

Springfield Group Privacy Statement

1. Introduction

Protecting customer and employee personal data is important to Springfield Group. This Privacy Statement explains how we collect, use, store, share, and protect personal data of:

- Website visitors
- Individuals we communicate or interact with in our business
- Individuals whose data is shared in connection with our products and services
- Event attendees
- Visitors to our offices or sites

Personal data may be provided directly by you or through third parties. Additional privacy notices may supplement this statement to provide a comprehensive overview of how your data is processed.

Before providing personal data about another individual, you must: (a) Inform the individual about this Privacy Statement and any other applicable notices. (b) Obtain their permission to share their data with us. (c) Secure any legally required consents, if applicable.

2. Company Information

Springfield Group, a portfolio company of I Squared Capital, is an integrated energy company operating through three units:

- **Renewables**
- **Flexible Generation**
- **Customer Solutions**

For more information, visit www.springfieldgroup.com.

3. Definitions

3.1 Data Protection Legislation Includes GDPR, UK GDPR, Irish Data Protection Acts, UK and Irish privacy regulations, and other applicable laws.

3.2 Personal Data Information relating to an identified or identifiable person (e.g., name, ID, location data, online identifiers).

3.3 Special Category Personal Data Sensitive data such as racial/ethnic origin, political opinions, religious beliefs, health data, genetic/biometric data, or sexual orientation. Criminal data has separate safeguards.

4. Data Protection Principles

Springfield Group adheres to the seven GDPR principles:

1. **Lawfulness, Fairness, and Transparency:** Process data lawfully and transparently.
 2. **Purpose Limitation:** Process only for specified, legitimate purposes.
 3. **Data Minimisation:** Collect only necessary data.
 4. **Accuracy:** Keep data accurate and up to date.
 5. **Storage Limitation:** Retain data only as long as necessary.
 6. **Integrity and Confidentiality:** Ensure security against loss, destruction, or damage.
 7. **Accountability:** Demonstrate compliance with data protection principles.
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5. Data We May Collect

We may collect personal data when you:

- Visit our website
- Contact us by phone, email, letter, or in person
- Receive our products/services
- Visit our sites (e.g., CCTV recordings, visitor logs)

We may collect data such as your name, contact details, and other relevant information. Data collection complies with this Privacy Statement and the stated purposes.

We generally do not process Special Category Personal Data unless:

- Specified in our Employee or Customer Privacy Statements
- Required for legal claims, proceedings, or investigations

Please keep your personal data up to date by informing us of any changes.

6. How We Use Your Information

Your information will be processed:

- To fulfill contracts or take pre-contract steps

- To respond to queries or complaints
- To comply with legal obligations
- For legitimate business interests
- To protect your vital interests
- With your consent (which can be withdrawn at any time)

Examples of legitimate interests include:

1. **Communications and Security:** Maintaining IT infrastructure, ensuring business continuity, and safeguarding facilities.
 2. **Business Operations:** Marketing, product/service development, strategic planning, mergers/acquisitions, and market research.
 3. **Compliance:** Meeting legal obligations (e.g., tax, audits, health and safety) and responding to legal processes.
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7. Sharing Your Information

We may share your personal data within Springfield Group and with third parties, such as:

- External service providers (auditors, IT providers, marketing agencies, etc.)
- Government/public authorities (e.g., courts, regulatory bodies)
- Legal representatives or participants in legal proceedings

Data may be transferred outside the EEA or UK, but only with appropriate safeguards (e.g., EU standard contractual clauses).

8. Retention of Your Information

Personal data is retained only as long as necessary:

- For product/service delivery
 - For marketing (subject to consent)
 - For transaction records (up to 7 years)
 - To comply with regulatory and legal requirements
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9. Your Rights

Under GDPR, you have the right to:

1. Access your personal data

2. Correct inaccurate data
 3. Request deletion of data in certain circumstances
 4. Restrict data processing in certain circumstances
 5. Receive your data in a portable format
 6. Withdraw consent for processing based on consent
 7. Object to processing for legitimate interests (e.g., marketing)
 8. Not be subject to automated decision-making
 9. Lodge a complaint with the relevant Data Protection Authority
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10. Protecting Your Information

We implement appropriate technical and organisational measures to secure your personal data against unauthorised processing, loss, destruction, or damage.

11. Data Protection Contact

For questions or concerns, contact: **Group Data Protection Officer** Greenwood House, 64 Newforge Lane, Belfast, BT9 5NF
Email: info@growwithsfr.com

12. Statement Review

This Privacy Statement will be regularly reviewed and updated as necessary. We recommend checking back periodically for updates.