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1 Document Information

1.1 Document Revision

Rev	Date	Description/Status	Prepared	Reviewed	Approved

1.2 Document References

Ref	Doc. Number	Description	Rev	Author	Date

1.3 Distribution List

Rev	Issue Date	Issued To	Company	Function

2 Privacy Statement Norther General

We highly value the safety and confidentiality of your personal data we collect and use. Through this privacy statement, we wish to inform you about which personal data Norther processes, how Norther processes this personal data, the reasons for which Norther processes the personal data, as well as the rights you have to exercise control over the personal data Norther retains.

1. SCOPE

1.1. We process your personal data when you:

- use our website (www.norther.be);
- enter into an agreement with us or communicate with us in that context;
- visit our offices, locations or facilities (e.g. our turbines); and
- communicate with us via email, telephone or another digital communication channel.

1.2. This privacy statement may be amended as provided in Article 8.

2. WHO ARE WE?

2.1. In this privacy statement, "We" refers to Norther:

Name:	Norther NV
Address:	Esplanadestraat 14
Company Number:	0896052742
Email:	privacy@norther.be

2.2. We are responsible for collecting and using your personal data as explained in this privacy statement. If you have any questions or complaints about this, you can always contact us via email at privacy@norther.be.

2.3. In certain circumstances, third parties may also be responsible for processing your personal data, for example, if you click on a link and thereby leave our website. In such cases, we recommend that you consult the privacy statement of these third parties. .

3. WHAT PERSONAL DATA DO WE PROCESS AND WHY?

We process your personal data only for a specific purpose and as permitted by law. Below, we explain in more detail the instances in which we collect and use your personal data. If we do not receive your personal data directly from you, we will also inform you of this below..

3.1. WHEN YOU USE OUR WEBSITE

3.1.1. When you use our website (www.norther.be), we collect and use the following personal data:

What personal data?	Why?	Legal basis?
Technical information (e.g., server log files) about your visit and the device you use (e.g., IP address and timestamp). We cannot identify you based on this information, but third parties may be able to (e.g., your internet service provider).	To ensure the smooth functioning of our website and to detect and prevent malware, illegal content and behavior, and other forms of possible misuse.	Our legitimate interest in keeping our online presence secure (Art. 6.1 (f) GDPR).

3.2. WHEN YOU ENTER INTO AN AGREEMENT WITH US

3.2.1. When you enter into an agreement with us, we collect and use the following personal data:

What personal data?	Why?	Legal basis?
Identity and contact details you provide us within the context of the agreement (e.g., email address and professional function)	To fulfill our contractual obligations.	When you are our supplier as an individual, the legal basis for processing is the necessity for the performance of the contract (Art. 6.1 (b) GDPR). If you act on behalf of a company or other legal entity, the legal basis is our legitimate interest in contracting with our customers or suppliers (Art. 6.1 (f) GDPR).
Your company and billing details.	To conduct our normal business administration (e.g. invoicing and customer relationship management).	Our legitimate interest to manage our business activities in a responsible and professional manner (art. 6.1 (f) GDPR).

3.3. WHEN YOU VISIT US

3.3.1. When you visit us, we collect and use the following personal data:

What personal data?	Why?	Legal basis?
Camera footage taken during your visit in which you are recognizable.	To ensure the security of our locations and facilities.	Our legitimate interest in protecting and managing our business operations responsibly and professionally (Art. 6.1 (f) GDPR).
Technical information about your device used to connect to our guest Wi-Fi network.	For you to securely use our guest Wi-Fi network.	Our legitimate interest in providing you with secure access to our Wi-Fi network for guests (Art. 6.1 (f) AVG). (art. 6.1 (f) GDPR).

3.4. WHEN YOU COMMUNICATE WITH US

3.4.1. When you communicate with us via phone, email, or another digital communication channel, we collect and use the following personal data:

What personal data?	Why?	Legal basis?
Identity and contact details you provide us, the content of your communication, the technical details of the communication itself (e.g., date and time), and if applicable, the device you use.	To enable communication between you and us (e.g., when you contact us via phone or email).	Our legitimate interest in responding to requests, questions, or comments or in proactively contacting you for questions of any kind (Art. 6.1 (f) GDPR).

3.5. IN ALL OF THE ABOVE CASES

3.5.1. Voor alle persoonsgegevens die wij in de bovengenoemde omstandigheden verzamelen, willen wij echter duidelijk maken dat wij uw persoonsgegevens ook zullen verwerken in de volgende gevallen.

What personal data?	Why?	Legal basis?
Above mentioned personal data	To comply with our legal obligations or to meet any reasonable request from competent law enforcement agencies, judicial authorities, government agencies, or bodies, including competent data protection authorities.	Our legal obligation (Art. 6.1(c) GDPR).
Above mentioned personal data	To prevent, detect, and combat fraud or other illegal or unauthorized activities.	Our legal obligation (Art. 6.1(c) GDPR).
Above mentioned personal data	To defend ourselves in legal proceedings.	Our legitimate interest to use your personal data in these proceedings (Art. 6.1(f) GDPR).
Above mentioned personal data	To inform a third party in the context of a potential merger with, acquisition by, or demerger by that third party, even if that third party is located outside the EU.	Our legitimate interest to engage in business transactions (Art. 6.1(f) GDPR).

4. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

- 4.1. In principle, we do not share your personal data with anyone other than those who work for us and the suppliers who assist us in processing your personal data. Anyone who has access to your personal data will always be bound by strict legal or contractual obligations to keep your personal data secure and confidential..
- 4.2. We do not send your personal data outside the European Economic Area (EEA). We will only transfer your personal data outside the EEA if you or your employer, as a customer or supplier, have establishments outside the EEA with which we need to communicate. If a transfer does occur, we will take sufficient safeguards to protect your personal data during the transfer (e.g., by entering into a contract based on standard data protection clauses approved by the European Commission).

5. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

- 5.1. Your personal data is only processed for as long as necessary to achieve the purposes described above or until you withdraw your consent for the use of cookies. In this article, we provide the information you need to assess how long we keep your personal data identifiable.
- 5.2. As a general rule, we will de-identify your personal data when it is no longer needed for the purposes described above, or when the retention period, as explained in this Article 5, has expired. However, we may not delete your personal data if there is a legal or regulatory obligation or a court or administrative order that prevents us from deleting it. Additionally, it is possible that we have a legitimate interest in retaining your personal data for a longer period.
- 5.3. All personal data collected through our website will be retained for as long as necessary to pursue the legitimate interests mentioned in Article 3.1. Technical information such as our server log files will be retained for up to 6 months after your visit to our website, after which they will be deleted or de-identified..
- 5.4. Personal data collected during your visit to our premises is retained for as long as necessary to fulfill the legitimate interests mentioned in Article 3.3. If you have used our Wi-Fi network, your personal data is retained until it is no longer necessary in this context, which we consider to be up to 12 months after your last access to our Wi-Fi network. CCTV footage captured during your visit is retained for no longer than one month after the footage was recorded, unless there is a legal reason to retain it for a longer period or if the footage is part of a dispute. In such cases, we retain the footage for the duration of the dispute.
- 5.5. All personal data collected through our interactions with you via phone, email, or other digital communication channels is retained for as long as necessary to communicate with you and to maintain a historical archive of our communications. This allows us to refer back to previous communications if you return with new questions, requests, comments, or other input

6. HOW DO WE SECURE YOUR PERSONAL DATA?

The security and confidentiality of your personal data are very important to us. Therefore, we have taken measures to ensure that all processed personal data is securely stored. These measures include, among others, technical and organizational measures to secure our infrastructure, systems, applications, and processes. We have also taken other measures, such as implementing internal policies, limiting processing to the personal data necessary for achieving the purposes, and minimizing the processing of personal data.

7. YOUR RIGHTS CONCERNING YOUR PERSONAL DATA

According to the GDPR, you have the right to be informed, the right of access to your personal data, the right to correct your personal data, the right to delete your personal data, the right to transfer your personal data that you have provided, the right not to be subject to fully automated decision-making, the right to object to the processing of your personal data, the right to withdraw your consent, and the right to file a complaint with the territorially competent supervisory authority. In Belgium, this

is the Data Protection Authority (GBA). To exercise any of your rights, you can submit a written request to privacy@norther.be stating the right your request pertains to. You are free to generate your request by following the steps at <https://www.rightso.eu>. However, using this online tool is not a requirement for submitting such a request.

8. CHANGES TO THIS PRIVACY STATEMENT

- 8.1. We reserve the right to change this privacy statement on our own initiative and at any time. If material changes to this privacy statement could affect the processing of your personal data, we will communicate these changes to you in a manner consistent with how we normally communicate with you (e.g., via email or a notice on our website).
- 8.2. We invite you to view the latest version of this privacy statement on our website (www.norther.be)

9. HOW CAN YOU CONTACT US?

If you have any questions or complaints about the processing of your personal data, please do not hesitate to contact our privacy officer. You can reach our privacy officer via email: privacy@norther.be.