

Privacy policy

The purpose of this privacy policy is to describe how your information is collected and used when you visit stromarwind.co.uk or when you provide us with your personal data in other ways, for example when contacting or communicating with us through forms, questionnaires, surveys, supply chain events or other written or telephone communications or consultations.

Please read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Data controller

The legal entity responsible for collecting and processing your personal data is:

Stromar Offshore Wind Farm Ltd (also referred to as Stromar Offshore Wind, we, us and our) 2nd Floor
2 Lochrin Square
96 Fountainbridge
Edinburgh
EH3 9QA

info@stromarwind.co.uk

1. Processing activities

We may collect personal data about you whenever we contact you, you contact us, when you complete a questionnaire or survey that we provide or respond to a consultation or if we are in (or preparing to enter into) a contract with one another.

We process your personal data by using cookies when you use our digital services. You can read more about this in our cookie policy.

Purpose:

We use the data for the following purposes:

- Delivery of the digital service you have requested.
- Optimisation and development of the user experience of our website and the services we provide.
- Statistics for how our website is used and to improve the website.
- To record accurately and analyse any questions or responses you provide through any questionnaire, consultation, feedback or through other communications and to respond to you.
- To report on any questionnaire or consultation, detailing any feedback or issues that are
 raised or reported and how we have responded to them (although usually information
 contained in any public report will be aggregated and will not identify specific individuals).



Categories of personal data:

We process the following personal data about you:

- Information about your behaviour on our digital services (e.g. number of visits, information about how you access our digital services, including IP address, use of browsers and operating system, cookies, your domains of origin as well as what content you read).
- Identity and Contact Information such as your name, address, email address, telephone number and other contact details.
- Information about your company gathered when you submitted a Suppliers' Registration Form on our website.
- Information such as the contact form you completed on our website to better provide you
 with required services or information about our projects, developments, policies and
 activities,
- Consultation Information such as information you provide to us concerning yourself, your family, your business, your employer or any group on whose behalf you are authorised to respond, your feedback in response to any consultations relating to our projects, details from your social media accounts (including your interactions with us) and any other information you provide to us in connection with our projects.
- Land and Property Information such as information relating to your ownership or rental of land or property, any interest or rights you may have in respect of any land or property and information regarding any servitudes, wayleaves, easements, options, leases or consents over your land or property, how long you have owned it and details of any co-owners or others with rights over the land or property.
- Vulnerability Data which includes details of any vulnerabilities so that we can adapt our practices accordingly.

Legal basis:

We process your personal data as described on the following legal bases:

- where you have provided your consent; or
- where it is necessary to pursue our legitimate interests (or those of a third party) in providing the service you have requested, and your interests and fundamental rights do not override those interests. Our legitimate interests include:
 - o improving customer experience;
 - developing and improving digital services (in terms of both functionality and the system itself) and making it possible to share content on social media;
 - compliance with any guidelines, standards and codes of conduct (for example, by carrying out background checks or otherwise preventing, detecting or investigating fraud or money laundering);
 - o improvement and development of our business operations;
 - protection of our business, shareholders, employees and customers (for example, ensuring IT network and information security, enforcing claims, including debt collection); and
 - pursuit of our commercial activities and objectives, or those of a third party (for example, by carrying out direct marketing);



- where we need to comply with a legal obligation; or
- where we need to perform a contract we are about to enter into or have entered into
- with you.

2. How your personal data is collected

We use different methods to collect data from and about you including through:

- **Direct Interactions**. You may give us your personal data by completing forms on our website, filling out surveys or questionnaires we provide you with, or by corresponding with us or our third party service providers by post, phone, email, social media or otherwise. This includes personal data you provide when you:
 - o subscribe for updates or notifications;
 - o give us information about your products and services;
 - o give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will
 automatically collect Technical Data about your equipment, browsing actions or patterns.
 We collect this personal data by using cookies (as detailed in our cookie policy) and other
 similar technologies. We may also receive Technical Data about you if you visit other
 websites employing our cookies.
- Other Sources. We may collect personal data via other sources such as local planning authorities and councils, our business partners or suppliers, government agencies and regulators, or our partners in Stromar Offshore Wind.

3. Recipients of your personal data

Depending on the circumstances, Stromar Offshore Wind may share your data with:

- The companies who are partners in Stromar Offshore Wind including the group companies of BlueFloat Energy, Nadara (formerly known as Renantis) and Ørsted
- Suppliers, funders and advisors, including IT suppliers, insurers, legal firms, support and financial institutions cooperating with us in order to assist Stromar Offshore Wind
- Local planning authorities and councils
- Government agencies and regulators such as Ofgem
- Business partners
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.
 If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

In some cases we will appoint a third party to contact you about our projects, however, we will not pass any of your personal data to third parties for marketing purposes unless we tell you specifically. You have the right to withdraw consent to marketing at any time by contacting us at info@stromarwind.co.uk.

4. Personal data about other parties

If you provide personal data about other people (e.g. contact information for family or for



colleagues in the company in which you are employed), you must make sure that they agree to it, and that you have permission to provide us with such data. In addition, you must refer them to this privacy policy when you provide us with their data.

5. Transfer to third countries

In certain situations, Stromar Offshore Wind will transfer personal data to countries outside EU/EEA. Such transfers to third countries will be made on the following legal basis:

- If the countries have been deemed by the Commission of the European Union to have an adequate level of protection of personal data (so called safe third countries)
- If the countries have not been deemed by the Commission of the European Union to have an adequate level of protection of personal data, Stromar Offshore Wind will provide appropriate safeguards for the transfer through standard contractual clauses, as published by the Commission of the European Union, for the transfer of personal data to third countries. You can obtain a copy of this contract by contacting us on info@stromarwind.co.uk.

6. Storage

We will store your personal data as long as it is necessary for the purpose described in Section 1 above and/or as required under applicable law, and we will then delete or anonymise your personal data appropriately.

The criteria we will use to determine the storage period of your personal data will therefore depend on the purpose for which the personal data have been collected as well as the rules on storage which is required by specific national legislation.

7. Your rights

When we process your data, you have the following rights:

- You have the right of access to, rectification, or erasure of your personal data.
- You also have the right to object to the processing of your personal data and to have the processing of your personal data restricted.
- In particular, you have an unconditional right to object to the processing of your personal data for use for direct marketing purposes.
- 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 of consent will not affect the lawfulness for the processing performed before the withdrawal of your consent.
- You have the right to receive the personal data that you have provided yourself in a structured, commonly used and machine-readable format (data portability).
- You have the right to lodge a complaint with a supervisory authority, for instance the Information Commissioner's Office ("ICO").

You can exercise your rights by contacting us by email at info@stromarwind.co.uk.

These rights may be conditioned or restricted. For example, you may not have the right to data portability in this particular case. It depends on the specific circumstances in connection with the processing operations.

You will not have to pay a fee to access your personal data or excercise any of the other rights above. However, we may charge a reasonable fee where the request is clearly unfounded,



repetitive or excessive. Alternatively, we may refuse to comply with your request in those circumstances.

8. Contact Stromar Offshore Wind regarding the processing of personal data

If you wish to contact Stromar Offshore Wind regarding our processing of your personal data, please write to info@stromarwind.co.uk.

If you are unhappy with our response, you can lodge a complaint with your local data protection authority, the <u>UK Information Commissioner's Office (ICO)</u> by contacting:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113

9. Changes in our privacy policy

It will be necessary to update and amend this policy on an ongoing basis, and we reserve the right to update and amend it. In the event of an important amendment, we will notify you at stromarwind.co.uk or send an email if we deem this necessary.

This privacy policy was last updated November 2024.