



HANNON Group Privacy Policy (External Parties)

The protection of your personal data is important to the HANNON Group. Your trust is our priority. Accordingly, we treat your personal data as confidential and in accordance with applicable data protection regulations and this Group Privacy Policy ("*Privacy Policy*").

This policy explains how HANNON collects, uses, shares, and protects personal data in the course of its operations. It covers data collected through websites, communications, service delivery, and other interactions. It also outlines the use of cookies and similar technologies.

HANNON may update this *Privacy Policy* periodically. Updated versions of this *Privacy Policy* will be published on our website. We encourage you to review the current version regularly.

This *Privacy Policy* sets out how personal data is collected and processed by companies within the HANNON Group. A current list of the entities covered by this policy is available upon request by contacting gdpr@hannontransport.com.

1. Name and Address of the Data Controller

- 1.1. The data controllers for personal data collected by the HANNON Group — including through websites, email, services, and other business interactions — are the relevant legal entities within the Group. A full list of these entities is available upon request by contacting gdpr@hannontransport.com.
- 1.2. For all data protection matters, please contact gdpr@hannontransport.com

2. Contact Details of the Data Protection Officer

- 2.1. You may reach the Data Protection Officer (DPO) by email at gdpr@hannontransport.com

3. General Information on Data Processing

3.1. Scope of Personal Data Collection

3.1.1. We process personal data when:

- a) You use our websites;
- b) You submit enquiries or contact forms;
- c) You request services or information; or
- d) You provide data in the course of business engagement;

3.1.2. The types of personal data we may process include:

- a) Identity Data (e.g., name, title, date of birth)
- b) Contact Data (e.g., address, email, phone number)
- c) Financial Data (e.g., payment details, billing address)
- d) Transaction Data (e.g., purchase history, orders, service usage)
- e) Technical Data (e.g., IP address, browser type, device information)
- f) Marketing and Communications Data (e.g., preferences for receiving communications)

3.1.3. We may also process anonymised and aggregated data for statistical and service improvement purposes.

3.2. Legal Basis for Processing

3.2.1. We process your personal data on the following legal grounds:

- a) Consent – Art. 6(1)(a) GDPR
- b) Contractual necessity – Art. 6(1)(b) GDPR
- c) Legal obligation – Art. 6(1)(c) GDPR
- d) Legitimate interest – Art. 6(1)(f) GDPR

3.3. Data Retention

3.3.1. Personal data is retained only as long as necessary for the stated purposes, or as required by law. Data is deleted or anonymised when no longer needed.

4. Website Access and Log Files

- 4.1. When you visit our websites, certain technical data is collected automatically:
 - a) Browser type and version
 - b) Operating system
 - c) IP address
 - d) Date and time of access
 - e) Referring URL and visited pages.
- 4.2. This data is stored in server log files for system integrity, performance optimisation, and IT security.
- 4.3. Legal basis: Art. 6(1)(f) GDPR (legitimate interest)

5. Use of Cookies

- 5.1. We use cookies and similar technologies on our websites. These cookies may be:
 - a) Necessary cookies – for site functionality and security
 - b) Performance cookies – to analyse usage
 - c) Marketing cookies – to support online campaigns (only with your consent)
- 5.2. You can manage your cookie preferences via our cookie banner or your browser settings.
- 5.3. Legal basis: The use of cookies is based on Art. 6(1)(f) GDPR for necessary cookies, and Art. 6(1)(a) GDPR (with consent) for all other types of cookies.

6. Contact Forms and Email Communication

- 6.1. When you contact us via forms or email, we collect:
 - a) Name, email, phone, and company details
 - b) Content of your message
 - c) Technical metadata (e.g. time, IP, browser)
- 6.2. This data is used solely to respond to your enquiry or fulfil a request.
- 6.3. Legal basis: The processing of data via contact forms or email is based on Art. 6(1)(a) GDPR (consent), Art. 6(1)(b) GDPR (pre-contractual/contractual communication), and Art. 6(1)(f) GDPR (legitimate interest).

7. Disclosure of Personal Data

- 7.1. We do not sell your data. We may share personal data with:
- a) Affiliated HANNON entities
 - b) Service providers under contract
 - c) Customs or regulatory authorities where required
 - d) Legal or law enforcement bodies (where legally obligated)
 - e) Third parties in connection with a business transfer, such as a merger, acquisition, restructuring, or sale of assets, in which case personal data may be transferred as part of the transaction.
- 7.2. Transfers outside the UK or EU are subject to appropriate safeguards (e.g. Standard Contractual Clauses).

8. Your Rights as a Data Subject

- 8.1. You have the following rights under the GDPR:
- a) Right to access your data
 - b) Right to rectification
 - c) Right to erasure ("right to be forgotten")
 - d) Right to restrict processing
 - e) Right to object
 - f) Right to data portability
 - g) Right to withdraw consent (if applicable)
- 8.2. To exercise these rights, contact: gdpr@hannontransport.com
- 8.3. You also have the right to lodge a complaint with your local data protection authority, such as:
- a) UK: Information Commissioner's Office (ICO) – www.ico.org.uk
 - b) Ireland: Data Protection Commission – www.dataprotection.ie
 - c) Netherlands: Autoriteit Persoonsgegevens – www.autoriteitpersoonsgegevens.nl
 - d) France: CNIL – www.cnil.fr

9. Security

- 9.1. The HANNON Group implements appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.
- 9.2. Security measures are regularly reviewed and updated in line with technological developments, industry standards, and regulatory requirements.
- 9.3. Access to personal data is restricted to authorised personnel who are bound by confidentiality obligations.

10. Changes to This Privacy Policy

- 10.1. We reserve the right to update this policy at any time. Updated versions will be published on our website.