

Data Classification and Handling Policy

This policy applies to all persons working with or for Invinity in any capacity.

Invinity confirms that it has in place, and will maintain, the human and technical resources necessary to ensure compliance with the UK General Data Protection Regulation (UK GDPR) and to protect the rights of data subjects.

The Company's Data Classification and Handling Policy establishes the following measures:

- **Data Classification & Handling:** All information assets are classified (Public, Confidential, Restricted) and handled according to sensitivity and risk. Owners are responsible for correct classification and labeling.
- **Technical Controls:** Confidential and Restricted data are encrypted in transit and at rest, where practicable. Access is strictly controlled based on "need-to-know" and "least privilege" principles. Approved cloud storage and regular encrypted backups are used for business data.
- **Data Subject Rights:** Data subjects are entitled to access, restrict processing, erasure, rectification, portability, and objection. Our privacy policy publicly identifies these rights, and requests are managed according to documented procedures.
- **Secure Disposal:** Confidential and Restricted data are securely deleted or destroyed, with disposal of Restricted data logged. Hard copies are shredded, and electronic media is securely erased or destroyed.
- **Compliance & Review:** Compliance is monitored through audits and tool reports. Exceptions require approval and documentation. Violations are subject to HR policy.
- **Personal Data Handling:** Personal data is only collected for legitimate business needs, with risk analysis prior to processing. Personal data is always encrypted and handled to preserve the rights and freedoms of data subjects.

These measures ensure ongoing confidentiality, integrity, availability, and resilience of our processing systems and services, and support compliance with UK data protection law.

Data Classification and Handling Policy

Full Statement

Invinity Energy Systems is committed to protecting your privacy. This Privacy Policy explains how we collect and use your personal data and which rights and options you have in this respect.

Who is responsible for your personal data?

Invinity Energy Systems is responsible for your data.

Which personal data to we collect?

The personal data we collect may include:

- Contact information, such as your name, job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address and CVs when you are applying for a role at Invinity Energy Systems;
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information;
- Further business information necessarily processed in a project or client contractual relationship with Invinity Energy Systems or voluntarily provided by you, such as instructions given, payments made, requests and projects;
- Information collected from publicly available resources, data bases and credit agencies;
- Special categories of personal data. In connection with the registration for and provision of access to an event or seminar, we may ask for information about your health for the purpose of identifying and being considerate of any disabilities or special dietary requirements you may have. Any use of such information is based on your consent. If you do not provide any such information about disabilities or special dietary requirements, we will not be able to take any respective precautions;
- Other personal data regarding your preferences where it is relevant to legal services that we provide; and/or
- Details of your visits to our premises.

From time to time, it may include personal data about your membership of a professional or trade association or union, health personal data, details of dietary preferences when relevant to events to which we invite you and details of any criminal record you may have.

How do we collect your personal data?

We may collect personal data about you in a number of circumstances, including:

- When you or your organisation make contact requesting further information about our products or use any on-line services;
- When you or your organisation browse, make an enquiry or otherwise interact on our website;
- When you attend a seminar or another Invinity Energy Systems event or sign up to receive personal data from us, including training;
- When you apply for a role at Invinity Energy Systems; or
- When you or your organisation offer to provide or provide services to us.

In some circumstances, we collect personal data about you from a third-party source. For example, we may collect personal data from your organisation, other organisations with whom you have dealings, government agencies, a credit reporting agency, an information or service provider or from a publicly available record.

Are you required to provide personal data?

As a general principle, you will provide us with your personal data entirely voluntarily; there are generally no detrimental effects for you if you choose not to consent or to provide personal data. However, there are circumstances in which Invinity Energy Systems cannot take action without certain of your personal data, for example because this personal data is required to process your instructions or orders, provide you with access to a web offering or newsletter or to carry out a legally required compliance screening. In these cases, it will unfortunately not be possible for us to provide you with what you request without the relevant personal data and we will notify you accordingly.

For which purposes will we use your personal data?

We may use your personal data for the following purposes only ("Permitted Purposes"):

- Providing services or things you may have requested, including online or technology services or solutions as instructed or requested by you or your organisation;
- Managing and administering your or your organisation's business relationship with Invinity Energy Systems, including processing payments, accounting, auditing, billing and collection, support services;

- Compliance with our legal obligations (such as record keeping obligations), compliance screening or recording obligations (e.g. under antitrust laws, export laws, trade sanction and embargo laws, for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes), which may include automated checks of your contact data or other information you provide about your identity against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match or recording interaction with you which may be relevant for compliance purposes;
- To analyse and improve our services and communications to you;
- Protecting the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- For insurance purposes;
- For monitoring and assessing compliance with our policies and standards; To identify persons authorised to trade on behalf of our clients, customers, suppliers and/or service providers;
- To comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- To comply with court orders and exercises and/or defend our legal rights; and
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

Where you have expressly given us your consent, we may process your personal data also for the following purposes:

- Communicating with you through the channels you have approved to keep you up to date on the latest developments, announcements, and other information about Invinity Energy Systems services, products and technologies (including briefings, newsletters and other information) as well as Invinity Energy Systems events and projects;
- Customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events; or
- Collecting information about your preferences to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

- With regard to marketing-related communication, we will – where legally required – only provide you with such information after you have opted in and provide you the opportunity to opt out anytime if you do not want to receive further marketing-related communication from us. We will not use your personal data for taking any automated decisions affecting you or creating profiles other than described above.

Depending on for which of the above Permitted Purposes we use your personal data, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organisation;
- To comply with our legal obligations (e.g. to keep pension records or records for tax purposes); or
- Because processing is necessary for purposes of our legitimate interest or those of any third-party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

In addition, the processing may be based on your consent where you have expressly given that to us.

With whom will we share your personal data?

We may share your personal data in the following circumstances:

- We may share your personal data between the Invinity Energy Systems entities on a confidential basis where required for the purpose of providing products or services and for administrative, billing and other business purposes. A list of the locations where Invinity Energy Systems has entities can be found on our website;
- We may disclose your contact details on a confidential basis to third parties for the purposes of collecting your feedback on the firm's service provision, to help us measure our performance and to improve and promote our services;
- We may share your personal data with companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared;
- We may share your personal data with any third party to whom we assign or novate any of our rights or obligations;
- We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the

establishment, exercise or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;

- We may also instruct service providers within or outside of Invinity Energy Systems, domestically or abroad, e.g. shared service centres, to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. Invinity Energy Systems will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers;
- We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Otherwise, we will only disclose your personal data when you direct us or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

Personal data about other people which you provide to us

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Policy. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

Keeping personal data about you secure

We will take appropriate technical and organisational measures to keep your personal data confidential and secure in accordance with our internal procedures covering the storage, disclosure of and access to personal data. Personal data may be kept on our personal data technology systems, those of our contractors or in paper files.

Transferring your personal data abroad

Invinity Energy Systems is a globally active company. We may transfer your personal data abroad if required for the Permitted Purposes as described above. This may include countries which do not provide the same level of protection as the laws of your home country (for example, the laws within the European Economic Area).

All Invinity Energy Systems offices throughout the world will at all times ensure a level of data protection at least as protective as that required in the European Economic Area.

When doing so we will comply with applicable data protection requirements and take appropriate safeguards to ensure the security and integrity of your personal data.

Updating personal data about you

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to [info\(at\)invinity.com](mailto:info@invinity.com). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.

For how long do we retain your personal data?

Your personal data will be deleted when it is no longer reasonably required for the Permitted Purposes or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. We will, in particular, retain your personal data where required for Invinity Energy Systems to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A “cookie” is a small text file which is stored on the user’s hard drive or mobile device. Cookies perform a number of functions associated with browsing websites and are used for a variety of different purposes, such as tracing users from page to page on an internet site, thereby enhancing a user’s browsing experience. They are generated by web servers when the user enters an internet page, and are passed to the user’s computer or mobile device and stored for subsequent future access.

We only use cookies in certain areas of this website. You are not obliged to accept a cookie and you can modify your browser so that it will not accept cookies. However, if you do so this may affect your browsing experience and certain functions within the website may not work.

Your rights

Subject to certain legal conditions, you have the right to request a copy of the personal data about you which we hold, to have any inaccurate personal data corrected and to object to or restrict our using your personal data. You may also make a complaint if you have a concern about our handling of your personal data.

If you wish to do any of the above, please send an email to [info\(at\)invinity.com](mailto:info@invinity.com). We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your data, and for any additional copies of the personal data you request from us.

We will consider any requests or complaints which we receive and provide you with a response in a timely manner. If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator. We will provide you with details of your relevant regulator upon request.

Updates to this privacy policy

This Privacy Policy was last updated in March 2020. We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.