

# **Privacy Policy**

In this privacy policy you can read more about the policies for how we process personal data about users of our services on the website, our customers, and partners.

#### Preamble

ProCon has prepared this privacy policy to ensure compliance with applicable legislation, including the EU regulation on personal data (hereinafter referred to as "GDPR") and the Danish Data Protection Act.

This policy is part of ProCon's overall documentation for the company's compliance with the applicable personal data legislation.

The privacy policy describes how we process personal data about users of our services on the website, our customers, and other partners, about which we handle personal data as part of our business for the fulfillment of other purposes.

In addition, reference is made to our <u>Cookie Policy</u>, which applies to the collection of personal data regarding the use of the websites www.proconas.dk and www.procon.as with subpages.

#### 1. Controller

ProCon Group A/S is the data controller for the collected personal data about customers and business relationships. Below you will find relevant contact information:

ProCon Group ApS / ProCon Wind Energy A/S Ankeret 5B, st. th., 9220 Aalborg, Denmark

Wind Energy VAT no. DK40107533

Tel.: +45 41 52 53 00 Email: mail@procon.as

## 2. Processing of personal data

ProCon processes all personal data in a confidential, secure, and responsible manner. Any processing of personal data refers to the principles of legality, fairness, and transparency. Personal data are solely collected for explicit and legit purposes. We strive to ensure that all data are correct and updated, and that the principles of storage limitation, integrity, confidentiality, and responsibility are in focus.

The purpose for processing your personal data will mainly be to respond to your inquiry or to be able to fulfill the agreement or collaboration that you, or the company you are employed in, has entered with us. In some cases, the purpose may also be the balancing of interests. This is because the processing of your personal data is significant for us to be able to comply with the obligations incumbent on us as a company.



In addition, we process personal data to comply with a legal obligation, including to comply with Data Protection Legislation and the Danish Accounting Act.

The personal data legislation does not contain provisions about when personal data must be deleted. This must be decided by us as the data controller in the individual situation. In assessing this, particular emphasis is placed on whether a continued processing of personal data serves an objective purpose, or whether we are obliged by law to store certain information or documents.

## 2.1. Visit on website

When you visit our website, fill out our contact form, or the like, as part of a possible communication, buying and selling process, we collect the personal and company information that you provide us e.g. name, company, VAT no., address or contact details to be able to handle your request in the best possible way. We may also save the personal information in our CRM (Customer Relationship Management) system to ease any new requests from you in the future.

Furthermore, when you browse the website, we also collect data about your conduct on the website to customize and improve our website content and enhance the user experience. The data may also be used to increase the value of our online ads.

We automatically receive your computer's IP (internet protocol) address to provide us with data that helps us determine e.g., things about the specific type of browser and operating system which is used. If you do not want this data to be collected, you should delete the cookies in your browser and refrain from further use of the website. However, this may affect your user experience. For more information, please read our Cookie Policy.

We will only send you marketing emails about our business's new solutions and other updates with your prior explicit permission.

#### 2.2. Receipt of inquiries

When you contact us over the phone, mail, website, or social media, we collect and treat the personal data which is apparent from your inquiry. If you, for example, contact us over LinkedIn, we will receive certain information about you in terms of your name, job situation, and picture. We will, as far as possible, reply to your inquiry on the same media which you have contacted us through.

When you contact us over the phone, we will note your name and the purpose of your contact if relevant. We do this to enable the possibility to follow up on your contact and to document the inquiries we get from our customers. You therefore need to be aware that we in some cases note the relevant information you provide over the phone into our system.

At ProCon, we usually register a contact person for the customers, partners, and suppliers, which we have business-related dialogue. We typically register the person's name, title, email, and phone number. Furthermore, we might log notes from customer and partner talks, which is why contact details, agreements, and requirements may be saved in our system as well. However, no sensitive personal data is registered as the purpose of the collected information is to handle the incoming agreement.



We always keep your inquiry until it has been processed. If your inquiry results in a business relationship, you will then be considered as a partner, e.g., customer or supplier, and the deletion of your data, therefore, follows our usual procedure for handling cases with customers or partners (see below).

# 2.3. Handling information about participants at events

When ProCon is a host of an event or visit, where enrolment is required, we treat the personal data of the participants in terms of their names, job situations, phone number and email. We do this to handle the registrations to the event or visit, and in some cases to invite to similar events later.

To evaluate who is participating in events and to improve the content of the events, if we later offer the same event again, we basically keep registration lists for 12 months from the time the event was held. In some cases, we also keep the information to invite you to similar events later.

If you participate in an event or visit, you need to be aware that we in some cases will take mood pictures and share them on our website and/or on our social media. The purpose of this is to brand the events/visits we arrange as well as ProCon, the company. If you do not wish to be in such pictures, you must make us aware of this before the start of the event/visit.

# 2.4. Handling of customer- and partner information

When you, or the company you work for, is a customer, supplier, or other partner to ProCon, this results in that we process some personal data about you. This is to administer the agreement we have with you, to be able to invoice the services, and to be able to send you relevant information related to the agreement.

Personal data about customers and partners are stored in our CRM (Customer Relationship Management) system. When we register you in this system, we register your name, job position, company, business address, email, and phone number.

All relevant project-related information, including your personal data, is processed for 10 years from the end of the customer or business relationship. However, we do not delete personal data, if it is necessary to establish or defend a legal claim, e.g., if a dispute arises due to financial outstanding issues between you or the company you work for and ProCon. This means that we store the information for longer than 10 years.

Further, accounting records are processed for 5 years to comply with the Accounting Act.

## 3. Consent and withdrawal

When you provide us with personal data in a communication, buying or selling process, we imply that you provide us with your consent to process your data and use it for that specific reason, only.

If we ask for your personal data for a secondary reason e.g. marketing, we will either ask you explicitly for your expressed consent or provide you with an option to say no.

If the processing of your personal data is based on your consent, you can withdraw your consent at any time by contacting us on the above-mentioned contact information. We then stop the processing of the personal data to which the consent relates if there is no other legal basis for processing the personal data. Your withdrawal does not affect the legality of the treatment that was carried out before you withdrew your consent.



# 4. Disclosure of personal data

We will not disclosure your personal data to third parties unless we have a legal basis. This may e.g. be based on your consent or because we are obliged to do so pursuant to applicable law, or because it is necessary to be able to establish or defend a legal claim. If you for example are a customer to us, it may be necessary to pass on personal information about you to public authorities, insurance companies, advisers, accountants, courts, etc.

Disclosure of your personal data for other purposes will only happen if you consent to it.

# 5. Third-party data processors

We use third-party data processors for the storage and processing of data. These third-party data processors solely process the data on our behalf and may not use the information for their own purpose. This is secured with a third-party data processing agreement.

We only use data processors in the EU that can provide your data with sufficient protection.

#### 6. Security

We have adopted technical and organizational precautions and follow industry best practices to ensure our processing of personal data against illegally published, inappropriately lost, misused, disclosed, altered, destroyed, unauthorized accessed, or otherwise processed in violation of the law.

This means that we have implemented physical and technical measures in the form of access control, passwords, ongoing back up of data, etc. We have prepared internal guidelines for processing personal data regarding information and IT security, and our employees are instructed on how they may process personal data and what to do in the event of a breach of personal data security.

## 9. Storage of personal data

We only store and process your personal data for as long as is necessary in relation to the stated purpose of the processing. In some cases, there is a statutory obligation for how long the information must be stored. In those cases, a decision has thus been made by law as to how long there is a purpose for storing and processing the data.

When the purpose of the processing is no longer present, and we do not have a statutory obligation to process the personal data, the data will be deleted.

## 10. Your rights as data subject

According to the Personal Data legislation, you have several rights in relation to ProCon's processing of information about you.

In relation to our treatment of your data, you have several rights:

- The right to gain insight into your personal data



- The right to get incorrect personal data changed
- The right to request that your personal data is deleted
- The right to refuse that your personal data is used for direct marketing
- The right to object against automatic, individual decisions, including profiling.
- The right to get your personal data handed out in a readable document (in some cases)
- The right to complain about our handling of your personal data to Datatilsynet in Denmark.

You can read more about your rights in the Danish Data Protection Agency's guide on the rights of data subjects, which you can find at <a href="https://www.datatilsynet.dk">www.datatilsynet.dk</a>.

# 10. Changes to this privacy policy

This privacy policy is version 1.2 and is valid from 1st June 2023.

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately.

If our company is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to offer our services and products to you.

#### 11. Contact information

If you would like to access, correct, amend or delete any personal information that we have about you, or want to register a complaint, or just want more information, please contact us at mail@procon.as or tel. +45 41525300.

You also have the possibility to lodge a complaint about our treatment of your personal data to the Danish Data Protection Agency.