

PRIVACY POLICY - DENMARK

Employees

1 INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

Your data security is important to us, and we therefore take great care to ensure that your personal data is handled responsibly. Below you can read how Solar A/S (hereinafter “Company”, “we”, “us” or “our”) process personal data about you when we act as data controller. You can also read about your rights in relation to our processing.

This Privacy Policy applies to all employees and former employees (“Employees”) of the Company.

Each Country Head is responsible for compliance with this Privacy Policy in his or her country and for informing his or her Employees about this Privacy Policy. In addition, each Employee in the Company is responsible for ensuring that his or her actions are compliant with this Privacy Policy.

2 COMPANY’S ROLE AS A DATA CONTROLLER

The Company processes data about its Employees in particular when handling employment relationship matters, but also in respect to the Company’s suppliers, partners and other third parties. In connection with your employment with us, we collect, receive and process certain personal data about you. We use the data for the purposes described in this Privacy Policy. We are data controllers for the personal data that we process about Employees.

The purpose of this Privacy Policy is to inform our Employees about the Company’s processing of personal data.

If you have any questions regarding our processing of your personal data, please contact the Company. You can find contact information about the Company here:

Solar A/S
CVR no. 15908416
Industrivej Vest 43, 6600 Vejen
Denmark

Contact person:
Name: Jesper Kjær Nygaard
Phone: +45 79 30 00 00
Email: gdpr@solar.dk

3 DEFINITIONS AND EXPLANATIONS

Capitalized terms used in this Privacy Policy, including any appendix and/or other documents attached to or otherwise made a part of this Policy, shall have the meanings ascribed to them in this section. All defined terms include the plural as well as the singular.

“**Company**” is defined in the section ‘Information about the processing of personal data’.

“**Data controller**” means the natural or legal person, authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

“**Country Head**” shall be understood as a MD/SVP who heads a country in the Solar Group of Companies.

“**Data subject**” means an identified or identifiable natural person.

“**Employee(s)**” means an employee working in the Company and former employee of the Company.

“**GDPR**” means REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

“FDPA” means the Faroe Islands Act no. 80 on the 7. June 2020 on the protection of personal data (Data Protection Act).

“GDPR Group Team” means a governing body managed by Solar A/S’ board of directors. Representatives of GDPR Group Team can always be found at the Company’s Intra on the GDPR site.

“GDPR Responsible” means the responsible person appointed from each subsidiary of Solar A/S.

“Solar Group of Companies” means the group of companies/subsidiaries owned and/or controlled by Solar A/S, which is the parent company of the Solar Group of Companies.

“Privacy Policy” means this Privacy Policy with document no.: GP 01.02.

“Personal data” means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular, but not restricted to) by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Third party” means a natural or legal person, public authority, agency or body other than the data subject, data controller, data processor and persons who, under the direct authority of the data controller or data processor, are authorized to process personal data.

“Data processor” means a natural or legal person, public authority, agency or body which process personal data on behalf of the data controller.

4 INFORMATION THAT WE COLLECTED DURING THE RECRUITMENT PROCESS

The purpose of collecting personal data about you during the recruitment process was to determine if you were a qualified candidate for the position for which you have been employed. We will retain your personal data from the recruitment process as part of your Employee portfolio in order to document your employment history.

In connection with the recruitment process we have collected and registered the personal data that appears from your application, your CV, and other documents you have submitted. Furthermore, we may have collected and registered information which you have provided during job interviews, and which we have obtained from any references.

We can process the following information: Name, address, date of birth, gender, phone number, email address, national identification number (CPR-nummer), education(s), professional qualifications, career history, language qualifications and other relevant qualifications and written recommendations/references.

Our legal basis for processing is performance of the employment contract with you, cf. Article 6(1)(b) and/or our legal obligations, cf. Article 6(1)(c), e.g. in relation to the obligation to report salary. We can also use our legitimate interests in Article 6(1)(f) of the GDPR when the processing is necessary to manage the employment relationship, e.g. information related to education, employee benefits and administration of employment relationship. We may also, depending on the circumstances, use Article 6(1)(a) or Article (9)(2)(a).

For the processing of information about your civil registration number (CPR-nummer) we use Section 11(2)(1) or (3), cf. Section 7(2), of the Danish Data Protection Act as the basis for processing.

Diversity at the Company

We can also register information about your gender and citizenship. It is optional, whether you want to provide that information. We process such information in order to comply with our diversity policy to seek diversity at the Company. Our legal basis for processing is our legitimate interests in complying with diversity requirements and preserving a culture of diversity, cf. Article 6(1)(f).

4.1 Information from social media

If we did a search on social media, e.g. LinkedIn, Facebook, Instagram and Twitter, during the recruitment process, we may keep this information during your employment.

We use Article 6(1)(f) and/or Article 9(2)(e) of the GDPR as the legal basis for processing such information. We may also use Section 8(3) of the Danish Data Protection Act as the legal basis for processing. We may keep this information in order to document your employment history.

4.2 Information from test assessments

If you have completed a test assessment and/or a logical test during the recruitment process, we may keep the results of such test during your employment period. We may also, at a later time, invite you to take a new test assessment and/or a new logical test. We can also invite you to participate in team building tests, engagement survey and test assessments during your employment.

We use Article 6(1)(f) of the GDPR as the legal basis for processing as it is necessary for us to assess whether you are the right candidate for the position. We may also, depending on the circumstances, use Article 6(1)(a) and Article (9)(2)(a) of the GDPR. If so, you will be asked to give your consent before such test is made.

We will process this information in order to determine whether your skills and qualifications match the company's profile and the specific position for which you applied, and in connection with subsequent employee development and to document your employment history.

4.3 Information from former employers

If we have obtained information from one or several of your former employers on the basis of your consent, we have registered such information. We delete such information after 6 months.

We use your consent, cf. Article 6(1)(a) of the GDPR as the legal basis for processing as we have collected this information with your consent. The subsequent storage of information is based on Article 6(1)(f) of the GDPR in order to document your employment history.

5 INFORMATION THAT WE RECEIVE DURING YOUR EMPLOYMENT

During your employment, we receive different kinds of information about you. We will process this information in order to ensure that we comply with our obligations towards you pursuant to the employment contract, any collective agreement in force and the legislation that we are subject to.

You can read more about the purpose and the legal basis for processing of each type of information below.

5.1 Master data etc.

In connection with your employment, we will process information about you in order to comply with our obligations towards you in accordance with your employment contract.

Such information can include:

- Master data (e.g., name, address, birth data, job title, private e-mail address, phone number, bank details, etc.)
- Educational information (including relevant diplomas and information regarding continuing education etc.)
- Salary information (information on salary, working hours, payslip bonus schemes and other employee schemes and benefits)
- Evaluation of work performance
- Registration of sickness absence, information regarding leave of absence and holidays

We use Article 6(1)(b) and 6(1)(f) of the GDPR as the legal basis for processing this information, as such personal data is necessary to process in order for us to comply with our obligations towards you pursuant to the employment

contract and to serve our legitimate interests in administration of the employment. We may also use Article 6(1)(c) of the GDPR as the legal basis for processing in situations where processing is required in order to comply with a legal obligation to which we are subject.

In connection with our payment of salary, we will process your national identification number (CPR-nummer) when we disclose information to the Danish Tax Authorities (SKAT) for tax deduction purposes. We will process this information in accordance with Section 11(2)(1) of the Danish Data Protection Act, as such processing is required in order to comply with our obligations pursuant to tax legislation.

5.2 Health information

In connection with absence due to illness during your employment, it may be relevant to obtain medical records, including fitness for work statements, and to conduct sickness absence conversations pursuant to legislation in force or to obtain material from your municipality of residence in connection with obtaining sickness benefits. In these situations, and in case of maternity/paternity leave or industrial injuries, we may receive and register health information about you.

We will process health information pursuant to Sections 7 and 12 of the Danish Data Protection Act and Article 9(2)(b), cf. Article 6(1)(c), of the GDPR.

For the processing of information about your national identification number (CPR-nummer) we Section 11(2)(1) or (3), cf. Section 7(2), of the Danish Data Protection Act as the legal basis for processing.

5.3 Information concerning children

In connection with your employment, we will process information about the number of children you have and how old they are. We do that in case it is necessary to determine whether you are entitled to childcare days and other types of absence related to children, and whether you are entitled to the child's first sick day.

We will process this information in accordance with Article 6(1)(b) of the General Data Protection and Section 12 of the Danish Data Protection Act as this is personal data that we need to process in order for us to comply with your employment contract and our obligations as an employer.

5.4 Information concerning your nearest relatives

If you have provided us with information concerning your nearest relatives, we may register the contact information for such person(s). Our processing of information about your nearest relatives will only be used for the purpose of contacting them in case of accidents, sudden illness etc., in the workplace.

We use Article 6(1)(f) of the GDPR as the legal basis for processing this information in order to safeguard your legitimate interests in your nearest relatives being contacted in case of accidents or sudden illness at your workplace. We may also use Article 6(1)(c) of the General Data Protection Regulation as the legal basis for processing in situations where processing is required in order to comply with a legal obligation to which we are subject.

5.5 Reprimands, warnings, etc.

If, during your employment, we receive any complaints about you, or if you receive any oral or written reprimands or warnings from us, we will store information about this.

We use the performance of employment contract, cf. Article 6(1)(b) and/or our legitimate interests, cf. Article 6(1)(f) of the GDPR as the legal basis for processing. We process this information in order to document your employment history, as this may affect your future employment with us and our legal position in case of subsequent employment law disputes.

5.6 Payment of disbursements and reimbursements

For the purpose of receiving mileage allowance and obtaining reimbursement of disbursements etc., mileage and disbursements may be recorded by the Employee or the Company, the Company may process information on routes, start and stop locations, purpose and number of kilometres driven. In addition, information about disbursements is processed, including images of receipts, purchase amount and purpose of the disbursement.

We use Article 6(1)(b) of the GDPR as the legal basis for processing this information, as such personal data is necessary to process in order for us to comply with our obligations towards you pursuant to the employment contract. We may also use Article 6(1)(c) of the GDPR as the legal basis for processing in situations where processing is required in order to comply with a legal obligation to which we are subject.

5.7 Information regarding control measures

In connection with our use of control measures, we may register information about you.

5.7.1 Driver's license

For Employees who drive in the Company's cars, it is required that the Employees have a valid driver's license. We may from time to time control if relevant Employees who drive in the Company's cars have a valid driver's licence. The controls are carried out by random sampling. The purpose of the control of your driver's license is a matter of security in order to protect our business.

We use Article 6 (1)(f) of the GDPR as the legal basis for processing, as it is necessary for us to process this information as part of the security measures that we implement in order to protect our business.

5.7.2 Camera surveillance

Our locations are monitored with camera surveillance, for the purpose of supervision and to prevent burglaries, loss and unauthorised access to our premises. In addition, the recordings may be used as documentation in connection with personnel matters regarding e.g. sexual harassment or theft in the workplace.

If you are present at one of the locations with camera surveillance, we will process the recordings of your activities in the areas with camera surveillance. We will also process information about the time when you are present in these areas.

We have put up signs in areas with camera surveillance. Camera surveillance recordings will be deleted after 30 days, unless a longer period of storage is specifically required.

We use Article 6(1)(f) of the GDPR as the legal basis for processing, as it is necessary for us to process this information as part of the security measures that we implement in order to protect our business, including for the purpose of supervision and to prevent burglaries, loss and unauthorised access and for the purpose of providing documentation in personnel files. We only use it under special circumstances such as specific suspicion of and thereafter determined theft.

Specific for Employees at the department "Data & Sikring"

When you are an Employee of Data & Sikring, which is a part of Solar A/S, Data & Sikring process personal data about selected Employees in connection with testing and demonstration of the camera surveillance equipment.

The purpose of the processing is to test and demonstrate the system and in relation thereof, to be able to show the equipment and functions to the customers.

The legal basis for processing is our legitimate interests in testing and demonstrating the camera surveillance systems, cf. Article 6(1)(f) of the GDPR.

5.7.3 Logging

In order to protect our business, we log our Employees' use of the Internet and back up Employees' work-email accounts. Your Internet history and/or your email account may be reviewed by us in case of suspicion of use in violation of our internal guidelines and policies, or in case of suspicion of use in violation of legislation in general.

We use Article 6(1)(f) of the GDPR as the legal basis for processing, as it is necessary for us to process such information as part of the security measures we implement in order to protect our business, including to be able to monitor your use of the Internet and work-emails in connection with a specific suspicion of misuse.

5.7.4 Statistics

We can also log and keep statistics on calls made to the service desk. In this context, we may also process information about Employees contained in customer reviews.

We use Article 6 (1)(f) of the GDPR as the legal basis for processing, as it is necessary for us to process this information as part of the ongoing quality and control measures for the purpose of servicing our customers.

5.7.5 Administration of work phone

On all company phones and tablets, an application must be installed to ensure that applications used for company purposes cannot interact with your other applications. The application ensures that Facebook, for example, cannot retrieve confidential information from your company email.

When installing the application, some of your settings on your phone may also be changed - this is purely to increase security in case your phone ends up in the wrong hands.

The application does not allow the Company to view your emails, text messages, pictures or similar, but only allows to manage your settings and the installation of new company applications.

We use Article 6 (1)(f) of the GDPR as the legal basis for processing, as it is necessary for us to process such information as part of the security measures we have implemented in our business.

5.8 Solar Family

It is possible for Employees to apply through a fund called Solar Family. In connection with your application and payment of funds from Solar Family, the Company will process information about you, including your name, national identification number (CPR-nummer), address, email-address, and account details.

The purpose of the processing of the personal data is administration and payment of funds from Solar Family.

We use Article 6 (1)(f) of the GDPR as the legal basis for processing, as it is necessary to process such information in order to administrate and handle Solar Family.

5.9 Use of photos and videos

For internal use

Photos of you will be used on, as an example:

- ID cards
- The intranet
- Your email account
- Phone
- Teams
- HR Management Systems

We use Article 6(1)(f) of the GDPR as the legal basis for processing this information to ensure that your colleagues are able to identify you.

Furthermore, the Company will use photos and videos from company events where you may appear, for instance on our intranet in the period after an event. We use Article 6(1)(f) of the GDPR as the legal basis for processing based on our legitimate interest in being able to document the company's history.

For external use

In certain situations, we will use photos of our Employees on our website(s) in order to allow our customers and cooperation partners to identify and contact our Employees. If this is relevant to you, we will obtain your consent before using your photo and publishing it on the Internet. We use Article 6(1)(a) of the GDPR as the legal basis for the processing.

A few Employees appear on photos and/or videos on our social media accounts like Facebook, LinkedIn, Instagram etc. We may also want to use photos of our Employees in other marketing contexts.

If this is relevant to you, we will obtain your consent before using your photo and publishing it on the Internet. We use Article 6(1)(a) of the GDPR as the legal basis for the processing. If you have given your consent, you can always withdraw the consent at any time without any direct or indirect repercussions.

5.10 Trade union membership

In order to comply with our obligations pursuant to the collective agreement which you or the company is comprised by, or relevant employment law, it may be necessary to process information about your trade union membership, if any. This will, among others, be the case if the company deducts trade union contribution from your salary, if we pay sick pay pursuant to a collective agreement, or if we are to determine whether you are entitled to compensation or otherwise pursuant to the collective agreement or any other relevant employment law.

We process information concerning your trade union membership pursuant to Section 7(2) and 12 of the Danish Data Protection Act and Article 9(2)(b) of the GDPR.

5.11 Whistleblower scheme

In connection with our whistleblower scheme, we may process personal data about you if you report a situation, or if you are reported via the whistleblower scheme. The whistleblower scheme allows our Employees anonymously to report a situation that is contrary to - or potentially contrary to - current legislation and rules. All categories of personal data may be processed under our whistleblower scheme.

We use Article 6(1)(c), Article 6(1)(f), Article (9)(2)(b) of the GDPR and Section 8(3) and (5), cf. Section 7(1), of the Danish Data Protection Act to process personal data reported via the whistleblower scheme.

We will process this information in order to protect our and our Employees' vital interests, and in order to ensure effective and secure operation of our business. This information may also affect the Company's legal position in case of subsequent disputes.

You can read more about our whistleblower portal here:

<https://solar.whistleblownetwork.net/FrontPages/Default.aspx>.

5.12 Termination of employment

If your employment is terminated, we will register the reason for such termination.

We use Article 6(1)(f) of the GDPR as the legal basis for processing based on our legitimate interests in being able to document your employment history, as it may be relevant for the company's legal position in case of subsequent disputes related to employment law.

6 STORAGE AND ERASURE

The personal data shall be deleted when it is no longer necessary to keep the data. These periods may vary and are to be specified for the specific purposes and may vary based on national law establishing how long we shall keep the information. Unless local legislation requires otherwise data will be deleted 5 years after the person has left the Company.

In special circumstances, we may store this information for a longer period, e.g. in case of industrial injuries or in connection with a subsequent employment law dispute.

7 RECIPIENTS OF DATA

As part of the Company's personnel administration, the Company is from time to time required to disclose personal data to third parties.

It may for instance be necessary to disclose information about you to the following recipients:

- Payroll providers
- Tax Authorities
- The national Occupational Injury Agency (in case of accidents at work)
- Pension & insurance providers
- Banks
- Teachers for the purpose of providing continuing education
- Other public authorities to whom the Company is required by law to disclose personal data.

We will not disclose your personal data to other recipients unless required.

We try to limit the disclosure of personally identifiable information and thus the disclosure of information that can be attributed to you personally.

The Company also discloses your personal data to data processors. Our data processors only process your personal data for our purposes and under our instructions. We enter into written data processing agreements with our data processors.

8 TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

In connection with our processing of your personal data we may transfer such information to countries outside the EU/EEA.

The data protection legislation in these countries may be less strict than the legislation applying in Denmark and other parts of the EU/EEA. However, in some countries, the EU Commission has determined that the level of data protection is equivalent to the level of protection in the EU/EEA.

If we transfer personal data to countries where this is not the case, the transfer of your personal data to these countries outside the EU/EEA will take place on the basis of the Standard Contractual Clauses drawn up by the European Commission and specifically designed to ensure an adequate level of protection. We assess the adequacy of the transfer basis and adopt additional measures if necessary to ensure an adequate level of protection for the transfer.

You can read more about the transfer of personal data to countries outside the EU/EEA on the European Commission's website.

If you would like further information about our transfer of personal data to countries outside the EU/EEA, please contact us.

9 YOUR RIGHTS

As a data subject, you have certain rights under the GDPR. If you want to exercise your rights, please contact us.

You may - unconditionally and at any time - withdraw your consent. You can do so by sending us an email (see email above). Withdrawal of your consent will not have any negative impact. However, this may mean that we cannot meet specific requests from you in the future. Withdrawal of your consent will not affect the lawfulness of the processing based on consent before it is withdrawn. Furthermore, it will not affect any processing carried out on another lawful basis.

You can also - unconditionally and at any time - object to our processing when it is based on our legitimate interests.

Employees have the following rights:

- ***Right of information and access:*** You have the right to receive information regarding if personal data about you is being processed and in such case, you have the right to access the personal data we process about you.
- ***Right to rectification:*** You have the right to obtain rectification of any inaccurate and incomplete personal data about you.
- ***Right to erasure (right to be forgotten):*** In some cases, you have the right to obtain erasure of information about you before the time when we would normally delete your data. This is in case in the following situations: i) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed, ii) you have withdrawn your consent on which the processing is based and there is no other legal ground for the processing, iii) you have objected to the processing and there are no overriding legitimate grounds for the processing, iv) you have objected to the processing of your data for direct marketing purposes, v) the data has been processed unlawfully.
- ***Right to restriction of processing:*** In certain situations, you have the right to obtain restriction of the processing of your personal data. This is the case e.g. where you have contested the accuracy of the personal data and you have demanded correction. When the matter is being investigated you can also demand restriction of the personal data. If you have the right to restrict the processing of your personal data, we may only process personal data in the future - apart from storage - with your consent, or for the establishment, exercise or defence of legal claims, or to protect an individual or important public interests.
- ***Right to object:*** In certain situations, where we process your personal data on the legal basis legitimate interest, you have the right to object to our processing of your personal data, and always if the processing is for direct marketing purposes. If we cannot prove that our interest weighs heavier than your interest of having your personal data protected we will cease with the processing.
- ***Right to data portability:*** In certain situations, where you have provided your consent to the processing of personal data or if we process your personal data based on the legal basis fulfilment of contract, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to have such personal data transferred from one data controller to another if possible from a technical point of view.
- ***Right to lodge a complaint:*** You can lodge a complaint at any time with the competent supervisory authority about our processing of personal data. In Denmark it is the Danish Authority for Privacy Protection (Datatilsynet). See more at <https://www.datatilsynet.dk/> where you can also find further information on your rights as a data subject.
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10 APPROVAL - AMENDMENTS AND EXCEPTIONS

This Privacy Policy is approved by Group VP, HR.

Amendments and Changes to this Policy are only to be carried out if approved by the SVP, CFO in collaboration with the Chief Executive Officer.