

# **Policy**

## General data privacy policy

This privacy policy describes how Green Therma ApS ("we", "our", "us") collects, stores, shares, and protects your personal data when you interact with our services, website, or contact us. We comply with the General Data Regulation (GDPR).

#### 1.1 Data controller

Green Therma ApS is the data controller for the processing of personal data collected from our customers, website visitors, and business contacts.

## Company information:

Green Therma ApS

Hjalmar Brantings Plads 6, 2100 København Ø, Denmark Email: contact@greentherma.com

CVR no. 43858076

If you have questions about how we process your personal data, or anything related to the content of this policy, you are welcome to contact us at the above address.

#### 1.2 Processing activities

We only process your data when we have a valid legal basis in accordance with Article 6 of the General Data protection Regulation (GDPR) and guidelines from the European Data protection Board (EDPB).

We only process the personal information that you freely provide us with in accordance with GDPR Article 6(1)(a), (b), (c) and (f) in regard to consent, contractual necessities, legal obligations, and legitimate interests.

#### 1.2.1 When you visit our website

- Purpose: To analyze and optimize user experience, maintain functionality, and collect statistics.
- Data collected: IP address, browser type, operating system, referring/exit pages and other information related to user behavior.
- Legal basis:
  - Article 6(1)(a) Consent (for non-essential cookies, e.g., analytics via our Cookie policy).
  - Article 6(1)(f) Legitimate interest (strictly necessary cookies for a secure and functional website).
- Storage of data: Personal data from webpage subscriptions are not disclosed to third parties. Data is stored until services (e.g., subscriptions) are unsubscribed.

## 1.2.1.1 Transfers subject to appropriate safeguards

We use Google Analytics, a service provided by a US company, to understand how visitors use our website.

This means some information about you — like your IP address, browser type, and how you use our site — may be transferred outside the EU. We only transfer data to entities in the US, which are certified according to the Data Privacy Framework between US and the EU (<u>Data Privacy Framework</u>).

If you do not wish us to collect this information, you can decline all Cookies that are not strictly necessary.

#### 1.2.2 When you contact us

- Purpose: To respond to inquiries, offer support, and manage communication.
- Data collected: Name, email, phone number, and any additional data provided.
  - Legal basis: Article 6(1)(f) Legitimate interest in maintaining effective and professional communication.
- Storage of data: Data may be shared with suppliers, service and support providers and other collaborators.
  Data is only kept as long as necessary.

#### 1.2.2 Contractual obligations

- Purpose: To fulfill agreements made with customers, suppliers, or partners.
- Data collected: Contact details, company information, and communication history.
- · Legal basis:
  - Article 6(1)(b) Necessary for the performance of a contract with Green Therma.
  - Article 6(1)(f) Legitimate interest necessary in maintaining effective and professional communication with all stakeholders.
- Storage of data: Data may be shared with suppliers, service and support providers and other collaborators. Data is only kept as long as necessary.

#### 1.2.3 Accounting

- Purpose: Compliance with applicable national, federal, and state accounting and bookkeeping regulations.
- Data collected: Invoices, names, contact information and other relevant financial information.
- Legal basis:

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- Article 6 (1)(c) Legal obligation under applicable financial reporting and bookkeeping laws.
- Storage of data: Data is shared with tax authorities, auditors, etc., and retained for at least 5 years after the relevant fiscal year.

## 1.3 Due Diligence and Screening

- Purpose: To assess potential counterparts, advisors, or partners for reputational, financial, legal, or compliance (e.g., sanctions screening, KYC) before and during collaboration.
- Data collected: Name, date of birth, CPR-no., CVdetails, nationality, financial profile and public sanction listings.
- Legal basis:
  - Article 6(1)(a), (b), (c), and (f).
  - Article 9(2)(e) Publicly disclosed data.
  - §8(3) and §11(2) of the Danish Data Protection Act.
- Storage: Data is kept as long as relevant to current or potential collaboration, and no longer than 5 years after project closure.

### 1.4 Your rights under the GDPR

As a data subject, you have several rights under the GDPR. These rights are intended to give you transparency and control over your personal data.

To exercise these rights, please contact us at <a href="mailto:contact@greentherma.com">contact@greentherma.com</a>.

## 1.4.1 Rights of Access

You can request a copy of the personal data we hold about you.

## 1.4.2 Right to Rectification

You may request correction of inaccurate or incomplete data

## 1.4.3 Right to Erasure (Right to be Forgotten)

You can request deletion of your personal data under certain conditions.

## 1.4.4 Right to Restriction of Processing

You can ask us to temporarily or permanently limit processing under certain conditions.

## 1.4.5 Right to Object

You may object to our processing, especially if based on legitimate interest.

## 1.4.6 Right to Data Portability

If processing is based on consent or a contract, you may request data transfer.

## 1.4.7 Right to Withdraw Consent

You can withdraw any consent previously given at any time.

### 1.4.8 Right to lodge a Complaint

You have the right to file a complaint with the Danish Data Protection Agency (<a href="www.datatilsynet.dk">www.datatilsynet.dk</a>) if you believe we are processing your data in violation of the GDPR.

### 1.5 Data Security

We have implemented appropriate technical and organizational security measures to protect personal data against unauthorized access, alteration, loss, or disclosure in accordance with GDPR Article 32.

#### 1.6 Changes to this Policy

We may update this policy from time to time. The current version is always available on our website.

#### 1.7 Contact

If you have any questions about how we process your personal data or wish to exercise your rights, you are welcome to contact us-at-contact@greentherma.com.

Jørgen Peter Rasmussen

CEO & Founder, Member of the Board

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