



DATA GOVERNANCE

This Policy outlines the core principles for business conduct within the GAZELLE WIND POWER Group regarding our responsibility toward Data Governance and the protection of data privacy.

Disclaimer:

This policy extends to the operations and business activities of GAZELLE and its affiliates throughout the world, as well as to GAZELLE employees wherever they live and work.

In case of conflict between the applicable laws of a country and GAZELLE's policies, the law becomes precedence. It lies within the responsibility of the discoverer to make GAZELLE aware of such differences. In cooperation with GAZELLE's legal team conflict resolution needs to be pursued. Please use GAZELLE's compliance notification system compliance@gazellewindpower.com to reach out.

Subject to changes and errors.



DATA GOVERNANCE

This Policy states the core principles values of GAZELLE WIND POWER regarding our corporate responsibility toward data governance and privacy protection for our employees, suppliers, and stakeholders.

1 General principles

GAZELLE is dedicated to fast, agile execution and sustainability. We are committed to setting ambitious targets, continuing our path toward reducing our environmental footprint and contributing to sustain our natural resources for our future generations. We take our responsibility for data governance equally importantly and are acting in accordance with Sarbanes–Oxley Act, Basel I, Basel II, HIPAA, GDPR, cGMP and are guided by ISO/IEC 38500.

The key focus areas of data governance include availability, usability, consistency, data integrity and data security. We have established processes to ensure effective data management throughout the entire organization without compromising data privacy.

We therefore expect our business partners, employees, and stakeholders:

- To act with integrity toward our data management regulations
- To comply with the data protection laws applicable to us
- To embed this commitment into their business operations and
- To actively reduce risk of exposure to data leakages, data privacy breaches and regulatory fines.

2 Data management

Management System At GAZELLE we demonstrate our accountability toward data privacy and data management by measuring the effectiveness of our actions, make them part of our strategic decision making and our daily life routines.

Definition We broadly define data as documentation and information received directly or indirectly from Customers and suppliers, whether in paper, verbally or in digital form, data generated, processed, or modified internally to support



business operations, strategic decision making and product improvement activities.

In general, all documentation, information and data provided by Customer are confidential; labelling is not required to mark data as confidential.

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| KPIs | Transparency, traceability, impact measurements, continuous improvement and communication of our regulations and policies are part of our efforts to keep data accurate and safe. |
| Responsibility | Accountability and responsibilities of data quality are clearly defined and apply to all our employees ensuring we are managing the operational, financial and ethical risk of adverse effects of poor data quality and that we increase consistency and confidence in decision making on all levels. |
| Control | Every Gazelle employee shall in relation to the Company Personal Data and Data Regulations guided by EU GDPR rules minimize the risk of varying likelihood and severity for the rights and freedoms of natural persons exposure. Technical and organizational measures to ensure a level of security appropriate to that risk, including, as appropriate, the measures referred to in Article 32(1) of the GDPR shall be taken and continuously improved. |

3 Data quality

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| Life Cycle | At GAZELLE we demonstrate our accountability toward data privacy and data management by measuring the effectiveness of our actions, make it part of our strategic decision making and our daily life routines. |
| Master data | Our Master Data Management approach supports operational execution and risk management at all levels of the organization, minimizing the limiting effects of poor data quality and ensuring that the data collected, generated, processed can be used by the entire organization – in dependence to their information security level. |
| Organization | In our organization we assigned responsibilities to keep track of our efforts toward achieving our data quality goals at all levels from Top Management to Field Service and Product Design. |
| Control | Throughout the complete lifecycle of the data, and data controls are implemented that support business objectives. |



4 Data privacy

Personal Data We may collect or receive personal information for several purposes connected with our business operations and we are committed to the security of personal data. Appropriate security measures have been taken to limit abuse of and unauthorised access to personal data. This ensures that only the necessary persons with given information security level have access to your data and that access to the data is protected

Protection Data Protection Impact Assessments and consultancy shall provide reasonable assistance to the Company with any data protection impact assessments, and prior consultations with Supervising Authorities or other competent data privacy authorities, which Company reasonably considers to be required by article 35 or 36 of the GDPR or equivalent provisions of any other Data Protection Law, in each case solely in relation to Processing of Company Personal Data by, and taking into account the nature of the Processing and information available to, the Contracted Processors.

Our EHS Security Guidelines are also capturing continuous improvement of data security, defining, and verifying the requirements for data distribution based on internal information access levels on need-to-know basis.

We verify whether and what personal data we have saved about you and to receive copies of these data, process requests to correct, supplement or the deletion of personal data that are wrong or are not processed in a legally compliant manner. Undertake activities to restrict processing of your personal data, execute revocations regarding personal data

Third Parties At all times we to know the identity of third parties to whom your personal data are transmitted and file an appeal to the data protection authority if necessary.

Retention Generally, data is stored if the statutory retention obligations exist or the retention is necessary to meet our statutory tasks, and beyond this if guarantee, warranty, or limitation periods have not yet expired. As a fundamental rule, data will be stored by us until the termination of the business relationship or beyond if this is necessary to meet our statutory obligations, or until the termination of relevant guarantee, warranty, limitation or termination of relevant statutory retention periods or any legal disputes in which the data are required as evidence.



5 Information architecture

Infrastructure Gazelle collaborates with suppliers which were selected based on their data integrity and security measures to keep data and information safe. Any active supplier needs to pass our qualifying requirements and will be constantly evaluated by our team of experts through performance measurements, frequency of security updates, latest market developments and threats, and accountability toward data privacy matters.

Security Level In our organization information and data is shared on a need-to-know basis only and access restricted based on roles & responsibilities within our enterprise. In assessing the appropriate level of security, access to data and information shall take account the risks that are presented by processing and modification of such. All team members are bound to raise concerns in the unlikely event data and information is not protected to its fullest. These roles are also enabling us to better plan, execute and improve over time our own business operations.

6 Data subject rights

Report Processing and possession of data Processor shall assist the company by implementing appropriate technical and organizational measures, insofar as this is possible, for the fulfilment of the Company obligations, as reasonably understood by Company, to respond to requests to exercise Data Subject rights under the Data Protection Laws.

Processor shall: promptly notify Company if it receives a request from a Data Subject under any Data Protection Law in respect of Company Personal Data; and ensure that it does not respond to that request except on the documented instructions of Company or as required by applicable laws to which the Processor is subject, in which case Processor shall to the extent permitted by Applicable Laws inform Company of that legal requirement before the Contracted Processor responds to the request.

7 Digital collaboration

Cooperation Gazelle promotes digital collaboration and usage of IT software tools to collaborate with its customers, suppliers, and employees.



Emission free This approach is in line with our core value to reduce our own carbon footprint through limiting carbon emissions. Innovative digital tools support us on this attempt, while we do also understand that direct relationship building in person is equally important to drive business success.

8 Report

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| Report | <p>If you are not satisfied with the way in which we handle (a complaint about) the processing of your personal data, you have the right to submit a complaint to the Data Protection Authority and we encourage you to help us resolve the issue by reaching out to us:</p> <p>Gazelle Wind Power Limited Registered Office: Barrow Street 4 South Bank House, 6th Floor, D04 TR29, Dublin Ireland</p> <p>Website: https://gazellewindpower.com Email: gdpr@gazellewindpower.com Phone: +35 319 609 117</p> |
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Visit our website
[Gazellewindpower.com/integrity](https://www.gazellewindpower.com/integrity)

You'll find more information including:

- Our management approach
- Sustainable governance
- Policies and commitments
- Stakeholder value
- Technological advantage
- How to raise a concern

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