

Fu-Gen External Privacy Notice

At Fu-Gen (below “we”, “us”, “our”) one of our main priorities is your privacy. It is important to us that you feel safe when we process your personal data. In this privacy notice, you can learn more about what personal data we collect and process about you, why and how we do it and what rights you have. If you have any questions about our processing of your personal data, please contact us via the contact details provided below.

Data Controller and Contact Details

The Fu-Gen group of companies consist of several international companies that work closely together. As a main rule, the local Fu-Gen company that you interact with or have a relationship with and the Swiss parent company, Fu-Gen AG, will be joint data controllers when we process your personal data.

Please note that when you apply for a job with a certain Fu-Gen company, that Fu-Gen company will be the sole data controller for the processing of your personal data in the recruitment process.

If you have any questions about how your personal data is processed, please contact the local Fu-Gen entity using the contact details below. If you have entered into an agreement with another local Fu-Gen entity than the ones listed below, please direct any questions about the processing of your personal data directly to the parent company.

Parent Company	Contact Details
Fu-Gen AG (Corp. reg. no: CHE-293.683.048)	Address: Claridenstrasse 34, 8002 Zürich, Switzerland E-mail address: info@fu-gen.com
Local Fu-Gen Companies	Contact Details
Fu-Gen Energi AB (Corp. reg. no: 559156-6764)	Address: Kungsgatan 30, 111 35 Stockholm, Sweden E-mail address: info@fu-gen.com
Fu-Gen Energia Oy (Corp. reg. no: 3327286-2)	Address: C/o Spaces Tripla, Firdonkatu 2 T 63, 00520 Helsinki, Finland E-mail address: info@fu-gen.com

Who We Process Personal Data About and the Personal Data We Process

The Individuals We Process Personal Data About

To make it easier for you to find the information relating to your specific situation, we have divided the information about how we process your personal data into different sections, depending on how you interact with our business(es). Please note that multiple sections may be relevant to you depending on your relationship and/or interaction with us. In addition, we have included a section that concerns everyone who interact with us, see section 6.

Category of Individuals	Explanation	Relevant Section
Landowners	You who are the owner of real property within an area where we are developing or operating a renewable energy project, or the representative of such owner of real property	See section 1

Category of Individuals	Explanation	Relevant Section
Individuals involved in our public project developments and other project related stakeholders	You who are engaged in a public project development of ours by, for example, representing an authority or replying to consultations (such as case examiners or individuals of the public), or interacting or being involved in our renewable energy projects (under development or operation), such as, for example, representing sami villages, road associations, community funding, other associations or clubs, etc.	See section 2
Business contacts	You who represent/is a contact person of a company who we interact with within our line of business (such as suppliers, customers, business partners, shareholders, etc.)	See section 3
Website visitors	You who visit our website	See section 4
Candidates	You who apply for a job in one of the Fu-Gen group of companies	See section 5
References	You who have been identified as a reference by a candidate in a recruitment process	See section 5

The Personal Data We Process

The personal data we process about you depends on our relationship and how you interact with us. The types of personal data that we process are divided into the following categories. However, please note that this does not mean that we necessarily process all types of data about you listed under each category.

Category of Personal Data	Example
Identification details	Personal data used for identification such as name, personal identification number/social security number and copy of passport
Contact information	Personal data used for communication such as address, telephone number and e-mail address
Company information	Personal data about your affiliation with a company such as information about your role within the company you represent and company name
Company ownership	Personal data about company ownership such as information on ultimate beneficial owners (UBO) and ownership percentage
Property information	Personal data regarding a real property such as the owner, land registry reference/property designation and address of the property
Financial information	Personal data necessary to conduct bank transfers such as bank details and payment instructions
Communication	Personal data provided in communication with us such as the content of e-mails, telephone calls and received documents
Technical information	Personal data obtained from cookies and similar tracking technologies such as IP address, device information, user ID, session statistics, date of birth, browsing behaviour and website settings
Recruitment information	Personal data requested in the recruitment process such as CV, qualifications and references

How We Collect Your Personal Data

We mainly collect personal data directly from you, for example when you communicate with us, visit our website or enter into a land lease agreement or other agreement with us. We also collect personal data about you from other sources, such as:

- Contact and property information from private and public registers.
- Contact and company information from the company where you are employed.
- Recruitment information and other information regarding your suitability for a position with us from references you provide us with.

Situations Where We Need Your Personal Data

Generally, you must provide the personal data we request if we are to, e.g., enter into a land lease agreement with you, administer the recruitment process which you are involved in or for us to comply with legal requirements. If you do not provide us with the personal data, this may result in us not being able to enter into an agreement with you or include you in the recruitment process. If you have any concerns about our processing of your personal data, please contact us using the contact details above.

How We Process Your Personal Data

1. Landowners

Purpose	Personal Data	Legal Basis	Storage Time
To communicate with Landowners about our business and possible co-operations	Identification details, Contact information, Property Information, Communication	Our legitimate interest (GDPR, article 6.1(f)) to communicate with landowners to investigate the possibilities for future or present cooperation Contact us if you would like to know more about how we have balanced your interests against ours	Three years from the time of our latest communication with you
To conclude, administer and fulfil our obligations according to lease agreements, including project management	Identification details, Contact information, Property information, Financial information, Communication	<u>Private individual as landowner:</u> Performance of a contract (GDPR, article 6.1(b)) <u>Representative of Landowner:</u> Our legitimate interest (GDPR, article 6.1(f)) to conclude, administer and fulfil our obligations toward the owner you represent Contact us if you would like to know more about how we have balanced your interests against ours	Stored during the term of the lease agreement and for two years thereafter
To fulfil legal obligations, such as to save accounting information	Financial information	Compliance with a legal obligation (GDPR, article 6.1(c))	Stored up to and including the seventh year after the end of the calendar year in which the financial year ended

2. Individuals Involved in Our Public Project Developments, and Other Project Related Stakeholders

Purpose	Personal Data	Legal Basis	Storage Time
To seek permits for our renewable energy development projects	Identification details, Contact information, Communication	Compliance with a legal obligation (GDPR, article 6.1(c))	Stored during the permit process and five years thereafter
To manage responses from the public in relation to consultations etc. for our development projects	Identification details, Contact information, Communication	Compliance with a legal obligation (GDPR, article 6.1(c))	Stored during five years from receipt of the response
To communicate with project related stakeholders about our projects, to consider their potential interests in the project	Identification details, Contact information, Communication	Our legitimate interest (GDPR, article 6.1(f)) to communicate with stakeholders to consider your potential interest in the projects. Contact us if you would like to know more about how we have balanced your interests against ours.	During the lifetime of the relevant project

3. Business Contacts

Purpose	Personal Data	Legal Basis	Storage Time
1. To keep shareholder's record 2. To administer different aspects of our shareholder agreements	Identification details, Contact information, Company ownership	1. Compliance with a legal obligation (GDPR, article 6.1(c)) 2. Our legitimate interest (GDPR, article 6.1(f)) in administering our shareholder agreements, such as communicating with our shareholders and verify UBO Contact us if you would like to know more about how we have balanced your interests against ours	The personal data in the shareholder records are stored for an indefinite period of time due to legal requirement. Other personal data are stored during the applicable shareholding period and two years thereafter
To conclude, administer and fulfil our obligations according to the applicable agreements	Identification details, Contact information, Company information, Financial information, Communication	Our legitimate interest (GDPR, article 6.1(f)) to conclude, administer and fulfil our obligations toward the company you represent Contact us if you would like to know more about how we have balanced your interests against ours	Stored during the agreement and seven years thereafter

Purpose	Personal Data	Legal Basis	Storage Time
To verify your authority to represent the company and perform know your customer (KYC) controls	Identification details, Company ownership	Our legitimate interest (GDPR, article 6.1(f)) to control your authority and that we comply with sanctions legislation	During the agreement period and two years thereafter
To fulfil legal obligation to save accounting information	Financial information	Compliance with a legal obligation (GDPR, article 6.1(c))	Stored up to and including the seventh year after the end of the calendar year in which the financial year ended

4. Website Visitors

Purpose	Personal Data	Legal Basis	Storage Time
To ensure that the basic functions of the website can operate effectively <i>Please read more in our cookie policy</i>	Technical data	Your consent (ePrivacy Directive and GDPR, article 6.1(a))	Stored in accordance with our cookie policy
To measure traffic on our website and analyse user behaviour in order to improve user experience and security <i>Please read more in our cookie policy</i>	Technical data	Your consent (ePrivacy Directive and GDPR, article 6.1(a))	Stored in accordance with our cookie policy
To improve user experience and display external content, networks and platforms on our website <i>Please read more in our cookie policy</i>	Technical data	Your consent (ePrivacy Directive and GDPR, article 6.1(a))	Stored in accordance with our cookie policy
To build and run our website <i>Please read more in our cookie policy</i>	Technical data	Your consent (GDPR, article 6.1(a))	Stored in accordance with our cookie policy
To perform platform service and hosting for our website <i>Please read more in our cookie policy</i>	Technical data	Your consent (GDPR, article 6.1(a))	Stored in accordance with our cookie policy

5. Candidates and References

Purpose	Personal Data	Legal Basis	Storage Time
To manage the recruitment process, e.g., to communicate with you, review the application, assess suitability for a position, make decisions regarding appointment and provide feedback if requested	<u>Candidate:</u> Identification details, Contact information, Communication, Recruitment information <u>Reference:</u> Identification details, Contact information, Communication	Our legitimate interest (GDPR, article 6.1(f)) to manage the recruitment process and ensure that we hire the right person Contact us if you would like to know more about how we have balanced your interests against ours	Stored during the recruitment process and one year thereafter
To verify the information in the application and assess a Candidate's suitability for a position with us through correspondence with indicated References	<u>Candidate:</u> Identification details, Recruitment information, and possibly other information that the Reference provides. <u>Reference:</u> Identification details, Contact information, Communication	Our legitimate interest (GDPR, article 6.1(f)) to manage the recruitment process and ensure that we hire the right person Contact us if you would like to know more about how we have balanced your interests against ours	Stored during the recruitment process and one year thereafter
To save your application for future recruitment in case of other positions become available that we believe might suit you	<u>Candidate:</u> Identification details, Contact information, Communication, Recruitment information	Your consent (GDPR, article 6.1(a))	Stored for two years after the recruitment process, thereafter stored for each 12-month period that you agree to have your information saved by us
To monitor and evaluate our recruitment process, e.g., to streamline our processes and fulfil our equality obligations	<u>Candidate:</u> Identification details, Contact information, Recruitment information,	Our legitimate interest (GDPR, article 6.1(f)) in making our recruitment process better Contact us if you would like to know more about how we have balanced your interests against ours	Stored during the recruitment process and for two years thereafter. Statistical data derived from the personal data is saved until further notice (does not include personal data)

6. Processing to Comply with Laws, Legal Obligations and Voluntary Undertakings

Purpose	Personal Data	Legal Basis	Storage Time
Investigate incidents, respond to requests and provide requested information to a supervisory authority in the event of supervision	The categories of individuals and personal data requested in relation to the incidents and supervision	Compliance with a legal obligation (GDPR, article 6.1(c))	Stored for the duration of the incident or supervision and up to two years thereafter

Purpose	Personal Data	Legal Basis	Storage Time
Protect our interests in the event of a dispute	The categories of individuals and personal data necessary with regard to the subject matter of the dispute and the parties involved	Our legitimate interest (GDPR, article 6.1(f) to protect our interests in case of a dispute Contact us if you would like to know more about how we have balanced your interests against ours	Stored for the duration of the dispute and ten years thereafter
Transfer personal data in the event of a merger or acquisition	The categories of individuals and personal data covered by the merger or acquisition	Our legitimate interest (GDPR, article 6.1(f)) to carry out a merger or acquisition Contact us if you would like to know more about how we have balanced your interests against ours	Not applicable
Accommodate your request to exercise any of your rights	The categories of individuals and personal data that you provide in your request and that are necessary to fulfil your request	Compliance with a legal obligation (GDPR, article 6.1(c))	Stored for 12 months after we have handled your request

Who We Share Your Personal Data With

We may need to share your personal data with others to execute our business as well as to comply with laws and regulations. This includes:

- Other companies within our group of companies (whether wholly or partly owned by Fu-Gen), as well as our investors, as we share systems between the companies.
- IT service providers who manage the necessary operation, technical support and maintenance of our IT solutions, such as internally used systems, platforms and hosting services.
- Providers of analytics services, video platforms and social media platforms.
- Bank and payment service providers whose services we use to manage our payment transactions.
- External recruitment firms who help us in our recruitment processes.
- External advisors and consultants who help us in different areas of our business (such as lawyers and auditors).
- Potential buyers in case of a merger, an acquisition or a sale of all or parts of our assets.
- Authorities in case of a legal obligation, dispute or request.
- Courts in the event of a dispute or other proceedings.

Where We Process Your Personal Data

We always strive to process your personal data within the EU/EEA. However, in certain situations we may need to transfer your personal data to partners or service providers located outside the EU/EEA (third countries), such as when we share personal data with our group companies operating outside the EU/EEA. For example, our group companies operate in Israel, Switzerland and the United Kingdom.

Regardless of where your personal data are processed, we always ensure that that your personal data enjoys a high level of protection. For example, Israel, Switzerland and the United Kingdom, have been deemed to offer [adequate protection by the EU commission](#) (GDPR, article 45). By contrast, when transferring personal data to other countries, we use the [European Commission's standard contractual clauses](#) (GDPR, article 46). In addition, we take additional technical and organisational security measures when needed.

Your Rights

General

We are accountable for your personal data being processed in a legal, transparent and open manner in relation to you, and that your personal data are accurate and up to date. The GDPR awards you many rights. If you want to exercise any of your rights, you can contact us by using the contact details above. We will get back to you as soon as we can, and at the latest within one month of receiving your request. If we cannot answer your request or need more time, we will explain why.

Right of Access

You have the right to know if we process personal data about you or not. If we do, you also have the right to receive information about the personal data we process and why we do it. Further, you have the right to receive a copy of all personal data we have about you. If you are interested in any specific information, please indicate this in your request. For example, you can specify if you are interested in a certain type of information, such as the specific contact details we have about you, or if you want information from a certain time.

Right to Rectification

If the personal data we hold about you is inaccurate, you have the right to have the personal data corrected. You also have the right to complete incomplete personal data, including by providing supplementary information. Once we have corrected or completed your personal data, we will inform those we have shared your personal data with about the update (when applicable), if it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your personal data with. If you request to have data corrected, you also have the right to request that we restrict our processing during the time we investigate the matter.

Right to Erasure (Right to Be Forgotten)

In certain cases, you have the right to request that your personal data are erased, e.g.:

- If the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, or
- When the personal data have been unlawfully processed.

If we erase the personal data following your request, we will also inform those we have shared your personal data with (when applicable), if it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your personal data with.

Right to Request Restriction

Restriction means that the personal data are marked so that it may only be processed for certain limited purposes in the future. The right to restriction applies:

- When you believe your personal data are inaccurate/incomplete and you have requested rectification. If so, you can also request that we restrict our processing while we investigate if the personal data are accurate/complete or not,
- If the processing is unlawful but you do not want the personal data to be erased,
- When you have objected to the processing and during the time we verify our legitimate grounds, or

- When we no longer need the personal data for the purposes for which we collected it, but you need it to be able to establish, exercise or defend legal claims.

Even if you request that we restrict our processing of your personal data, we may still use it for storage, to assert or defend legal claims or to protect someone else's rights. We may also use the personal data for reasons relating to important public interest. We will let you know before the restriction expires.

If we restrict the processing of your personal data, we will also inform those we have shared your personal data with (when applicable), if it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your personal data with.

Right to Object

You have the right to object to processing that is based on our legitimate interest. If you object to the use, we will, based on your situation, evaluate if our interests in using the personal data outweigh your interests in the personal data not being used for that purpose. If we are unable to provide compelling legitimate grounds that override yours, we will stop using the personal data you object to – provided we do not have to use the data to establish, exercise or defend legal claims. If you object to the use, you also have the right to request that we restrict our use during the time we investigate the matter.

Right to Data Portability

Data portability means that you have the right to obtain the personal data we have collected about you, from you, in a structured, publicly available and machine-readable format and that you have the right to transfer it to another controller.

The right to data portability only applies:

- For data collected from you, about you,
- If the processing takes place due to the fulfilment of a contract with you, and
- The processing is automated.

Right to Withdraw Consent

You have the right to withdraw your consent for a specific processing at any time. Your withdrawal will not affect processing that has already been carried out.

Right to Complaint

If you have any objections or complaints about the way we process your personal data, please contact us and we will try to solve your issue. Use our contact details above.

You also have the right to lodge a complaint with the supervisory authority in the country where you live, work or where you believe an infringement of the GDPR has taken place. The relevant authority in each country can be found [here](#).

Changes to the Information

We reserve the right to change this privacy notice from time to time. We will inform you of any changes by posting the updated privacy notice on our website. If we make any material changes, we will send you a notification by e-mail.