

|                              |                              |          |
|------------------------------|------------------------------|----------|
| Original date:<br>30.09.2024 | Authorized by:<br>Management | Doc. No. |
| Revision date:<br>05.01.2026 | Responsible:<br>SBE          | Page 1/3 |

## Policy – Superior Renewables A/S GDPR Policy

### 1 Scope

This policy applies to all employees, contractors, partners, and any other external entities that process personal data on behalf of Superior Renewables A/S. It covers all personal data that we hold, regardless of how it is collected, processed, stored, or destroyed.

### 2 Objective

This policy outlines how Superior Renewables A/S ensures compliance with the General Data Protection Regulation (GDPR). We are committed to protecting the privacy and rights of individuals and ensuring that personal data is collected, processed, stored, and deleted lawfully and transparently.

**References –** Quality system To: ISO 9001

### 4 Definitions

-

### 5 Responsibility

Process owner: QHSE manager

### 6 Description

#### 6.1 Data Protection Principles

We adhere to following principles regarding personal data under GDPR

- **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and transparently.
- **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes only.
- **Data Minimization:** We collect only the data necessary for the purposes it is processed.
- **Accuracy:** Personal data is accurate and kept up to date
- **Storage Limitation:** Data is stored no longer than necessary for its intended purpose
- **Integrity and Confidentiality:** Personal data is processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing.

|                              |                              |          |
|------------------------------|------------------------------|----------|
| Original date:<br>30.09.2024 | Authorized by:<br>Management | Doc. No. |
| Revision date:<br>05.01.2026 | Responsible:<br>SBE          | Page 1/3 |

## 7 Legal basis for processing personal data

7.1 We process personal data based on one of the following lawful grounds:

- Consent from the data subject
- Contractual necessity
- Legal obligation
- Legitimate interests pursued by the company
- Vital interests of the data subject

## 8 Right of DATA Subjects

8.1 Superior Renewables A/S ensures that individuals can exercise their rights under GDPR, which include:

- **Right to Access:** Individuals have the right to request access to their personal data
- **Right to Rectification:** Individuals can request corrections to their personal data.
- **Right to Erasure** ("Right to be Forgotten"): Individuals can request the deletion of their data under specific conditions.
- **Right to Restrict Processing:** Data subjects can request the limitation of processing.
- **Right to Data Portability:** Data subjects can request their data in a structured, commonly used format.
- **Right to Object:** Individuals can object to the processing of their personal data in specific situations.

## 9 Data Collection

We only collect personal data for specific purposes, and we inform individuals how their data will be used at the time of collection. The data we collect includes, but is not limited to,

- Name, address, phone number, and email
- Employment details e.g. certificates, competencies, next of kin etc.
- Financial data

## 10 Data security

We implement appropriate technical and organizational measures to ensure the security of personal data. These include:

- We implement appropriate technical and organizational measures to ensure the security of personal data. These include:
- **Regular System Audits:** Conducting regular audits to detect vulnerabilities.

## 11 Data Retention

Personal data is retained only as long as necessary for the purposes for which it was collected. We regularly review and update our data retention schedules to comply with the GDPR's storage limitation principle.

|                              |                              |          |
|------------------------------|------------------------------|----------|
| Original date:<br>30.09.2024 | Authorized by:<br>Management | Doc. No. |
| Revision date:<br>05.01.2026 | Responsible:<br>SBE          | Page 1/3 |

## 12 Third-Party Data Processors

Where Superior Renewables A/S uses third-party service providers to process personal data, we ensure that they are GDPR compliant. Data processing agreements are in place with all third-party processors, ensuring that they protect personal data in line with GDPR requirements.

## 13 Employee Responsibilities

All employees are responsible for ensuring compliance with this policy. They are required to follow the principles outlined and report any potential data breaches to the Data Protection

## 14 Transparency of GDPR policy

**GDPR statement** that can be placed on your homepage to inform visitors about your compliance with GDPR and how their data is handled:

At **Superior Renewables**, we are committed to protecting your personal data and respecting your privacy in compliance with the **General Data Protection Regulation (GDPR)**. We only collect and process personal data when it is necessary and ensure that your information is handled lawfully, transparently, and securely.

By using our website, you consent to the collection and use of your data as outlined in our **Privacy Policy**. Are you interested to review our policy and to understand how we safeguard your personal information, your rights as a data subject, and how you can exercise those rights, please contact our QHSE Manager at [sbn@superior.dk](mailto:sbn@superior.dk).

## 15 Performance Indicators

-

## 16 Records

-