

## GREENGO ENERGY PRIVACY NOTICE

### 1 Introduction and data controllership

- 1.1 In this privacy notice, you can learn more about how the relevant European GreenGo Energy entities ("we", "us", "our") process personal data in various situations. We provide you with this information as we are required to do so under the General Data Protection Regulation (the "GDPR").
- 1.2 Various Greengo Energy entities acts as data controllers, depending on the processing activity and the specific circumstances. The controllership may rest at (i) GreenGo Energy Group A/S ("GreenGo Energy Group"), (ii) a local Greengo Energy entity ("GreenGo Energy Entity") and/or (iii) a local Greengo Energy project portfolio ("GreenGo Project Portfolio"). Below, under the descriptions of different processing activities, the specific data controllership is described in further details.
- 1.3 Should you have any questions regarding the processing of personal data, please contact [gdpr@greengoenergy.com](mailto:gdpr@greengoenergy.com). Please refer to [Section 14](#) below for further contact details related to GreenGo Energy Group, GreenGo Energy Entity and GreenGo Project Portfolio.

### 2 Various personal data processing activities

- 2.1 We process personal data for different purposes in the following situations:
- When you communicate with a specific GreenGo Energy Entity in relation to general inquiries,
  - When you represent an investor, another business partner or a third party,
  - If you are or represents a landowner,
  - When you sign up to newsletters or participate in events or other marketing activities,
  - If you apply for a position at a GreenGo Energy entity, or
  - When you visit our social media profile(s)

2.2 Below, you can read more about the various purposes of our processing of personal data in different situations, including the controllership, the specific purpose, the legal basis for the processing, and for how long we store the personal data in connection hereto.

### 3 When you communicate with us

3.1 The data controller is GreenGo Energy Group or the specific GreenGo Energy Entity, depending on which entity you communicate with (see [Section 14](#) for contact information).

Purpose	Categories of personal data	Legal basis	Storage
Managing and answering enquiries.	Name and contact information, including email address and phone number, as well as any other information provided by you in the correspondence.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interest in managing enquiries.	Information deriving from communications will be deleted 12 months after the enquiry has been handled/concluded.

### 4 When you represent an investor, another business partner or a third party

4.1 The data controller is the specific GreenGo Energy Entity that is party to the agreement with the investor or the business partner that you represent (see [Section 14](#) for contact information).

Purpose	Categories of personal data	Legal basis	Storage
Business partner (or other third party) administration.	Name and contact information, including email address and phone number, as well as association with a certain investor/company/business partner and any other personal data you may provide us with.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interest in managing contacts and to communicate with you and/or the investor/company/business partner you represent.	Personal data will generally be deleted 3 years after the end of the financial year in which our last contact with the business you represent took place.
Bookkeeping	Information that appears on invoices, such as name, email address and association with a certain company.	We are obligated to store bookkeeping information, including information related to payments/transactions in accordance with	Bookkeeping records will be stored for 5 years after the end of the financial year.

the bookkeeping legislation. The legal basis in this regard is Article 6(1)(c) of the GDPR.

## 5 If you are or represents a landowner

5.1 The data controller is the specific GreenGo Project Portfolio that is party to the contract and/or lease agreement with the landowner as well as the GreenGo Energy Entity located in the country of the GreenGo Project Portfolio (see [Section 14](#) for contact information).

Purpose	Categories of personal data	Legal basis	Storage
Landowner contract and lease administration.	Name and contact information, including email address and phone number, payment information and account numbers, as well as information regarding the land, property account numbers and information on leases.	<p>Article 6(1)(b) of the GDPR, in case you are the party to the contract with the specific GreenGo Project Portfolio and the processing is necessary for the performance of this contract.</p> <p>Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interest in managing landowner contacts and to communicate with you and/or the landowner you represent.</p>	Personal data will generally be deleted 3 years after the end of the financial year in which the contractual relationship with the landowner has ended.
Property registration	Name and contact information, information regarding the land, and information on identification numbers (including Danish CPR-numbers, with regard to local Danish matters, and PESEL numbers for Poland).	<p>Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interest in property registration based on agreement with the landowner.</p> <p><i>For Denmark:</i> Section 11(2) of the Danish Data Protection Act, as we process identification numbers (CPR-numbers) for property registration based on consent from the landowner.</p>	<p>Personal data will generally be deleted 3 years after the end of the financial year in which the contractual relationship with the landowner has ended.</p> <p><i>For Denmark:</i> Information on identification numbers (including Danish CPR-numbers) will be deleted when the property registration at the Danish Land Registration Court has been finalised. See <a href="#">Section 12</a> on how to withdraw your consent.</p>

Bookkeeping	Information that appears on invoices, such as name, email address and information related to the land/property.	We are obligated to store bookkeeping information, including information related to payments/transactions in accordance with the bookkeeping legislation. The legal basis in this regard is Article 6(1)(c) of the GDPR.	Bookkeeping records will be stored for 5 years after the end of the financial year.
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## 6 When you sign up to our newsletters or participate in events or other marketing activities

6.1 The data controller is GreenGo Energy Group.

Purpose	Categories of personal data	Legal basis	Storage
Distribution of our electronic newsletters.	Name and email address.	Article 6(1)(a) of the GDPR, as we ask for your consent when you sign up to our newsletters.	Unless you withdraw your consent, we store the information for as long as you receive the newsletter and up to 2 years after the last newsletter has been distributed to you.  See <a href="#">Section 12</a> on how to withdraw your consent.
Documentation of valid consent	Name and email address.	Article 6(1)(c) of the GDPR, as we are obligated to process such information so we can document our compliance with the Danish Marketing Act.	We store this information for up to 2 years after the last distribution of our newsletter to you.
Registration for participating in events etc.	Name and email address.	Article 6(1)(f) of the GDPR, as we are pursuing our legitimate interest in throwing events, including administrating registrations for the event.	We store this information for up to 2 years after the event or meeting has been conducted.

## 7 If you apply for a position at Greengo Energy

### 7.1 The data controller is GreenGo Energy Group.

Purpose	Categories of personal data	Legal basis	Storage
Receipt of applications and collection of information	As part of the recruitment process, we will receive and process the personal data that you have included in your application, CV and any other material that you may have forwarded along with your application. We may also ask you to send us additional information. The information obtained in this connection will include information about your previous employments, including information related to work assignments, skills, performance and interpersonal skills. We will also obtain other information about you if we consider such information to be necessary for the assessment of your application. If relevant, we will obtain available information published by you on social media, such as LinkedIn and Facebook.	<p>The legal basis for the above processing activities as part of the recruitment process is Article 6(1)(f) of the GDPR, as we pursue the legitimate interest in the processing of the personal data being necessary for our assessment of you as a person and your skills in relation to the contents of the position.</p> <p>If we offer you a position, we will process the personal data necessary for staff administration purposes. In that case, you will receive further information on this. The legal basis for processing the general personal data stated in the application documents may also be 6(1)(b) of the GDPR as it may be necessary to process the personal data in question for the purpose of drafting an employment agreement, if relevant.</p>	<p>If your application is rejected, we will generally delete the information that we have processed about you during the recruitment process when it is completed. This will typically coincide with the time when we enter into an employment agreement with the selected candidate and generally no more than 12 months after the date when you were informed of the rejection.</p> <p>If we employ you, the personal data that we have processed during the recruitment process will, if relevant, be stored in your personnel file in accordance with the applicable retention periods. In that case, you will be further notified of the processing of your personal data.</p>
References	If we wish to obtain information about you from your current or former employer using your references, we will first ask for your approval. Unless you are otherwise specifically notified by us, the information we obtain in that connection will include information about your previous employments, including information relating	See above.	See above.

to work assignments, skills and performance.

Personality tests etc.	During the recruitment process relating to some positions, we may use a personality test and/or a competency test. The purpose of the tests is to identify your personal preferences and skills, forming a basis for a dialogue with you about your personal resources and conduct.	See above.	See above.
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7.2 Mandatory processing of personal data as part of recruitment etc.

7.2.1 Please note that under the GDPR, you are entitled to be informed of whether the provision of personal data is a statutory requirement, or a requirement necessary to enter into a contract, and of whether you are obligated to provide the personal data and of the possible consequences of failure to provide such data.

7.2.2 *For Denmark:* It should be noted in that respect that under the Danish Health Information Act, an employee must state of their own motion or at the employer's request to that effect, whether the employee knows that they suffer from an illness or shows symptoms of an illness which will significantly affect the employee's ability to carry out the work in question.

Further, as a potential future employee, you are subject to the general duty of transfer which means that you must not knowingly withhold information that may be relevant to your opportunity for being employed. Moreover, it should be noted that if you are offered a position, we will use certain personal data about you to draft your employment agreement, including your name and address; see the provisions of the Danish Employment Contracts Act.

If you do not wish to provide the information that you are required to provide under the provisions of the Danish Health Information Act and/or according to your duty of transfer or the information necessary for drafting an employment agreement, or any other information which we are required to collect from you by law, we will be unable to offer you a position.

## **8 When you visit our social media profile(s)**

- 8.1 GreenGo Energy Group has a joint controllership with the social media provider(s) with regard to personal data collected and processed when you interact with our social media accounts. Currently, this comprises LinkedIn. When you visit our LinkedIn profile(s), we and LinkedIn will process personal data as part of "Page Insight" (such as job function, country, industry, seniority, company size, and employment status data from your profile).
- 8.2 As part of the joint controllership arrangement with LinkedIn, LinkedIn has agreed to take responsibility under the GDPR for the provision of Page Insights and will comply with all applicable obligations under the GDPR with respect to its processing of Page Insights. This means that LinkedIn will, among other things, ensure that information is given about the personal data being processed and support right to access and deletion.
- 8.3 You can find a more detailed description of the joint controllership here: [LinkedIn Joint Controller Addendum](#). Further, you can read about the social media providers' own processing of personal data here: [LinkedIn Privacy Policy](#). Also, with regard to third country transfer in this regard, please find further information here: [third country data transfers | LinkedIn](#).

## **9 Recipients**

- 9.1 We use external partners who process personal data on our behalf (data processors). Such external partners include e.g. providers of hosting and technical assistance with regard to our IT systems as well as sending out newsletters.
- 9.2 Further, we disclose personal data to the relevant land registration court in case of property registration related to landowners.
- 9.3 If necessary, e.g., in relation to any disputes or when we otherwise need external advice, we may disclose information to our advisers, including e.g. auditors and lawyers. It depends on the situation what personal data may be disclosed.
- 9.4 Also, we share contact information on investors, business partners or other third parties and landowners between the our group entities (see [Section 10.2](#) and [Section 14](#) below). Further, information on job applicants is disclosed from GreenGo Energy Group to the relevant GreenGo Energy Entity where the position in question is vacant.

## **10 Transfer to third countries**

- 10.1 We may transfer your personal data to our processors located in third countries, including USA. The legal bases for such transfers are either an EU adequacy decision (for USA the [EU-US Data Privacy Framework](#)) or the Commission Decision of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council ("Standard Contractual Clauses").
- 10.2 We may also transfer your personal data to our group entity located in USA (GreenGo Energy US Inc.). The legal basis for such transfer is Standard Contractual Clauses.
- 10.3 If you want additional information about our transfer of personal data to third countries, including a copy of the above-mentioned Standard Contractual Clauses, you may make a request for such additional information by contacting us (see [Section 14](#) below).
- 10.4 With regard to the use of LinkedIn, please see [Section 8.3](#) above.

## **11 Your rights**

- 11.1 In accordance with the GDPR, you have the following rights:
- Right of access: You have the right to have confirmed whether collection or processing your personal data has taken place, and, if so, you have the right to request a copy of your personal data in a digital format.
  - Right of rectification: You have the right to require that we correct any inaccurate personal data, and that we complete incomplete personal data.
  - Right of erasure: In certain circumstances, you have the right to request that we erase personal data concerning you; for example, if it is no longer necessary for the purposes in which it was originally collected.
  - Right to restrict processing: In certain circumstances, you have the right to request that we restrict the processing of your personal data, for example, if you believe that the personal data is not accurate or lawfully processed.
  - Right to object to the processing: In certain circumstances, you have the right to request that we stop processing your personal data.



- Right to data portability: In certain circumstances, you have the right to receive the personal data you have provided us with in a structured, commonly used, machine readable format, and the right to have us transmit the data to another entity, where technically feasible.

11.2 You can read more about your rights in the Danish Data Protection Agency's guidelines on data subjects' rights, which is available at [datatilsynet.dk](http://datatilsynet.dk) (in Danish) and at [datatilsynet.dk](http://datatilsynet.dk) (in English). Please contact us if you wish to exercise any of your rights. The relevant contact details are stated in [Section 14](#) below.

11.3 Please note that there may be conditions or limitations on these rights. It is therefore not certain for example you have the right of data portability in the specific case - this depends on the specific circumstances of the processing activity.

## **12 Your right to withdraw your consent**

12.1 If you no longer wish to receive our newsletters, you can withdraw your consent via the link at the bottom of our newsletters.

12.2 Should we in other situations process your personal data based on your consent, you may withdraw your consent by contacting us. The relevant contact details are stated in [Section 14](#) below.

12.3 If you withdraw your consent, the withdrawal will not affect the lawfulness of processing that has already been carried out based on your consent.

## **13 Complaint to a supervisory authority**

13.1 If you want to lodge a complaint with a supervisory authority about our processing of your personal data, you can do so by contacting the Danish Data Protection Agency via their website, [www.datatilsynet.dk](http://www.datatilsynet.dk), or the local regulators in our other EU jurisdictions (see contact information [here](#)).

## 14 Contact information for the relevant data controllers

### 14.1 GreenGo Energy Group

GreenGo Energy Group A/S  
CVR no. 36049618  
Frydenlundsvej 30  
2950 Vedbæk  
Denmark  
Phone: +45 77 34 85 32

### 14.2 GreenGo Energy Entity:

**Denmark:**

GreenGo Energy A/S  
CVR no. 34884641  
Frydenlundsvej 30  
2950 Vedbæk  
Denmark  
Phone: +45 77 34 85 32  
info@greengoenergy.com

**Sweden:**

GreenGo Energy Sweden AB  
559338-4026  
Nordenskiöldsgatan 11a  
S-211 19 Malmö  
Sweden  
Phone: +46 729 71 54 84  
ggesw@greengoenergy.com

**Poland:**

GreenGo Energy Poland sp. Z o.o.  
VAT no. 5272997458  
ul. Towarowa 28  
PL-00-839 Warsaw  
Poland  
ggepl@greengoenergy.com

### 14.3 GreenGo Project Portfolio:

You can find the identity and contact details of the relevant GreenGo Project Portfolio in the contract and/or lease agreement that has been concluded between either you as landowner or the landowner that you represent.



**15 Trademarks etc.**

15.1 GreenGo Energy's trademarks, including "greengo energy", are registered trademarks of GreenGo Energy Group. GreenGo Energy's trademarks and logos are solely to be used by GreenGo Energy and its affiliates. All content contained on this site (<https://www.greengoenergy.com/>), such as text, graphics, logos, photos and other material, is the sole property of GreenGo Energy Group and protected by copyright law and other applicable legislation. All rights reserved.

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