Data currently being collected across websites:

Website: Alternus Clean Energy Inc.

Alternus Clean Energy Inc., GDPR Policy

Alternus Clean Energy Inc. GDPR Policy

This Privacy Policy describes the manner in which Alternus Clean Energy Inc. ("Alternus", "ALCE", "Company", "we", "us" or "our"), will collect and process your **personal data when you access, browse and use the Alternus website.**

Control of your personal data

Alternus is the data controller and is responsible for the personal data we obtain through your use of our website.

The personal data we collect

We may collect, process, store and transfer the following types of your personal data:

Identity and contact data such as your name, job title, company details, email address, phone number and any further personal data of this type which you include when completing the enquiry form text input fields or newsletter sign up under the 'Contact' and "News" sections of the website.

- Technical Data such as your IP address, browser type and version, time zone setting, geographic location, operating system and the date and time you access sections of our website.
- Usage Data from analytics providers, such as Google Analytics, with respect to the length of time you spent on a particular page, and page interaction information.
- Marketing Data such as data relating to your preferences in receiving marketing communications from us, where you have informed us that you are interested in receiving information regarding the Company's activity and work. You can update your preferences in relation to receiving marketing data at any time and can easily unsubscribe from anything which you do not wish to receive by using the unsubscribe function at the bottom of the email we send or by emailing <u>ithelpdesk@alternusenergy.com</u>

How we collect your personal data

We collect your personal data via:

Direct Interactions when completing the text input fields in the 'Contact' and "News" section of the website. We may also collect your personal data when you communicate with us via email, telephone or otherwise.

Automated Technologies or Interactions: While it is not necessary to register a user account in order to access or view our website, we will receive technical data and usage data when you visit. We collect this data through the use of cookies.

How we use your personal data

We will only use your personal data when permitted by law to do so and then only for the purposes set out below, unless we reasonably consider that we need to use your personal data for another purpose compatible with the original purpose. If we are required to use your personal data for a purpose unrelated to the below, we will notify you accordingly and describe the relevant legal basis allowing us to do so.

Purpose/Activity	Type of Data	Legal basis for processing
To respond to users who submit their personal data and indicate they wish for us to communicate with them via the Contact section of the website	Identity and Contact Data	Consent
To respond to users who submit their personal data and indicate they wish for us to communicate with them via email newsletter	Identity and Contact Data	Consent
To maintain the website (including system maintenance, troubleshooting or data analysis).		Necessary for our legitimate interests (running our business and ensuring our website is secure for users).
	Technical Data	Necessary to comply with a legal obligation.
To manage our relationship with you, including notifying you about changes to this Privacy Policy.	Identity and Contact Data	Necessary for the performance of a contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our website updated and relevant and to develop our business).

Please <u>contact us</u> if you need information regarding which specific legal ground we are relying upon in relation to a specific processing activity where multiple grounds are listed in the table above. Please note that we may process your personal data without your knowledge or consent under the provisions of this Privacy Policy if required to do so by law.

How we disclose your personal data

Any third party to whom your personal data is disclosed following your use of the website is only permitted to process your personal data for a specified purpose in accordance with our instructions and the law. For the purposes of conducting the processing activities outlined in the table above, it may be necessary for us to share your personal data with the following third parties from time to time:

- External IT Providers such as IT systems and support organisations and website hosting providers; and
- Public or Government Authorities in the event that we are required to disclose your personal data in order to comply with a legal obligation.

How we secure your personal data

Alternus takes great care to ensure that all your personal data processed under this Privacy Policy is secured. We maintain physical, technical, and organizational security measures to prevent personal data which is under our control from being lost, misused, disclosed, altered, or accessed in any unauthorized manner. We have additionally implemented procedures to deal with any suspected personal data breach and we will notify you and the applicable regulator of a breach where we are legally required to do so.

How long we keep your personal data

Alternus keep all the personal data processed pursuant to this Privacy Policy for a period of time which is no longer than necessary for the purposes for which it was processed and, in any event, no longer than is permitted under applicable law. In determining the appropriate retention period for a specific type of personal data which we process pursuant to this Privacy Policy, we determine the amount, nature and sensitivity of the personal data concerned. Furthermore, we examine any potential risk of harm which may result from any unauthorised use or disclosure of your personal data in addition to the purposes for which we process this data and the possibility of realising such purposes through alternative means. We also retain personal data where required by law to do so, or where such retention is justified under applicable statutory limitation periods.

Links to Third-party Websites

Where a link to a third-party website is provided on the website, the provision of such a link does not imply any endorsement of the third-party website by us. Alternus is not responsible for the content or terms of use of any third-party website.

Your Legal Rights

In accessing or using our website, you are entitled to a number of rights in relation to our collection and processing of your personal data pursuant to this Privacy Policy. To exercise any of these rights listed below, please <u>contact us</u> and we will respond as soon as we can. Your rights include the right to:

Request access to your personal data – you are entitled to request and receive a copy of the personal data which we hold for you.

Object to the processing of your personal data – in the event that we rely on the legal basis of our legitimate interest (or the legitimate interest of a third party) in order to process your personal data collected through your use of our website, you may be entitled to object to this processing if you believe that such processing impacts on your fundamental rights and freedoms. In some instances, we may demonstrate that we have a compelling legitimate basis to process your personal data which overrides your rights and freedoms.

Withdraw consent – you are entitled to withdraw consent to our processing activities in relation to your personal data at any time, in the event that we rely on consent as the legal basis for such processing activity. Any such withdrawal of consent will not affect the lawfulness of any processing of your personal data which is carried out by us prior to you withdrawing your consent.

Request correction – you are entitled to have any outdated or inaccurate personal data which we hold about you updated and corrected.

Request restriction – you are entitled to request that we suspend the processing of your personal data in the following circumstances:

- You wish for us to establish the accuracy of the relevant personal data;
- Our processing of your personal data is unlawful and you wish to suspend our processing of your personal data rather than erase it;
- You require the personal data which we hold about you in order for you to establish, exercise or defend legal claims (even if we no longer require it); or
- You have objected to our processing of your personal data but Alternus is required to obtain it to verify whether we have a legitimate legal basis to process it.

Request erasure – you are entitled to request that we delete personal data which we hold about you as a result of your access and use of our website should you consider that we have unlawfully processed your personal data, you have exercised your right to object to our processing (as outlined above), or we are required to erase such data in order to comply with the law. We may not always be in a position to comply with your request of erasure for certain specific legal reasons, which if applicable will be notified to you following your request.

Request transfer – in the event that we processed your personal data obtained through your use of our website in order to perform a contract with you, or you initially had provided us with consent to use automated information, we will provide you or your chosen third party with your personal data in a commonly used machine-readable format at your request.

Right to contact the national data protection authority – You are entitled to make a complaint at any time to the relevant national data protection supervisory authority in relation to our processing of your personal data pursuant to your use of the website. However, we would appreciate the opportunity to respond to any concern you may have in the first instance so please do <u>contact us</u> should you have any concerns in relation to such processing.

Changes to our Privacy Policy

We will update this Privacy Policy from time to time and any changes will be notified to you via our website. This version of our Privacy Policy was last updated in January 2024.

Contact Us

If you have any queries regarding this Privacy Policy or you wish to exercise any of your legal rights listed above, please contact our data privacy supervisor at <u>ithelpdesk@alternusenergy.com</u>