this Policy, including personal data about me that is transferred to affiliates and/or suppliers/professional consultants and authorities, and personal data about me that is used and processed there.

Signature:

Date: