

# **PRIVACY POLICY**

For visiting website, business relations, events, etc.

#### 1. INTRODUCTION

1.1 When you visit Norlys Energy Trading A/S' ("NET", "we", "us", or "our") website, correspond with us as a business relation, participate in our events, etc., we process personal data about you. This privacy policy explains how NET processes your personal data in relation to these situations.

#### 2. THE DATA CONTROLLER AND CONTACT INFORMATION

2.1 The data controller for the processing of personal data is:

Norlys Energy Trading A/S CVR-no. 41419849 Over Bækken 6 9000 Aalborg Denmark

Contact information:

compliance@norlysenergytrading.com



# 3. DESCRIPTION OF THE PROCESSING

Task and purpose of processing	Categories of personal data	Sources	Legal basis for the processing	Recipients	Data retention
Visiting our website  We process technical data necessary to ensure the website's functionality.	We process the following categories of personal data:  Ordinary personal data:  Browser version, operating system from the device, device type, country, and region.	We collect personal data from the following sources:  • Directly from the data subject	The processing is based on our legitimate interest in operating the basic functions of a website. Necessary cookies ensure that the website is operational and useful for our website visitors.  Necessary cookies activate the basic functionality of the website and it is therefore not possible to reject the processing of necessary cookies. The processing of the necessary cookies exceeds the interests of the data subject as the website would not work without the necessary cookies, cf. GDPR art. 6(1)(f).	We share personal data with our suppliers, including IT- and support suppliers, which assist us.  Such sharing namely takes place with our cookie provider/web analytics.	For information about storage periods, please see the cookie banner.
Administration of business relationships	We will process the following categories of personal data:  Ordinary personal data:  Name, email address, telephone number, position and workplace	We collect personal data from the following sources:  Directly from the data subject  Public sources	The processing of personal data is based on our legitimate interest in being able to identify and communicate with the contact person.	We share personal data with our suppliers, including IT- and support suppliers, which assist us.  In addition, we may disclose personal data to our group companies and to public authorities to	We store personal data re- lated to business relations as long as we have a busi- ness relationship with the company and for up to five years after the end of the calender year in which the

		From the employer		which we are legally obliged to report certain information and any other third parties if necessary.	agreement with ATTING cludes.
Events  To organize events and send information related to the event.	We process the following categories of personal data:  Ordinary personal data:  General work-related information, such as name, e-mail address, phone number, etc.	We collect personal data from the following sources:  • Directly from the data subject	The processing of the personal data is based on our legitimate interest in arranging and organizing the event, cf. GDPR art. 6(1)(f).	We share personal data with our suppliers, including IT- and support suppliers, which assist us.  Such sharing namely takes place with our website provider.	We store personal data related to the event for up to one year after the event is held unless we have other legitimate reasons to store the personal data.

#### 4. RECIPIENTS

In addition to disclosing personal data to the categories stated above, we may disclose personal data to external partners, if we organize the event in collaboration with a partner. We may also share personal data with public authorities to which we are legally obliged to report certain information and any other third parties if necessary.

### 5. TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

In some cases, we will be transferring personal data to countries outside the EU/EEA. If the personal data is transferred to a country that is not deemed secure by the European Commission, the data protection regulations may be less restrictive than in Denmark and the rest of the EU/EEA.

Such transfers will take place based on the Standard Contractual Clauses approved by the European Commission, and supplementary measures will be implemented when necessary. The transfer will also be based on the Data Privacy Framework (DPF), if the data importer is certified under the DPF. You can always obtain a copy of these contracts or request more general information about transfers to third countries by contacting NET.

# NORLYS ENERGY TRADING

#### 6. YOUR RIGHTS

As a data subject under the GDPR, you have a number of rights. Please use the contact details at the beginning of the privacy policy if you wish to make use of your rights.

Your rights include the following:

- You have the right to request access to the personal data we process about you,
- · You have the right to have inaccurate information about you rectified,
- In certain cases you have the right to have certain information about you deleted,
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You can withdraw your consent by contacting NET.
- You have the right to receive your personal information in a structured, commonly used and machine-readable format (data portability).
- You have the right to object to our processing of your personal data in certain situations, and always if the processing is for direct marketing purposes.
- You can always lodge a complaint with the Danish Data Protection Agency. See more at <a href="https://www.datatilsynet.dk/">https://www.datatilsynet.dk/</a>.

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.

## 7. VERSION HISTORY

Description	Author	Approved by	Date of approval	Version
General update of the pri-	LSL	JLE	12.11.2024	1 1
vacy policy in its entirety.	LSL	JLE	12.11.2024	1.1