



# Ørsted A/S - Privacy policy for shareholders, etc.

This privacy policy applies to the processing of personal data about shareholders, proxies and advisors in connection with registration in the register of shareholders and convening and holding of general meetings. The purpose of this privacy policy is to describe how Ørsted A/S ("Ørsted", "we") collects and processes your personal data.

## 1.1 Data controller

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

### Ørsted A/S

CVR-nummer: 36 21 37 28  
Kraftværksvej 53  
7000 Fredericia  
Tel. + 45 99 55 11 11  
Info@orsted.com

## 1.2 Processing activities

At Ørsted, we collect only necessary data about you. In the table below, we describe how we process your personal data. We encourage you not to submit or inform us about sensitive data or your civil registration (CPR) number.

Purpose and sources	Categories of personal data	Legal basis	Erasure
<p><b>#1</b></p> <p><b>Registration of shareholders in the register of shareholders and on the shareholder portal</b></p> <p>Ørsted processes your personal information in order to maintain an updated, statutory register of shareholders.</p> <p>Ørsted also processes your personal data to contact you if necessary in relation to your registration in the statutory register of shareholders and shareholder portal.</p> <p><b>We receive information from the following sources:</b></p> <ul style="list-style-type: none"><li>• Directly from you, including through our shareholder portal.</li><li>• VP Securities.</li></ul>	<p><b>We process the following data about you:</b></p> <p>General personal data:</p> <ul style="list-style-type: none"><li>• name</li><li>• gender</li><li>• email address</li><li>• home address</li><li>• telephone number</li><li>• portfolio of shares</li><li>• voting rights</li><li>• date of acquisition, sale or pledge of share</li><li>• username and password</li><li>• account number with VP Securities</li><li>• custodian bank</li><li>• investor ID</li><li>• investor group</li></ul>	<p><b>We process your personal data as described, in accordance with:</b></p> <ul style="list-style-type: none"><li>• GDPR article 6 (1) (c) (compliance with legal obligations in section 50 of the Danish Companies Act).</li><li>• GDPR article 6 (1) (f) (legitimate interests). Our legitimate interest is to be able to respond to your request and to communicate with you.</li></ul>	<p><b>We retain your personal data as long as it is necessary for the purposes mentioned.</b></p> <ul style="list-style-type: none"><li>• We retain your general personal data for up to 5 years plus current financial year after you no longer own shares in Ørsted A/S.</li></ul>

## #2

**Convening and holding of general meetings**

Ørsted processes your personal data for the purpose of inviting you to general meetings and enabling you to exercise your rights at such general meetings, issue proxies and vote by post.

Furthermore, we use the information to issue ballot papers and admission cards to shareholders and any advisors.

If you are an advisor to a shareholder, we will process your information in order for you to have access to attend the general meeting.

**We receive information from the following sources:**

- Directly from you, including when you submit information via our shareholder portal, see above.
- The register of shareholders.

**We process the following data about you:**

General personal data:

- name
- email address
- home address
- attendance at general meeting
- advisor's attendance at general meeting
- proxies
- votes cast, including written votes
- portfolio of shares

**We process your personal data as described, in accordance with:**

- GDPR article 6 (1) (c) (compliance with legal obligations in section 93 of the Danish Companies Act).
- GDPR article 6 (1) (f) (legitimate interests). Our legitimate interest is to be able to respond to your request and to communicate with you.

**We retain your personal data as long as it is necessary for the purposes mentioned.**

- We retain your general personal data for up to 5 years plus current financial year after you no longer own shares in Ørsted A/S.
- Registrations, proxies and written votes are retained for up to 5 years plus current financial year after the general meeting.
- Material that documents the company's history, including notice to convene general meetings with agenda and complete proposals, decisions made, etc. is retained as long as Ørsted A/S exists.

## #3

**Handling questions and proposals**

Ørsted processes your personal data to handle questions and proposals submitted prior to the general meeting, handling of questions and exercising the right to speak at the general meeting as well as preparation of minutes of the general meeting.

If questions are answered in writing prior to the general meeting, we will process your information in order to be able to present questions, answers and name of the person who put forward the question at the general meeting. If proposals are included on the agenda, we will process your personal data (your name and proposal) on the forms for appointment of proxy or written voting as well as on the agenda. Forms, written votes and agenda, including complete proposals, are published on Ørsted's website. Finally, we will process your personal data when preparing and issuing the minutes of the general meeting.

**We receive information from the following sources:**

- Directly from you.
- The register of shareholders.

**We process the following data about you:**

General personal data:

- documentation of your status as a shareholder or proxy
- name
- the content of your question
- the content of your proposal
- the content of your opinions expressed during the general meeting

**We process your personal data as described, in accordance with:**

- GDPR article 6 (1) (c) (compliance with legal obligations in sections 78, 90 and 102 of the Danish Companies Act).
- GDPR article 6 (1) (f) (legitimate interests). Our legitimate interest is to be able to identify you as a shareholder or proxy so that you may exercise your right to submit proposals and ask questions prior to and during the general meeting and speak at the general meeting.

**We retain your personal data as long as it is necessary for the purposes mentioned.**

- We retain your general personal data for up to 5 years plus current financial year after you no longer own shares in Ørsted A/S.
- Registrations, proxies and written votes are retained for up to 5 years plus current financial year after the general meeting. Material that documents the company's history, including notice to convene general meetings with agenda and complete proposals, decisions made, etc. is retained as long as Ørsted A/S exists.

**#4****Audio and/or visual recordings**

General meetings are audio and/or visually recorded.

The recordings include the general meeting podium and rostrum.

If you are identifiable on the recording, your personal data will be processed by us.

We use the recordings to prepare the minutes.

Ørsted can also process your personal data in case the general meeting is held electronically.

**We receive information from the following sources:**

- Professional photographers etc. hired to make such recordings.

**We handle the following categories of personal data about you:**

General personal data:

- audio and/or visual recordings, including the information included therein

**We process your data on the following legal basis:**

- GDPR article 6 (1) (f) (legitimate interests). Our legitimate interest in processing the recordings is to use them to prepare the minutes and to record the general meeting when it is held electronically.

**We will retain personal data for as long as it is necessary for the purposes mentioned.**

- We retain audio and/or visual recordings until the minutes have been approved.

**1.3 Recipients of your personal data**

Depending on the circumstances, Ørsted may share your data with:

- Suppliers, including IT suppliers.
- The public through publication on the website [www.orsted.com](http://www.orsted.com) in accordance with applicable rules.
- Nasdaq Copenhagen A/S.
- Public authorities, e.g. the Danish Business Authority.

**1.4 Transfer to third countries**

In certain situations, Ørsted will transfer personal data to countries outside EU/EEA.

Such transfers to third countries will be made on the following legal basis:

- 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: Ørsted 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@orsted.com](mailto:info@orsted.com).

**1.5 Your rights**

When we process your data, you have the following general 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 of the processing performed before 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 Danish Data Protection Agency, cf. clause 1.6.

You can exercise your rights by contacting us at the contact information provided in clause 1.6.

These rights may be conditioned or restricted. Therefore, you may, for example, not have the right to have your personal data erased in specific cases. It depends on the specific circumstances of the processing operations.

#### **1.6 Contact Ørsted regarding the processing of personal data**

If you wish to contact Ørsted regarding our processing of your personal data, please write to [info@orsted.com](mailto:info@orsted.com) or call us on +45 99 55 11 11

If you are unhappy with our response, you can lodge a complaint with your local data protection authority.

In Denmark, the supervisory authority is the Danish Data Protection Agency.

Telephone: +45 33 19 32 00

E-mail address: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

Website: [www.datatilsynet.dk](http://www.datatilsynet.dk)

#### **1.7 Changes in our privacy policy**

This privacy policy replaces all previous versions. It will be necessary to update and amend this policy on an ongoing basis, and we thus reserve the right to update and amend it. In the event of an important amendment, we will notify you at [orsted.com](http://orsted.com) or send an email if we deem this necessary.

*This privacy policy was last updated in March 2022.*