

SUNNICA PRIVACY POLICY

1. HOW WE USE YOUR DATA

We are committed to protecting your privacy. It is important that you understand how we look after your personal data and how we make sure that we meet our legal obligations to you under the UK data protection rules (the "**Data Protection Laws**"). This privacy policy outlines how Sunnica Ltd will use, store and share your personal data, and supplements any other fair processing or privacy notices provided to you from time to time.

If you have any questions in relation to this policy or generally how your personal data is processed by us please contact us at: 2 Crossways Business Centre, Bicester Road, Aylesbury, Buckinghamshire, HP18 0RA United Kingdom or by email at info@sunnica.co.uk.

This policy applies to any personal data that we collect about you when you:

- engage with the application, consultation or any future development process relating to our proposal to establish a new solar energy farm and battery storage facility connecting to the Burwell National Grid Substation in Cambridgeshire (the "**Sunnica Energy Farm**");
- visit our website www.sunnica.co.uk (our "**website**").

2. WHO ARE WE?

In this privacy policy, the terms "**we**", "**our**", and "**us**" are used to refer to Sunnica Limited (Company No. 08826077), whose registered office is at 2 Crossways Business Centre, Bicester Road, Aylesbury, Buckinghamshire, HP18 0RA United Kingdom.

We are a controller of your information which means that we are responsible for looking after it. We will use your personal data fairly, lawfully and in a transparent manner, and in accordance with the Data Protection Laws.

3. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We may collect personal information relating to you such as your name, contact details (including your address, telephone number and e-mail address, PinPoint user details), title, date of birth, age, bank details (when needed to make payments) and occupation. This data is only collected when it is needed for a clear purpose, as described below (see section 5).

We may also collect property-specific details (including details of your tenure, relationship with the tenure holder, and Unique Property Reference Number which identifies addresses associated with land and any correspondence you send to us, including opinions you may express for consultation purposes).

This information is collected directly from you or it may be obtained from third parties (see section 4 for a description of the sources of the information).

In addition, each time you visit our website, we may automatically collect information and personal data about your visit, namely, your IP address, operating system, device model, browser type and version, cookie ID, language setting, webpages visited, time and date of visit, time spent on pages, time zone setting and location, browser plug-in types and versions, and click-through information (referring sites and links clicked). We refer to this as "**Usage Data**".

4. WHERE DO WE GET THIS INFORMATION FROM?

We collect some of your information directly from you, either through information that you give to us or information that we collect during your visits to our website or through your communications with us. We also may obtain some information from other third parties.

Information that you give us	<p>You may share personal data about yourself and your circumstances in relation to Sunnica Energy Farm by giving us information about yourself in any communications with us either by telephone, e-mail, post or otherwise (including face-to-face meetings, home visits and/or site visits).</p> <p>You are not obliged to provide your personal data to us. However, if you do not provide your personal data to us, we may not be able to respond to your queries or comments relating to the Sunnica Energy Farm proposal.</p>
Information that we collect about you	<p>We may also collect personal data about you through public consultation activities. This includes through:</p> <ul style="list-style-type: none"> • sign-in sheets at public consultation events; • registrations via Zoom for webinars; • paper consultation questionnaires; • online consultation questionnaires; • emails to the project inbox, info@sunnica.co.uk; and • records of calls to the project Freephone 0808 168 7925. <p>In addition, we also collect Usage Data (as described in section 3) automatically when you visit our website. We collect this data by using cookies and similar technologies.</p>
Information that we receive from other sources	<p>We may also receive the personal data described in section 3 from third parties who are involved in relation to our proposals for Sunnica Energy Farm, namely:</p> <ul style="list-style-type: none"> • AECOM Infrastructure & Environment UK Limited, engaged as planning and environmental consultants and to provide the virtual online exhibition website. The privacy policy can be found here: https://aecom.com/privacy-policy/; • SEC Newgate UK Limited, engaged as public relations and communications consultants. The privacy policy can be found here: https://www.secnewgate.com/privacy-policy/; and • WSP UK Limited, engaged as land agency and referencing consultants. The privacy policy can be found here: https://www.wsp.com/en-GL/legal/privacy-policy. <p>We may also obtain personal data which is publicly available through the HM Land Registry website or 192.com.</p>

5. WHY DO WE NEED YOUR INFORMATION?

The general purpose for which we use your information is to develop and operate the Sunnica Energy Farm project, including by performing our legal obligations in relation to our planning application. Further details of our application process including the associated timescales can be found on our website.

We will use your personal information for the following:

- 5.1.1 in order to pursue our application proposing the development of Sunnica Energy Farm. We will use your personal information in development consultations and to ensure your personal interest in the development is identified, secured, and communicated to relevant organisations;
- 5.1.2 provide you with information and engage with you in the planning, consultation and application process relating to Sunnica Energy Farm; and
- 5.1.3 following determination of the application, to engage with you in any appeals and/or development activities associated with Sunnica Energy Farm, including the payment of compensation events, such as land access.

With respect to the Usage Data we collect when you visit our website, we use this data to (i) provide you with the website; and to (ii) help ensure the effectiveness of our consultation in relation to the project, by understanding how many individuals visit our website and how they use our website (such information may help us identify potential improvements to the website and/or the consultation process which may make the consultation process more effective).

5.2 Basis for using your information

The GDPR sets out a number of possible legal bases of processing. Personal data may only be processed if one of these legal bases applies.

One of these legal bases is referred as “legitimate interests”. This applies where the processing is necessary for legitimate interests which are not outweighed by the data subject's interests, rights and freedoms. We do not need consent where this legal basis applies.

We use your personal data as set out in this privacy policy for the legitimate interests of our business to enable us to develop our proposals (including by completing surveys), submit our application in relation to the development of Sunnica Energy Farm, and carry out development and construction after we have obtained the necessary consent.

As indicated below, we may share your personal data with our joint venture partners and their contractors, for the same purpose and on this same legal basis of processing.

Where we collect data using cookies and the processing of such data is strictly necessary to provide you with our website, we process this data on the basis of the legitimate interests described above, as well as our legitimate interest to operate the website. We do not need consent to collect data using cookies which are essential to the operation of the website.

Where we collect data using cookies and we process such data to measure the effectiveness of our consultation in relation to the project, this is not strictly necessary to provide our website and we only collect and process such data if you give us consent when you visit the website. You have no obligation to give such consent and you are free to use the website even if you refuse consent. You may also withdraw consent at any time although this would not affect the validity of any processing previously carried out with your consent.

You may also set your browser to refuse all cookies or to indicate when cookies are used by a website, through your browser's settings. However, please note that this method would also block cookies which are necessary to provide you with certain features of the website therefore if you use this method, you may not be able to use some parts of the website.

In addition, we also use your personal information in order to comply with and/or fulfil our obligations under applicable laws and regulations, as may apply in relation to the Sunnica Energy Farm proposals and development. "Compliance with legal obligations" is also a legal basis of processing under the GDPR.

6. WHO DO WE SHARE YOUR INFORMATION WITH?

We may share your information with our joint venture partners and their contractors but only for the purposes specified in this privacy policy - in particular, the planning, application and any development process relating to Sunnica Energy Farm.

We may also use a number of carefully selected third parties to supply us with professional advice or services, such as legal advice. We will only share your information with these suppliers where it is necessary for them to provide us with the services we need in connection with Sunnica Energy Farm. We do not share your information with others for third parties marketing purposes.

In addition, we share your information with providers of technology services which we use, such as data hosting and application hosting service providers, platform providers, and website analytics providers. These include Microsoft Azure and Google Analytics.

Finally, where we need to do so for the purposes described in section 5, we may share your personal data with competent authorities and the courts.

7. WHERE IS YOUR INFORMATION STORED AND HOW LONG DO WE KEEP IT FOR?

7.1 Where Do We Store Personal Data?

Your personal data will be stored on SharePoint, a platform set up and hosted by WSP UK Limited (WSP).

WSP uses a dedicated service called PinPoint to securely store personal data. Data which is stored in PinPoint is hosted by Microsoft Azure. Microsoft may use sub-processors who need access to the data in various parts of the world, including in particular in the United States, to provide their services. You may find information about the sub-processors used by Microsoft and the locations where they may process personal data here: <https://azure.microsoft.com/en-us/global-infrastructure/data-residency/>. International data transfers to Microsoft and its sub-processors are made on the basis of standard contractual clauses which have been issued under the Data Protection Act 2018 and which are aimed at providing appropriate safeguards for the data which is transferred.

We also collect and process Usage Data by using Google Analytics. This involves data being transferred to the United States. Such transfers are also made on the basis of standard contractual clauses, as described above.

In addition, we store personal information, such as information documented in paper questionnaires, in secure locations within our offices.

7.2 Retention of your personal data

We will only retain your personal data for as long as it is needed for the relevant purpose of processing. Once such period expires, we will securely and permanently delete your data.

We will keep your personal data for the duration of the planning and consultation period associated with the proposed development of Sunnica Energy Farm. Following the outcome of the planning application your information will also be kept for the duration of any appeals period and, where the application has been successful, some of the information may need to be kept during the development and operation of Sunnica Energy Farm.

Although it is difficult to provide exact timeframes for the retention of your personal data, the retention periods will be calculated as follows:

- Where personal data is processed solely in connection with the application process, the data will be held until the application for the project is finally resolved. This includes the time during which the application is pending and the time during which actions for judicial review may be brought (and concluded). We estimate this time to be approximately 3 years.
- Where personal data is processed in connection with the operation of the project, this will be processed for a period of 40 years from when the project is commissioned. The project would be commissioned after the application is finally resolved.

8. WHAT RIGHTS DO YOU HAVE?

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data. These rights are summarised below. You may contact us using the details at the beginning of this privacy policy to request the exercise any of these rights.

In some instances, we may be unable to carry out your request, in which case we will write to you to explain why.

Your right of access	You have the right to request confirmation that your personal data is being processed, access to your personal data (through us providing a copy) and other information about how we process your personal data.
Your right to rectification	You have the right to request that we rectify your personal data if it is not accurate or not complete.
Your right to erasure	You have the right to ask us to erase or delete your personal data where there is no reason for us to continue to process your personal data.
Your right to restriction of processing	You have the right to ask us to restrict or block the processing of your personal data that we hold about you in certain circumstances.
Your right to port your personal data	You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
Your right to object	You have the right to object to the processing of your personal information in certain circumstances.

9. WHAT IF YOU HAVE A COMPLAINT?

If you have any queries or concerns regarding our processing of your personal data or would otherwise like to make a complaint, please contact us in the first instance using the contact details at the start of this privacy policy, so that we can do our very best to sort out the problem.

However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to our supervisory authority, which is the UK's Information Commissioner's Office. Their address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Please see www.ico.org.uk for further details.

10. OTHER WEBSITES

Our websites may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies

and that we do not accept any responsibility or liability for these policies or your use of those websites.

11. CHANGES TO THIS PRIVACY POLICY

We will take all measures necessary to communicate any changes to this privacy policy to you, and will post any updated privacy policies on this page.

This policy was last reviewed and updated in April 2021.