

	DATA PROTECTION POLICY	Document No.	1
		Issue date	31 January 2018
		Revision no.	4
		Revision date	January 2024
		Next review date	January 2025
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1. BACKGROUND

- 1.1 Infinis, its staff and certain suppliers hold personal data about individuals for a variety of business purposes, the processing of which is subject to legal requirements.
- 1.2 Infinis Energy Services Limited is the “controller” of personal data that is gathered and used for the business purposes of the Infinis group of companies.

2. POLICY STATEMENT

- 2.1 We are committed to processing all personal data in accordance with applicable data protection laws, including the Privacy and Electronic Communications (EC Directive) Regulations 2003, the General Data Protection Regulation 2016/679 (so far as these form part of domestic law in the United Kingdom), the Data Protection Act 2018, the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019, SI 2019/419, each as amended and updated from time to time (the **Data Protection Legislation**).
- 2.2 We will observe the following principles in respect of the processing of personal data:
- to process personal data fairly, lawfully and in a transparent manner in relation to the individual;
 - to make sure that any personal data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - to make sure that personal data is adequate, relevant and limited to that which is necessary in relation to the purposes for which it is processed;
 - to make sure personal data is accurate and, where necessary, kept up to date. This requires every reasonable step to be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
 - to keep personal data in a form which permits identification of data subjects for no longer than necessary for the purpose for which the personal data is processed;
 - to process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against

accidental loss, destruction or damage using appropriate technical or organisational measures;

- to ensure that personal data is processed in line with data subjects' rights; and
- not to transfer personal data to people or organisations situated in countries without adequate safeguards in place.

3. APPROACH

- 3.1 We shall maintain systems of work and procedures to ensure that all persons who work for Infinis as well as those who process personal data on Infinis' behalf comply with these principles and assist in securing compliance with this Policy.
- 3.2 It is the duty of all members of staff and suppliers to ensure that they comply with this Policy and the applicable procedures. We aim to provide our staff with sufficient information, instruction and training as is necessary in order for them to identify personal data and to process it appropriately and in accordance with this Policy and our data protection procedures.
- 3.3 This Policy has been approved by the Infinis Energy Management Limited board (the **Board**). Ultimate responsibility for the protection of personal data lies with the Chief Financial Officer, as Compliance Officer. The Chief Financial Officer has primary responsibility for monitoring the use and effectiveness of this Policy and dealing with any queries on its interpretation.
- 3.4 Implementation of, and compliance with, this Policy and the applicable data protection procedures is a line management responsibility, but success of this Policy depends upon the commitment of all members of staff and suppliers involved in processing personal data.
- 3.5 The Infinis Energy Management Board reviews this Policy and its implementation at least annually and updates it as required.

4. FURTHER INFORMATION

For further information about how Infinis processes personal data, please contact as follows.

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Shane Pickering
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