

# PRIVACY POLICY RECRUITMENT

## 1. INTRODUCTION

This privacy notice describes how Ørsted ("we", "us", "our", or "Ørsted") processes your personal data in connection with our recruitment activities. The purpose of the privacy policy is to fulfill our obligation to provide you with information about our processing of your personal data in accordance with the General Data Protection Regulation ("GDPR").

We always strive to process personal data responsibly, and we take all relevant measures to ensure that our processing of personal data is in compliance with applicable legislation, including the GDPR and other relevant national legislation.

To the extent possible, we follow a uniform recruitment process across the countries where we are present. At the same time, we are aware of national differences in rules and practices, which in specific cases may imply small differences compared to the general recruitment process. Where country-specific conditions impact how we process personal data, we have indicated this separately. This means that – where relevant – under the description of our processing activities, we have stipulated specific national legal bases on which the processing of personal data rests.

We encourage you to read the privacy policy thoroughly.

## 2. DATA CONTROLLER

The legal entity responsible for the processing of your personal data is the company within the Ørsted group that is recruiting. The name of the company will either be stated in the job advert or in a separate notification that you receive from Ørsted.

If you are uncertain about which legal entity is responsible for the processing of your personal data in connection with a recruitment process, please contact us.

## 3. CONTACT INFORMATION

If you have questions about this privacy policy or if you wish to exercise your rights (section 8), you can contact us by sending an e-mail to [GDPR\\_Legal@orsted.com](mailto:GDPR_Legal@orsted.com).

Ørsted's German companies have appointed a Data Protection Officer ("DPO"). If you are involved in a recruitment process handled by one of our German companies, you can also contact the DPO by sending an e-mail to [dataprotectionDE@orsted.de](mailto:dataprotectionDE@orsted.de).

## 4. DESCRIPTION OF PROCESSING ACTIVITIES

In the following, you can read more about how we process your personal data in connection with our recruitment activities. Your personal data is not subject to automated decisions, including profiling.

## 4.1 CANDIDATE PROFILE

When you wish to apply for a position at Ørsted, or wish to be registered in our candidate database, you must create a candidate profile in our recruitment system. This also applies if you are contacted by an Ørsted recruitment employee or a recruitment agency with an invitation to apply for a position or to initiate a recruitment process at Ørsted.

We process your personal data, which you provide when creating a candidate profile, with the purpose of enabling you to be part of a recruitment process and to support you with the administration of your candidate profile.

In this context, we can process the following ordinary personal data about you:

- Personal details and contact information, including name, address, e-mail address, telephone number, country of residence, and nationality.
- Login details, including verification code upon creation of your profile.
- Details of what you consent to in connection with our recruitment activities.
- Your indication of whether you have signed up to receive information about new and relevant jobs ("job alerts").

We do not share your personal data with third parties in connection with the described purpose. However, we may allow the data to be accessed by our suppliers (data processors), in particular IT suppliers who assist with technical support.

Legal basis:

We process your personal data on the basis of GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to enable you to participate in a recruitment process with us.

Specific national legal basis:

**Germany:** If you wish to apply for a position or be involved in a recruitment process handled by our German organisation, the legal basis for processing is instead § 26(1) of the German Federal Data Protection Act (Bundesdatenschutzgesetz (BDSG)).

**United Kingdom:** If you wish to apply for a position or be involved in a recruitment process handled by our UK organisation, the legal basis for processing is instead the UK GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to enable you to participate in a recruitment process with us.

## 4.2 APPLICATION AND ASSESSMENT PROCESS

If you decide to send us your application for a vacant position or agree to participate in a recruitment process at our request, we use the information you provide to assess your suitability for the position in question. Initially, we will process your personal data to evaluate your application material, such as your application and CV.

If, on this basis, we wish to proceed with you in the recruitment process, we can process your personal data when we invite you to a job interview, including during and after the interview itself. In some cases, the interview may take place via video connection, and we may then process your

personal data to conduct the interview in this manner. After each interview round, notes from the interview are entered into our systems, including our rating of you based on the interview held.

During the first round of interviews, you may also be asked to send us a video where you answer a series of questions that will be used in our assessment process. If this is the case, we will process your personal data in relation to this.

*If the recruitment process is for a position in our Dutch organisation, you will not be asked to send us such a video, and no job interviews will be conducted via video connection.*

During the recruitment process, you may also be asked to complete a number of case-based assignments, and your results and solutions will then be processed as part of the assessment of your competencies and qualifications.

If the position is advertised as part of a recruitment campaign, such as our Graduate campaign, we can invite you to our "Assessment Days", where you will participate in job interviews and work on cases at one of our locations together with other job candidates. In this context, we can process your personal data to register your participation and assess your competencies, qualifications and the impression you leave based on your participation.

If we decide to proceed with other job candidates during a recruitment process, we can process your personal data to inform you of the rejection and, in some cases, provide you with feedback.

We can process the following ordinary personal data about you:

- Personal details and contact information, including name, address, e-mail address, telephone number, country of residence, and nationality.
- Details from your application and/or CV such as educational background and job history, including information about current and previous employers. Positions, work tasks, experiences, skills, qualifications, achievements, motivation for applying for the position, and similar information that you choose to provide.
- Details from other documents, including transcripts, course certificates, statements, and similar.
- Notes from job interviews and the overall recruitment process, including our rating of you and any other remarks we may have based on our review of your application material and/or conducted job interview(s) with you.
- Your results and solutions from completed case assignments.
- Video recording of you (if you are asked to send us a video, including your statements and actions in the video) – not applicable in the Netherlands.
- Details of time and place of the job interview(s) with you.
- Any details about participation in our Assessment Days.
- Information from correspondence with you, if relevant, for example, if we inform you of your rejection.

We generally do not share your personal data with third parties. However, we may allow the data to be accessed by our suppliers (data processors), in particular IT suppliers who assist with technical support.

Legal basis:

We process your personal data on the basis of GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to assess you in relation to the position that needs to be filled.

Specific national legal basis:

**Germany:** If we process your personal data in connection with our assessment of you for a position in our German organisation, the legal basis for processing is instead § 26(1) of the German Federal Data Protection Act (Bundesdatenschutzgesetz (BDSG)).

**United Kingdom:** If we process your personal data in connection with our assessment of you for a position in our UK organisation, the legal basis for processing is instead the UK GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to assess you in relation to the position that needs to be filled.

## 4.3 REFERENCES

If you are among the final candidates for a position at Ørsted, we may, in special cases, obtain reference information from your previous employer(s) that you have indicated that we can contact. Through this, we will seek to confirm the information and impressions we have gained of you during the recruitment process.

We can process the following of your ordinary personal data that we receive in connection with the reference check:

- Personal details and contact information, including name, e-mail address and telephone number.
- Your indication that we are allowed to contact the references you have provided.
- Details about your work, your work tasks, and your previous employer(s)' perception of your professional and personal qualifications.

We do not share the reference information with third parties.

Legal basis:

We process your personal data on the basis of GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to assess – in conjunction with the other information provided during the recruitment process – whether you are the right candidate for the position.

Specific national legal basis:

**Germany:** If you are involved in a recruitment process for a position in our German organisation, reference checks will not be made, and reference information will not be obtained.

**United Kingdom:** If you are involved in a recruitment process for a position in our UK organisation, we will instead process your personal data on the basis of the UK GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to assess – in conjunction with the other information provided during the recruitment process – whether you are the right candidate for the position.

## 4.4 BACKGROUND CHECKS

*For certain positions in the United Kingdom, it is a legal requirement to conduct a government administered security clearance ("National Security Vetting") of you. If you are required to undergo such security clearance in connection with a recruitment process, you will receive a separate privacy policy describing the processing of your personal data in this regard. In that case, we refer to the separate privacy policy.*

For some positions, it is condition of employment at Ørsted that a background check with a satisfactory outcome is conducted. In very special cases, we may therefore – at the conclusion of the recruitment process – request your permission to conduct a background check on you. The purpose is to ensure that the information we have received during the recruitment process is correct and to assess whether we believe you are the right person to fill the position in question.

Depending on the nature of the position and the rules that apply in the country where the position is to be filled, we can process the following ordinary personal data about you:

- Personal details and contact information, including name, address, e-mail address, telephone number, country of residence and nationality.
- Details of your education and career, including to verify your information about education, professional qualifications, and employment history.
- Details of work and residence permits to ensure that you have the right to work in the country in which you are applying for a position in.
- Publicly available information about your behaviour on social media and the internet, including LinkedIn.
- Details of any board and/or director positions and any exclusions.
- Any registrations on sanctions lists or in international databases on money laundering, fraud, terrorism, blacklisting and the like.
- Publicly available information about any involvement in legal proceedings.
- Publicly available information about any bankruptcy and financial matters, including significant debt.
- Our partner's conclusion on the completed background check, including score and any remarks.

For recruitments in certain countries (see below under "Legal basis") we may also – if we deem it absolutely necessary due to the nature of the position – request that you present your criminal record. In such cases, we can process information about any criminal convictions and/or offences appearing on your criminal record.

The information collected in connection with the background check can be collected from available sources on the internet, including your profile(s) on social media, and from various registers. Additionally, the information may – under certain circumstances – be collected from educational institutions, financial institutions, and the police and national authorities.

No employees at Ørsted will at any time come into possession of the personal data collected in connection with the background check. Ørsted only receives a report with a score and any remarks from our partner (data processor) who conducts the background check on behalf of Ørsted. Our partner is subject to and limited by our instructions.

The information provided in connection with the background check will not be shared with third parties.

Legal basis:

We process your ordinary personal data on the basis of GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to ensure as best as possible that our hiring does not pose a risk to the company, including financial or reputational risk.

Any processing of information about work and residence permits will take place on the basis of GDPR, article 6(1)(c) (legal obligation) as we have obligations to ensure that the people we hire have the right to work in the countries they are employed in.

Specific national legal basis:

**Denmark:** If the background check is conducted as part of a recruitment process to a position in our Danish organisation, and we deem it absolutely necessary in the specific case to request that you present your criminal record, we will process your personal data on the basis of § 8(3) of the Danish Data Protection Act (Databeskyttelsesloven), if the criminal record contains information about criminal convictions and/or offences. Our legitimate interest is to ensure that you have not been convicted of relevance to the position you are to be employed in.

**Germany:** If the background check is conducted as part of a recruitment process to a position in our German organisation, we will process your personal data on the basis of your consent. The legal basis for processing is therefore § 26(2) of the German Federal Data Protection Act (Bundesdatenschutzgesetz (BDSG)).

**United Kingdom:** If the background check is conducted as part of a recruitment process to a position in our UK organisation, we will process your ordinary personal data on the basis of the UK GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to ensure as best as possible that our hiring does not pose a risk to the company, including financial or reputational risk. Any processing of information about work and residence permits will take place on the basis of UK GDPR, article 6(1)(c) (legal obligation) as we have obligations to ensure that the people we hire have the right to work in the UK.

If, in very special cases, we deem it absolutely necessary to request that you present your criminal record, we can process this personal data on the basis of the UK GDPR, article 6(1)(f) with reference to the UK GDPR, article 10. Our legitimate interest is to ensure that you have not been convicted of relevance to the position you are to be employed in.

**Ireland:** If in very special cases it is necessary to process information in your criminal record, we will process the personal data on the basis of the Irish Data Protection Act, article 55(1).

**The Netherlands:** If the background check is conducted as part of a recruitment process to a position in our Dutch organisation, and we deem it absolutely necessary in the specific case to request that you present your criminal record, we will process your personal data on the basis of the Dutch GDPR Implementation Act (Uitvoeringswet Algemene verordening gegevensbescherming), article 33(3).

## 4.5 EMPLOYMENT OFFER

If we wish to offer you employment at Ørsted after a successful recruitment process, we can process your personal data to prepare and send the employment offer and your employment contract. We can also process your personal data if we communicate with you about matters

related to the employment offer or the employment relationship, including matters you inform us about, such as special conditions related to you that are significant for your ability to work or your employment in general.

We can process the following personal data about:

Ordinary personal data:

- Personal details and contact information, including name, address, e-mail address and telephone number.
- Details of the offered employment terms, including start date, position, working hours, location of work, salary, pension, any clauses, and other contract terms.
- Details about work and residence permits.
- Information from correspondence with you of we communicate about matters related to the employment offer or the employment relationship in general.

Sensitive personal data:

- Data concerning health, including information about your current or past illnesses or diseases, if it is expected to have a significant impact on your ability to work in the job you are to perform, and we need the information – for example, to make adjustments to the workplace setup to accommodate your needs.

We can share your personal data with our external advisors who assist with advice on personnel matters. Additionally, we can pass on your personal data to our system providers (data processors), including providers of HR systems.

Legal basis:

We process your ordinary personal data on the basis of GDPR, article 6(1)(b) (contractual obligation, including in order to take steps prior to entering into a contract).

If we process data concerning your health in connection with entering into the employment contract, for example, in order for us to make adjustments to the workplace setup or similar, we will process your sensitive personal data on the basis of GDPR, article 9(2)(b) (obligation in the field of employment).

Specific national legal basis:

**Denmark:** If, in special cases, we process your sensitive personal data in connection with the employment offer for a position in our Danish organisation, our processing of this data instead takes place on the basis of § 12(1) of the Danish Data Protection Act (Databeskyttelsesloven), with reference to the Danish Act on the Use of Health Information etc. on the Labour Market.

**Germany:** If we process your personal data to offer you employment in our German organisation, the processing of your personal data instead takes place on the basis of § 26(1) of the German Federal Data Protection Act (Bundesdatenschutzgesetz (BDSG)). If, in special cases, we process your sensitive personal data, our processing of this data instead takes place on the basis of § 26(3) of the German Federal Data Protection Act ((Bundesdatenschutzgesetz (BDSG)).

**United Kingdom:** If we process your personal data to offer you employment in our UK organisation, the processing of your personal data instead takes place on the basis of the UK

GDPR, article 6(1)(b) (contractual obligation, including in order to take steps prior to entering into a contract).

If we process data concerning your health in connection with entering into the employment contract, for example, in order for us to make adjustments to the workplace setup or similar, we will process your sensitive personal data on the basis of UK GDPR, article 9(2)(b) (obligation in the field of employment).

## 4.6 CANDIDATE SEARCH

As part of our recruitment strategy, we actively search for candidates for vacant positions in our company. In this regard, we can process your personal data, which is available on the internet, including professional networking sites such as LinkedIn, for the purpose of assessing whether you are potentially a candidate for a vacant position with us.

If we assess that you are a suitable candidate, we may contact you to encourage you to create a candidate profile in our recruitment system, submit an application, or otherwise initiate a recruitment process. In special cases, the contact is made through an external recruitment agent.

We can process the following ordinary personal data about you:

- Personal details and contact information, including name, address e-mail address and telephone number.
- Details from professional networking sites where you have a profile, such as LinkedIn, including a description of yourself, information about current and previous positions, educational information, qualifications and certificates, status updates ("posts"), and other information that you publish on your profile.
- Information from correspondence with you if we make contact.

Depending on the circumstances, we can share your personal data with our recruitment agent, with whom we collaborate on recruitment matters, as well as with other Ørsted companies.

### Legal basis:

We process your personal data on the basis of GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is – on the basis of publicly available information – to find potential candidates for our vacancies.

### Specific national legal basis:

**Germany:** If we process your personal data in connection with our search for potential candidates for a position in our German organisation, the processing of your personal data instead takes place on the basis of the § 26(1) of the German Federal Data Protection Act (Bundesdatenschutzgesetz (BDSG)).

**United Kingdom:** If we process your personal data in connection with our search for potential candidates for a position in our UK organisation, the processing of your personal data instead takes place on the basis of the UK GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is – on the basis of publicly available information – to find potential candidates for our vacancies.



## 4.7 CANDIDATE DATABASE

You can choose to register in our candidate database if you are interested in us contacting you regarding vacancies that we believe you may be interested in applying for. You can register in the candidate database when you apply for a vacant position or independently of this. You must create a candidate profile (see above under section 4.1), and in the candidate profile you can upload documents and information that we can use to assess whether we should contact you regarding an open position.

We can process the following ordinary personal data about you:

- Personal details and contact information, including name, address, e-mail address, telephone number, country of residence, and nationality.
- Details on your CV such as educational background and job history, including information about current and previous employers, positions, tasks, experiences, competences, qualifications, results, and similar information that you choose to include.
- Any information about vacancies that you have applied for at Ørsted.
- Details of your consent to the storage of your information in the candidate database.

We can share the personal data with other Ørsted companies, and we may allow the data to be accessed by our suppliers (data processors), in particular IT suppliers who assist with technical support.

Legal basis:

We process your personal data on the basis of GDPR, article 6(1)(a) (consent).

Specific national legal basis:

**Germany:** If you register in the candidate database for the purpose of being considered for a vacant position in our German organisation, your personal data will instead be processed on the basis of § 26(2) of the German Federal Data Protection Act (Bundesdatenschutzgesetz (BDSG)).

**United Kingdom:** If you register in the candidate database for the purpose of being considered for a vacant position in our UK organisation, your personal data will instead be processed on the basis of the UK GDPR, article 6(1)(a) (consent).

## 4.8 SURVEY

Following a completed recruitment process, we can – if you are among the candidates who got far in the process or if you have been offered the position in question – invite you to take part in a survey with the aim of receiving feedback about the experience with our recruitment process.

Your survey response is sent to us in anonymized form, and we can therefore not identify whether a given survey response was made by you. In connection with the survey, we therefore only process the following ordinary personal data to be able to send you the invitation to the survey:

- Personal details and contact information, including name and e-mail address.

- Details of the position you have applied for, including the reference number of the position.
- Details of whether you have been offered the position applied for or whether you have been rejected.

We may pass on your personal data to our supplier of the survey system, and we may share aggregated data from the surveys (which does not constitute personal data about you) with other Ørsted companies.

Legal basis:

We process your personal data on the basis of GDPR, article 6(1)(f) (legitimate interest). Our legitimate interest is to be able to receive feedback about experiences with our recruitment process for the purpose of continuous evaluation of the process.

## 5. CONSEQUENCES OF PROCESSING

The processing of your personal data generally takes place solely for the purpose handling a recruitment process that you are a part of, including with the aim of entering into an employment contract. Our processing of your personal data will therefore generally not have negative consequences for you, unless it is established that you have provided incorrect information of such a nature that it leads to a police report, prosecution or the like.

## 6. TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

Ørsted is an international company with presence and activities in several places around the world, and this also impacts the way we recruit. Depending on the circumstances of the individual recruitment and what you specifically consent to, your personal data may therefore be transferred to other Ørsted companies within the Ørsted group and to other recipients in countries outside the EU/EEA ("third countries") in connection with our recruitment activities.

Our legal basis for such transfers to third countries is outlined below.

### 6.1 TRANSFERS TO OTHER ØRSTED COMPANIES

- If, in connection with a job application, you consent to your candidate profile and your application information being made available to our recruitment teams globally, in order to be contacted in relation to other vacancies that we believe are relevant for you to apply for, or if – independently of an application process – you consent to us storing your information in our global candidate database, transfers to other Ørsted companies for the purposes mentioned will take place on the basis of the following transfer basis:
  - Transfers to other Ørsted companies in United Kingdom, South Korea, Japan and Isle of Man: These countries have been deemed by the Commission of the European Union as countries that ensure an adequate level of protection of personal data. Transfers to Ørsted companies in these countries will therefore take place on the basis of GDPR, article 45(1).

- Transfers to other Ørsted companies in the USA, Malaysia, Taiwan, Vietnam and Australia: Ørsted's US companies have not self-certified under the EU-US Data Privacy Framework ("DPF"). Transfers to Ørsted's US companies as well as transfers to Ørsted companies in Malaysia, Taiwan, Vietnam and Australia will therefore take place on the basis of your consent in accordance with GDPR, article 49(1)(a).
- If, in connection with a job application, you give consent that your candidate profile and your application information can only be used in relation to the position you are applying for, including that it can only be accessed by the specific employees who take part in the recruitment process, transfers to other Ørsted companies in third countries will only take place if the position you are applying for is to be part of a globally working department in Ørsted, and if the employee(s) who take part in the recruitment process therefore work(s) for an Ørsted company in a third country. Transfers to other Ørsted companies will in such cases be made on the basis of the following transfer basis:
  - Transfers to other Ørsted companies in United Kingdom, South Korea, Japan and Isle of Man: These countries have been deemed by the Commission of the European Union as countries that ensure an adequate level of protection of personal data. Transfers to Ørsted companies in these countries will therefore take place on the basis of GDPR, article 45(1).
  - Transfers to other Ørsted companies in the USA, Malaysia, Taiwan, Vietnam and Australia: Ørsted's US companies have not self-certified under the DPF. Transfers to Ørsted's US companies as well as transfers to Ørsted companies in Malaysia, Taiwan, Vietnam and Australia will therefore take place on the basis of your consent in accordance with GDPR, article 49(1)(a).

## 6.2 TRANSFERS TO OTHER RECIPIENTS

Transfers to other recipients in third countries, including our partners and suppliers who assist Ørsted's recruitment activities (e.g., recruitment partners and IT providers), will take place on the basis of the following transfer basis:

- Transfers to recipients in Andorra, Argentina, Canada, Faroe Islands, Guernsey, Isle of Man, Israel, Japan, Jersey, New Zealand, South Korea, Switzerland, United Kingdom and Uruguay: These countries have been deemed by the Commission of the European Union as countries that ensure an adequate level of protection of personal data. Transfers to recipients in these countries will therefore take place on the basis of GDPR, article 45(1).
- Transfers to recipients in the USA:
  - If the recipients in the USA have self-certified under the DPF, there will be reliable transfer mechanisms in place for the transfer of personal data, ensuring protection of your personal data in accordance with the GDPR and EU legislation. Transfers to recipients who have self-certified under the DPF will therefore take place on the basis of GDPR, article 45(1).
  - If the recipients in the USA have not self-certified under the DPF, transfers to these recipients will – depending on the specific circumstances of the individual transfers – take place on the basis of the Commission of the European Union's standard

contractual clauses as published by the Commission of the European Union, in accordance with GDPR, article 46(2)(c), or in special cases on the basis of GDPR, article 49(1)(a) (consent), article 49(1)(b) (performance of a contract), or article 49(1)(e) (establishment, exercise or defence of legal claims).

- Transfers to recipients in other third countries: Transfers to recipients in other third countries will – depending on the specific circumstances of the individual transfers – take place on the basis of the Commission of the European Union’s standard contractual clauses as published by the Commission of the European Union, in accordance with GDPR, article 46(2)(c), or in special cases on the basis of GDPR, article 49(1)(a) (consent), article 49(1)(b) (performance of a contract), or article 49(1)(e) (establishment, exercise or defence of legal claims).

You can obtain a copy of Ørsted’s standard contract for transfers that take place on the basis of GDPR, article 46(2)(c) by sending an e-mail to [GDPR.Legal@orsted.com](mailto:GDPR.Legal@orsted.com).

## 7. RETENTION

We adhere to the general principles of data minimization and storage limitation, and we will therefore only retain your personal data for as long as necessary to fulfill the purpose(s) for which the personal data was collected, and as required to comply with applicable law. Subsequently, we will anonymize or delete your personal data.

Your candidate profile, which you create in connection with a recruitment process, is automatically deleted if you have not been logged in – and the profile has thus been inactive – for 6 months. Your personal data contained in your application, your CV and other material we receive and process in connection with the recruitment process is stored until 6 months after the end of the recruitment process, after which time the personal data is deleted.

If you consent to us storing the candidate profile and your application information for a longer period, we can store the candidate profile and application information beyond the 6 months in accordance with what you consent to.

Information that we may collect in connection with a background check is deleted immediately after the background check is completed. Details of your criminal record, which we may in very special cases ask you to show in some countries, will not be stored at all. We only keep a note that a background check has been conducted. If you are not employed, the note is retained until 6 months following the end of the recruitment process, after which time the note is deleted.

If you are employed, relevant information can be transferred to your personnel file, including application material and documentation of a satisfactorily completed background check. The information is then stored in accordance with our retention periods for employee information.

If you participate in a survey, your anonymized response will be deleted after 2 years.

In extraordinary cases, we may retain your personal data beyond the mentioned retention periods, including if necessary to comply with an authority order, or if it is necessary for the establishment, exercise or defence of legal claims.

When we establish our retention periods, we generally apply the following criteria:

- As long as there is an ongoing recruitment process that you are part of.
- As required by legal obligations to which we are subject or become subject.
- As advisable in light of our legal position in order to establish, exercise and defend legal claims.
- As necessary to fulfill our legitimate business needs (e.g., documentation needs).

## 8. YOUR RIGHTS

You have the following rights in relation to the processing of your personal data:

### a. Right of access

You have the right to request confirmation as to whether or not Ørsted processes personal data about you, and, if so, request access to (a copy of) such personal data. This will provide you with an insight into what personal data we process about you as well as information about how we process your personal data.

### b. Right to rectification

You have the right to request that we rectify inaccurate personal data or complete personal data about you that you consider inaccurate or incomplete.

### c. Right to erasure

You have the right to request that we erase your personal data, for example if (1) the personal data is no longer needed in relation to the purpose(s) for which it was collected, or if (2) the personal data that we process is based on your consent and you withdraw your consent.

In certain situations, we will be unable to erase your personal data upon your request. This could be the case, for example, if the personal data is still necessary to process for the purposes for which it was collected, including when Ørsted's interest in processing the personal data exceeds your interest in having the personal data erased, or when Ørsted has a legal obligation to continue to store it.

### d. Right to restriction of processing

If you believe that your personal data is inaccurate, that our processing of your personal data is unlawful, or that we do not need the data for the purpose(s) described, you have the right to request that we restrict the processing of this personal data. You also have the right to request that we halt our processing of your personal data while we assess your request. If you object to our processing of your personal data in accordance with what is described under point f., you can also request that we limit our processing of your personal data while we make our assessment.

### e. Right to withdraw consent

If we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time. If you withdraw your consent, we will stop our processing of your personal data that is based on your consent. The withdrawal of your consent will not affect the lawfulness of the processing that took place prior to your withdrawal of consent.

You can withdraw your consent by sending an e-mail to [GDPR.Legal@orsted.com](mailto:GDPR.Legal@orsted.com).

**f. Right to object**

You have the right to object to the processing of your personal data as follows:

- If the processing of your personal data takes place on the basis of GDPR, article 6(1)(f) (see section 4), you have the right to object at any time to our processing of your personal data by referring us to reasons relating to your particular situation.
- If your personal data is processed for direct marketing purposes, you have the right to object at any time to our processing of your personal data for such marketing.

**g. Right to data portability**

You have the right to request a copy of the personal data that we process about you to fulfill a contract with you or based on your consent, in a structured, commonly used, and machine-readable format, and to require that we transfer this personal data to another data controller where this is technically feasible. This will enable you to use the personal data elsewhere.

**h. Right to lodge a complaint with a data protection supervisory authority**

If you are dissatisfied with our processing of your personal data, you can lodge a complaint with a data protection supervisory authority. In Denmark, this authority is the Danish Data Protection Agency (Datatilsynet). You can find the contact information for Datatilsynet and the procedure for lodging a complaint at [www.datatilsynet.dk](http://www.datatilsynet.dk).

You can exercise your rights (a.-g.) by sending an e-mail to [GDPR.Legal@orsted.com](mailto:GDPR.Legal@orsted.com).

There may be conditions or limitations in relation to the exercise of your rights. Therefore, it is not certain, for example, that you have the right to data portability in the specific case. It depends on the specific circumstances in connection with the processing activities.

## **9. CHANGES**

This privacy policy replaces all previous versions. We regularly review this privacy policy, and we reserve the right to update and change it. In the event of significant changes, we will inform you in an appropriate manner.

*Last updated: 10 May 2024*

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