

VESTAS BINDING CORPORATE RULES POLICY

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SECTION A: BACKGROUND AND OVERVIEW

Introduction

This document and its appendices comprises the Binding Corporate Rules ("BCR") for the Vestas Group for the protection and management of personal data.

Protection of the security and privacy of personal data is important to the Vestas Group and the Vestas Group conducts its business in compliance with the applicable laws on data protection and data security.

The BCR are internal rules adopted by Vestas Wind Systems A/S ("VWS") and its participating corporate entities (each a "Vestas Entity" and together with Vestas Wind Systems A/S, the "Vestas Group" or merely "Vestas"), to present "adequate safeguards for the protection of the privacy and fundamental rights and freedoms of individuals" within the meaning of applicable data protection law, especially the data protection laws of the Member States of the European Economic Area ("EEA").

A list of the Vestas Entities which are subject to the BCR are listed in Appendix 1.

DEFINITIONS

In the BCR the expressions have the meanings ascribed to them in the GDPR. In addition to the terms used in the GDPR, Terms written with a capital letter will have the meaning ascribed to them below:

"Binding Corporate Rules" or "BCR" means the Vestas Binding Corporate Rules set out in this Binding Corporate Rules Policy, including its appendices and the Undertaking.

"Compliance Verification Protocol" means the compliance verification protocol as set out in Appendix 5 of the BCR.

"Head of Data Privacy" means the person who is responsible for overseeing the daily compliance.

"Data Privacy Committee" means the data privacy steering committee consisting of senior management and representatives from People&Culture (HR), Legal, Risk & Compliance and Global IT.

"Data Subject Request and Complaint Handling Procedure" means the data subject request and complaint handling procedure as set out in Appendix 4 of the BCR.

"Europe" means the countries in the European Economic Area and Switzerland.

"European Data Protection Laws" means the data protection laws applicable to the relevant Vestas Entity established within an EEA member state, including the GDPR. Any reference in the BCR to applicable law shall mean a reference to the European Data Protection Laws applicable to the relevant data exporting Vestas Entity and not the laws of countries outside EU/EEA.

"GDPR" means European Union (EU) Regulation 2016/679 (the General Data Protection Regulation).

"Legal and Compliance Teams" means the legal and compliance teams appointed for a region.

"Local Data Privacy Responsible" means the local data privacy responsables appointed for one or more Vestas Entities.

"Member State" means a country within the EEA.

“Special Categories of Personal Data” means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

“Undertaking” means the legally binding undertaking under which the Vestas Entities are obliged to adhere to the BCR.

“Updating and Co-operation Procedure” means the updating and co-operation procedure set out in Appendix 2.

“Vestas Headquarter” means VWS.

About Vestas

VWS is the ultimate parent of the Vestas Entities, and its principal office is at Hedeager 42, 8200 Aarhus N, Denmark. VWS has subsidiaries and affiliates located in approximately 50 countries worldwide.

Vestas is the energy industry’s global partner on sustainable energy solutions. We design, manufacture, install, and service wind turbines across the globe.

For more information about the Vestas Group please see www.vestas.com.

What data does the BCR cover?

The BCR will cover all personal data processed by Vestas Entities in Europe and all personal data transferred to Vestas Entities outside Europe. This includes personal data concerning employees, customers, subcontractors and other third parties processed internally by the Vestas Entities as part of their regular business activities.

Personal data processed under the BCR may include (but is not limited to):

- **Personal details** including: current and previous name; current and previous surnames; e-mail and telephone details (personal and professional); home address; date of birth; language preference; gender; marital status; salutation/title; dependants; emergency contact information; photograph; nationality and second nationality (if any); IP address;
- **Documentation required under immigration laws** including: citizenship; passport data; details of residency or work permit;
- **Payroll data** including: banking details; working time records (including vacation and other absence records, leave status, hours worked and department standard hours); termination date; national identification number;
- **Position information** including: description of current position; title; salary plan; pay grade or level; unit/department; location; supervisor(s) and subordinate(s); employee identification number; terms of employment/engagement; work history; (re-)hire and termination date(s); length of service; retirement eligibility; promotions and disciplinary records; global mobility/secondment information;

- **Talent management information** including: details contained in letters of application and resume/CV; previous employment background; education history; professional qualifications; language and other relevant skills; details on performance management ratings; psychometric test results; development plan; willingness to relocate;
- **Compensation information** including: base salary/fee; bonus and awards; benefits; pay enhancements for dependants; overtime and shift work; salary step with assigned grade; details of long and short term incentive schemes; currency; pay frequency and method; effective date of current compensation; tax related information; bank account/payment information; salary reviews and performance appraisals; pensions related information;
- **Management records** including: details of any shares or directorships;
- **Contact details on suppliers and customers** including: name; email address; telephone number; CV information; and
- **Special Categories of Personal Data as required and permitted by applicable law, especially European Data Protection Laws**, for example: diversity-related personal data (such as sex and racial or ethnic origin) necessary in order to comply with applicable European Data Protection laws and Vestas Group policies regarding diversity and anti-discrimination; health related information in order to comply with applicable European Data Protection Laws and Vestas Group policies relating to health and safety, to manage and administer workforce and for incident management purposes; trade union membership; personal data obtained through background checking activities as necessary to comply with applicable European Data Protection laws and Vestas Group policy; information relating to religious beliefs necessary to comply with applicable European Data Protection Laws; passport data in order to comply with applicable law.

Where permitted by local law, transfers of personal data may be made for purposes including:

- **Managing employee related personal data** – facilitating business operations and managing work activities and employees generally, including: appraisals; promotions and succession planning; administering salary; payments administration and reviews; administering wages and other awards such as bonuses, health care, pensions and savings plans; providing training; managing leave, promotions, transfers and secondments; honouring other contractual benefits; performing workforce analysis and planning; performing background checks as permitted by applicable law; managing disciplinary matters and terminations; making business travel arrangements; providing employee self-service facilities; providing references; ensuring business continuity; protecting the health and safety of employees and others; safeguarding IT infrastructure, office equipment and other property; facilitating communications, including in emergencies; allocating human resources;
- **Customer and Supplier relations** – facilitating and managing relations with customers and suppliers via customer or supplier employee as a contact person for Vestas;
- **Business Operations** - managing business operations generally, including: operating and managing IT and communications systems; managing product and service development; improving products and services; managing and protecting Vestas Group assets; allocating Vestas Group assets; strategic planning; project management; compilation of audit trails and other reporting tools; maintaining records relating to manufacturing and other business activities; budgeting; financial management and reporting; communications; managing mergers, acquisitions, re-organizations and/or disposals; Customer relationship management; order processing and fulfilment; Supplier engagement, evaluation and management;

- **Compliance** - complying with legal and other requirements, such as: making tax and national insurance deductions; meeting record-keeping and reporting obligations; conducting audits; compliance with government inspections and other requests from government or other public authorities; responding to legal process; pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims; complying with internal policies and procedures; and
- **Monitoring** - monitoring compliance with internal policies, including the policies with regard to telephone, email, internet and other Vestas Group resources and other monitoring activities as permitted by local law.

Further details about the scope of processing activities covered by the BCR are set out in Appendix 7 (Overview of data processing activities covered by the BCR).

Who must comply with the BCR?

VWS and all Vestas Entities established in Europe and their employees must comply with and respect the BCR when processing personal data, which includes transferring that information to another Vestas Entity located outside of Europe.

All Vestas Entities established outside Europe and their employees must comply with and respect the BCR when processing personal data that has been transferred to them from a Vestas Entity in Europe, or via a Vestas Entity outside Europe when the personal data was originally transferred from Europe.

Further information

If you have any questions about the BCR please contact:

Email:	dataprivacy@vestas.com
Address:	Vestas Wind Systems A/S, Hedeager 42, 8200 Aarhus N, Denmark.

The BCR is published on <https://www.vestas.com/>.

A list of the Vestas Entities and the countries to which personal data may be transferred under the BCR is available in Appendix 1.

SECTION B: SUBSTANTIVE PRINCIPLES FOR PROCESSING PERSONAL DATA

PRINCIPLE 1 – LEGITIMACY AND LEGALITY OF DATA PROCESSING

Principle 1A – Vestas Entities will comply with any applicable data protection legislation.

Vestas Entities will ensure that processing of personal data is undertaken in accordance with applicable data protection laws, including the GDPR.

Where there is no law or the law does not meet the standards set out by the BCR, Vestas Entities will process personal data adhering to the principles as stated in the BCR.

Where applicable data protection laws require a higher level of protection than is provided for in the BCR, the higher level of protection will take precedence.

Where applicable local law prevents a Vestas Entity from fulfilling or has a substantial effect on its ability to comply with, its obligations under the BCR, the Vestas Entity will follow the process set out in Principle 11.

Principle 1B – Vestas Entities will ensure that their processing of personal data is fair and lawful and, carried out on a valid legal basis.

Vestas Entities will ensure that their processing of personal data is fair and lawful, the personal data is processed for specified and explicit purposes and that a legal basis for processing personal data exists, before initiating the processing activity. It means that, for example, , taking into account any specific provisions in a particular European Member State, Vestas Entities will only process that personal data where:

- the data subject has given consent to the processing of his or her personal data and the consent meets the required standards under the GDPR;
- it is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject before entering into a contract;
- it is necessary for compliance with a legal obligation to which Vestas Entities are subject where that legal obligation derives from either European law or the law of a European Member State;
- it is necessary in order to protect the vital interests of the data subject or of another data subject;
- it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in a Vestas Entity where that processing is set out either European law or the law of a European Member State to which the Vestas Entity is subject; or
- it is necessary for the purposes of the legitimate interests pursued by a Vestas Entity or by a third party, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Principle 1C – Vestas Entities will only process Special Categories of Personal Data where the data subject's explicit consent has been obtained unless processing is permitted by an alternative legal basis under applicable European Data Protection Laws

Special Categories of Personal Data is information relating to a data subject's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, or genetic or biometric data processed for the purpose of uniquely identifying a person.

In principle, data subjects must explicitly consent to a Vestas Entity processing their personal data, when the data is considered a Special Category of Personal Data unless the Vestas Entity has another legal basis for doing so, provided that such legal basis:

is established under applicable European Data Protection Law or Member State Law.

is established under applicable law on the basis that processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

is established under applicable law on the basis processing relates to personal data which are manifestly made public by the data subject; or

is established under applicable law on the basis processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Special Categories of Personal Data may be subject to special requirements or derogations under national European Data Protection Laws, and thus the legal basis for processing must be consistent with the applicable law of the European country in which the personal data was collected.

PRINCIPLE 2 – ENSURING TRANSPARENCY AND PURPOSE LIMITATION

Principle 2A – Vestas Entities will ensure that personal data is processed exclusively for specified, explicit and legitimate purposes and that data subjects are informed about those purposes.

Prior to processing any personal data on data subjects, it must be ensured that the processing is covered by a privacy statement or privacy policy, which is consistent with the BCR and which provides the data subject with the information stipulated in articles 13 and 14 of the GDPR, as set **out** below and regardless of whether relevant Vestas Entities are directly subject to articles 13 and 14 of the GDPR.

When providing the information, Vestas Entities will ensure to observe the requirements set out in this Principle 2A.

Information to be provided where personal data are collected from the data subject

Except where the data subject already has the information, each Vestas Entity will, at the time where personal data are obtained, provide data subjects (from whom personal data relating to the data subject is collected) with at least the following information:

- the identity and contact details of the controller and its representative, if any;
- the purpose(s) of the processing and the legal basis for the processing;
- where the processing is based on a balancing of interests, the legitimate interest pursued by the relevant Vestas Entity;
- the recipients or categories of recipients, if any;
- where applicable that the personal data is intended to be transferred to a third country, including how adequate safeguards for the protection of data is ensured and the means by which to obtain a copy of or more information on such adequate safeguards.

In addition, each Vestas Entity will provide the following information to the data subject, insofar as such information is relevant and necessary to ensure fair and transparent processing:

- the period for which the personal data will be stored or if that is not possible, the criteria used to determine that period;
- the existence of the right to request access to, rectification or restriction of and/or erasure of personal data as well as the right to object to the processing;
- the right to data portability;
- where a processing is based on consent, the right to withdraw such consent;

- the right to lodge a complaint with an European supervisory authority;
- whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, including whether the data subject is obliged to provide the personal data as well as the possible consequences of failure to provide such personal data;
- whether automated decision making, including profiling, will be applied to the personal data, including information on the logic involved in such decision making and the significance and envisaged consequences of such processing.

Information to be provided where personal data are not obtained from the data subject

Where the personal data have not been obtained from the data subject and where the data subject does not already have the information, each Vestas Entity will provide the data subject with at least the following information:

- the identity and contact details of the controller and its representative, if any;
- the purpose(s) of the processing and the legal basis for the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients, if any;
- where applicable that the personal data is intended to be transferred to a third country, including how adequate safeguards for the protection of data is ensured and the means by which to obtain a copy of or more information on such adequate safeguards.

In addition, each Vestas Entity will provide the following information to the data subject, insofar as such information is relevant and necessary to ensure fair and transparent processing:

- the period for which the personal data will be stored or if that is not possible, the criteria used to determine that period;
- where the processing is based on a balancing of interests, the legitimate interest pursued by the relevant Vestas Entity;
- the existence of the right to request access to, rectification or restriction of and/or erasure of personal data as well as the right to object to the processing;
- where a processing is based on consent, the right to withdraw such consent;
- the right to lodge a complaint with a European supervisory authority;
- from which source the personal data originate, and if applicable, whether it came from publicly accessible sources;
- whether automated decision making, including profiling, will be applied to the personal data, including information on the logic involved in such decision making and the significance and envisaged consequences of such processing.

Timeline for providing the data subject with information

Where personal data is collected from the data subject, each Vestas Entity will provide the information set out above, at the time when the personal data are obtained.

Where the personal data have not been obtained from the data subject itself, each Vestas Entity will provide the information set out above:

- within a reasonable period after obtaining the personal data, but no later than within one (1) month;
- where the personal data are to be used for communication with the data subject, at the latest when the Vestas Entity in question is first communicating to the data subject;
- if disclosure to a third party is envisaged, at the latest when the personal data is first disclosed to such third party.

Processing of personal data for new purposes

Where a Vestas Entity intends to process personal data for a different purpose than that for which the personal data were originally collected, the Vestas Entity in question will prior to the new processing make an assessment of whether the processing meets the requirements for processing for a new purpose in article 6(4) GDPR. If the Vestas Entity in question is satisfied that the new processing is permissible according to this, the Vestas Entity in question will notify the data subject prior to that further processing on the purpose of such processing and provide the data subject with any other relevant information pursuant to the above.

In certain cases, for example, where the processing is of Special Categories of Personal Data (as described in Principle 1C), the data subject's consent to the new processing may be necessary.

Exceptions to providing Individuals with information where personal data are not obtained from the data subject

In situations where personal data are not obtained from the data subject, and when provided for by applicable law of an EU Member State, the data subject will not have a right to information under the following circumstances:

- the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to complying with and implementing alternative measures as regulated by European Data Protection Laws;
- if obtaining or disclosure of the personal data is expressly laid down by European Data Protection Laws to which the relevant Vestas Entity is subject and which provides appropriate measures to protect the data subject's legitimate interests; or
- where the personal data must remain confidential subject to an obligation of professional secrecy regulated by European Data Protection Laws.

Principle 2B – Vestas Entities will assess the impact of any new processing activity involving personal data or processing of personal data using new technology that is likely to result in a high risk to the rights and freedoms of data subjects.

Each Vestas Entity will prior to engaging in any new processing activity or before using new technology in relation to an existing processing activity assess the risk of the processing activity in question and, where it is assessed that a processing activity is likely to result in a high risk to the rights and freedoms of natural persons, the Vestas Entity will in cooperation with the Local Data Privacy Responsible carry out a data protection impact assessment in accordance with Article 35 of the GDPR.

If the data protection impact assessment indicates that the processing would result in a high risk in the absence of measures taken by the Vestas Entity to mitigate the risk, the Local Data Privacy Responsible must consult the Head of Data Privacy and the Head of Data Privacy will consult the competent European supervisory authority (namely the Danish Data Protection Agency), prior to processing personal data for the relevant processing activity.

PRINCIPLE 3 – ENSURING DATA MINIMISATION, ACCURACY AND STORAGE LIMITATION

Principle 3A – Vestas Entities will only collect and use the minimum amount of personal data required.

Vestas Entities will only process personal data that is adequate, relevant and not excessive to fulfil the purpose for which it was collected and is used.

Principle 3B – Vestas Entities will ensure that personal data is kept accurate and up to date.

Vestas Entities will ensure that personal data is accurate and up to date using appropriate measures; for example, by ensuring that personal data, which is inaccurate or incomplete, is corrected, blocked or erased accordingly.

Principle 3C – Vestas Entities will only keep personal data for as long as is necessary for the purposes for which it is processed.

Vestas Entities will only keep personal data for as long as is necessary for the purposes for which the personal data were initially collected, or further processed in accordance with Principle 2A.

Vestas Entities will comply with any applicable internal guidelines, including but not limited to data privacy guidelines and information security policies (or equivalent) as revised and updated from time to time.

Personal data, which is no longer required for the purposes for which it was initially collected and stored, is to be erased. In the event that statutory retention periods apply, the personal data shall be restricted rather than erased.

PRINCIPLE 4 – DATA SECURITY

Principle 4A – Vestas Entities are committed to ensuring protection of data subjects' personal data when it is processed by Vestas Entities.

Vestas Entities will adhere to appropriate technical and organisational security measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access and against all other unlawful forms of processing.

Having regard to the state of the art and the cost of their implementation, such measures will ensure a level of security appropriate to the risks represented by the processing and the nature of the personal data to be protected (privacy by design).

Special Categories of Personal Data and, taking into account local law variations, national identification numbers and criminal offences will be subject to specific security and protection measures. Such measures will further ensure that, by default, only personal data which are necessary for each specific purpose of the processing are processed (privacy by default).

Vestas Entities complies with the Vestas Group's information security policies as revised and updated from time to time, together with any other security procedures relevant to a particular part of the business.

Principle 4B – Vestas Entities will adhere to the Vestas Group's data protection breach policies and procedures.

The Vestas Group has implemented a data protection breach procedure, which sets out the process which must be followed in the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed (a "personal data breach").

The data protection breach procedure sets out how all personal data breaches must be reported to the Head of Data Privacy and procedures for how the Head of Data Privacy and the Vestas Entities must handle personal data breaches, including reporting such to the relevant European supervisory authorities and notifying data subjects.

In the event of a personal data breach, the relevant Vestas Entity will notify:

- the Head of Data Privacy via the Vestas' Headquarter;
- the competent European supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of data subjects; and
- data subjects, in cases where the personal data breach is likely to result in a high risk to their rights and freedoms unless such notification is not required under applicable European Data Protection Laws.

Such notification must be made without undue delay after becoming aware of the personal data breach, and, with respect to notification of the competent European supervisory authority, no later than seventy-two (72) hours after becoming aware of the personal data breach.

The Head of Data Privacy and the Local Data Privacy Responsible will document the incident, comprising the facts related to the personal data breach, its effects and the remedial action taken, and the documentation will be made available to the European supervisory authorities on request.

Principle 4C – Vestas Entities will ensure that their service providers also adopt appropriate and equivalent security measures.

Where a third party provider of a service (acting as a processor) to any of the Vestas Entities processes personal data (e.g. a payroll provider), Vestas Entities will adhere to the Vestas Group's pre-assessment process for the selection of the service provider.

Vestas Entities will ensure that they have in place a written agreement with any third party service provider when the service provider is providing services that involve data processing on behalf of the Vestas Entity. The Vestas Entity will ensure that the written agreement fulfils the requirements set out in applicable European Data Protection Laws, including Article 28 of the GDPR.

Accordingly, the Vestas Entity will ensure that where processing is to be carried out on behalf of the Vestas Entity, the Vestas Entity shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the BCR and ensure the protection of the rights of the data subject.

The Vestas Entity will ensure that the processor shall not engage another processor without prior specific or general written authorisation of the controller. In the case of general written authorisation, the processor shall inform the controller of any intended changes concerning the addition or replacement of other processors, thereby giving the controller the opportunity to object to such changes.

The Vestas Entity will ensure that the processing shall be governed by a contract or other legal act, that is binding on the processor with regard to the controller and that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects and the obligations and rights of the controller. That contract or other legal act shall stipulate, in particular, that the processor:

- 1) processes the personal data only on documented instructions from the Vestas Entity, including with regard to transfers of personal data to a third country or an international organisation, unless required to do so by Union or Member State law to which the processor is subject; in such a case, the processor shall inform the Vestas Entity of that legal requirement before processing, unless that law prohibits such information on important grounds of public interest;
- (b) ensures that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- (c) takes all measures required pursuant to the principles of Article 32 of the GDPR regardless of whether the processor is subject to Article 32 of the GDPR;
- (d) respects the conditions referred to in paragraphs 2 and 4 for engaging another processor;
- (e) taking into account the nature of the processing, assists the controller by appropriate technical and organisational measures, insofar as this is possible, for the fulfilment of the controller's obligation to respond to requests for exercising the data subject's rights set out in the BCR;
- (f) assists the controller in ensuring compliance with the obligations to establish and maintain adequate technical and organisation security measures pursuant to the principles of Article 32 and 36 of the GDPR taking into account the nature of processing and the information available to the processor;
- (g) at the choice of the Vestas Entity, deletes or returns all the personal data to the Vestas Entity after the end of the provision of services relating to processing, and deletes existing copies unless Union or Member State law requires storage of the personal data;
- (h) makes available to the Vestas Entity all information necessary to demonstrate compliance with the obligations laid down in this Principle 4C and allow for and contribute to audits, including inspections, conducted by the controller or another auditor mandated by the controller.

With regard to point (h) of the first subparagraph, the processor shall immediately inform the controller if, in its opinion, an instruction infringes this Regulation or other Union or Member State data protection provisions.

The Vestas Entity will ensure that where a processor engages another processor for carrying out specific processing activities on behalf of the Vestas Entity, the same data protection obligations as set out in the contract or other legal act between the Vestas Entity and the processor as referred to in this Principle 4C shall be imposed on that other processor by way of a binding contract or other legal act, in particular providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of the BCR. Where that other processor fails to fulfil its data protection

obligations, the initial processor shall remain fully liable to the Vestas Entity for the performance of that other processor's obligations.

Principle 4D – Where one Vestas Entity provides a service on behalf of another, those Vestas Entities will ensure that personal data is protected by appropriate security measures.

Where a Vestas Entity (Entity A) processes Personal Data as a processor on behalf of an EEA Vestas Entity (Entity B), the Vestas Entities will ensure they have in place a written agreement covering the processing, which fulfils the principles set out in the European Data Protection Laws, including Article 28 of the GDPR and Principle 4C above.

PRINCIPLE 5 – ENSURING ADEQUATE PROTECTION FOR CROSS-BORDER TRANSFERS

Principle 5A– Vestas Entities will not transfer personal data to third parties outside the Vestas Group which are located outside the EEA, without ensuring adequate protection for the personal data in accordance with the standards set out by the BCR and applicable European Data Protection Laws.

In principle, transfers of personal data to third parties outside the Vestas Group which are located outside the EEA, are not allowed without appropriate steps being taken to ensure adequate protection of the personal data in the third country.

The transfer of personal data from a Vestas Entity to a non-Vestas Entity (i.e. an entity that is not bound by the BCR) outside the EEA is only permissible if the following conditions are fulfilled:

- the receiving entity demonstrates that it has an adequate level of protection for personal data within the meaning of Article 46 of the GDPR, e.g. by concluding an EU standard contract (Standard Contractual Clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council) or by concluding other appropriate contractual agreements between the transferring and the receiving entity in accordance with Article 46(3)(a) of the GDPR, or
- the transfer is permissible under the exceptions defined in Article 49 of the GDPR, to the extent such transfer is not massive, disproportionate or indiscriminate.

Transfers of personal data from a Vestas Entity to any public authority cannot be massive, disproportionate and indiscriminate in a manner that would go beyond what is necessary in a democratic society.

Furthermore, if the receiving entity is a processor, the conditions set out in Articles 28 and 29 of the GDPR and Articles 24, 25 and 32 of the GDPR must additionally be satisfied.

PRINCIPLE 6 – RESPECT FOR DATA SUBJECTS' RIGHTS

Principle 6A – Vestas Entities will ensure the respectful use of personal data and honour the rights of data subjects.

Vestas Entities will adhere to the Vestas Group's Data Subject Request and Complaint Handling Procedure set out in Appendix 4 and will respond to queries or requests made by data subjects in relation to the rights set out under the GDPR, in accordance with this procedure.

Data subjects whose personal data is transferred under the BCR, have the rights set out in the European Data Protection Legislation regardless of whether the data subjects are subject to the European Data Protection Legislation, in particular:

- the right to be informed whether any personal data about them is being processed by Vestas and to request certain information about the processing of their personal data ('right of access');
- the right to request rectification, erasure or blocking of personal data the processing of which does not comply with the provisions of the BCR or applicable law, in particular because of the incomplete or inaccurate nature of the data ('right to rectification', 'right to deletion' and 'right to restriction');
- the right to request portability of the personal data, which they have provided to Vestas, where the processing by Vestas is based on consent or on a contract with the data subject and where the processing is carried out by automated means ('right to data portability');
- the right at any time to object to the processing, on grounds relating to the data subject's particular situation, where the processing of personal data is based on a balancing of interests, including profiling based on a balancing of interests ('right to object');
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her ('right not to be subject to automated decision making or profiling');
- the right to withdraw consent, where the processing of their personal data is based on consent ('right to withdraw consent').

Vestas Entities will ensure that requests for access, portability, deletion, rectification, objection to processing, or to being subject to automated decision-making or profiling and withdrawal of consent, are handled with respect of the data subject and in accordance with the Vestas Group's Data Subject Request and Complaint Handling Procedure (as amended from time to time), as well as applicable European Data Protection Laws.

Principle 6B – Where decisions are made by automated means, including profiling, individuals will have the right to know the logic involved in the decision and Vestas Entities will take necessary measures to protect the legitimate interest of data subjects.

If personal data is processed for the purpose of making automated individual decisions, the legitimate interests of the data subject must be ensured through appropriate measures and the data subjects must be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Decisions which have legal consequences for the data subject or substantially prejudice the data subject may not be reached exclusively on the basis of an automated individual procedure designed to evaluate an individual's personal characteristics. An exception applies only if the decision:

- is taken in the course of entering into, or performing a contract, between the data subject and a data controller;
- is authorized by applicable European Data Protection Laws which also lays down measures to safeguard the data subject's legitimate interests; or
- is based on the data subject's explicit consent.

Where the decision is taken in the course of entering into, or performing a contract, between the data subject and a data controller, or where the decision is based on the data subject's explicit consent, the Vestas Entity shall implement the right to obtain human intervention with the Vestas Entity, to express his or her point of view and to contest the decision.

Principle 6C – Vestas Entities will respect data subjects’ right not to be targeted for direct marketing purposes.

Vestas Entities will inform the individuals on their right to object to processing of personal data for advertising purposes.

Furthermore, Vestas Entities will respect the data subject’s objection to being targeted for marketing purposes and will on such request refrain from contacting the individual directly with marketing materials.

SECTION C: PRACTICAL COMMITMENTS

PRINCIPLE 7 – COMPLIANCE

Principle 7 – The Vestas Group has appropriate staff and support to ensure and oversee privacy compliance throughout the business.

VWS has appointed a Head of Data Privacy to oversee compliance with the BCR. The Head of Data Privacy reporting line leads to the Data Privacy Committee.

In connection with the BCR, the Head of Data Privacy will:

- document personal data breaches, their effects and the remedial action taken in accordance with Principle 4B;
- deal with complaints made by data subjects whose personal data is processed under the BCR in accordance with Principle 8;
- require assessments of compliance with the BCR to be conducted where appropriate in accordance with Principle 9A;
- maintain a log of changes made to the BCR and the Vestas Entities bound by the BCR in accordance with Principle 10A;
- in accordance with Principle 11C, receive reports from Vestas Entities where a Vestas Entity believes the applicable local legislation prevents it from fulfilling its obligations under the BCR, or such legislation has a substantial effect on its ability to comply with the BCR;
- make a responsible decision on the action to take and consult the competent European supervisory authority in circumstances in which there is a conflict between the legislation applicable to a Vestas Entity and the BCR as described in Principle 11D;
- take action in accordance with Principle 11C where a non-European Vestas Entity receives a legally binding request from a public authority for disclosure of personal data exported from Europe under the BCR;
- inform and advise the highest levels of management within the Vestas Group on matters relating to data protection;
- liaise with European supervisory authorities; and
- monitor and report on data protection compliance at a global level.

The Head of Data Privacy is assisted by a network of Local Data Privacy Responsibles, Legal and Compliance Teams and the Data Privacy Committee.

The Data Privacy Committee makes decisions and ensures support of the work performed by the Local Data Privacy Responsibles, the Legal and Compliance Teams and the Head of Data Privacy.

The Head of Data Privacy together with the Local Data Privacy Responsibles and the Legal and Compliance Teams are responsible for initiating and overseeing compliance initiatives. The Local Data Privacy Responsibles are responsible for handling local requests and complaints from data subjects, reporting major privacy issues to the Head of Data Privacy and for ensuring compliance at a local level. In addition to supporting the Head of Data Privacy the Local Data Privacy Responsible supports management at relevant functional, regional and country level who has the ultimate responsibility for overseeing, enabling and ensuring compliance with the BCR at functional, regional and country level. The Head of Data Privacy and the Local Data Privacy Responsibles supports and collaborate with Legal and Compliance, P&C (HR function), IT as well as functions such as Procurement, Sales, Service, Construction, Marketing and Finance departments in group as well as at regional and country level to ensure anchoring of compliance tasks and responsibilities in the line of business.

Where legally required the Vestas Entity in question will locally appoint a data protection officer where legally required. The data protection officer must execute his or her duties in accordance with and in compliance with the BCR.

PRINCIPLE 8 – COMPLAINT HANDLING

Principle 8 – The Vestas Group will handle complaints made by data subjects whose personal data is processed under the BCR in accordance with this Principle 8 and the Vestas Group’s Data Subject Request and Complaint Handling Procedure.

Any data subject whose personal data has been processed under the BCR may make a complaint in writing to dataprivacy@vestas.com or in ServiceNow.

The Head of Data Privacy/Local Data Privacy Responsible will liaise with relevant business units and employees to investigate the complaint and will prepare a response.

A Vestas Entity must respond to a request or complaint without undue delay and in any event within one (1) month of receipt of the request or complaint. The period for responding to the request may be extended by two (2) further months where necessary, taking into account the complexity and number of requests. The Head of Data Privacy/Local Data Privacy Responsible will inform the data subject of any such extension within one (1) month of receipt of the request or complaint, together with the reasons for the delay.

If the data subject disputes the response provided or any aspect of a finding and notifies the Head of Data Privacy/Local Data Privacy Responsible accordingly, the Head of Data Privacy may refer the matter to VWS' General Counsel or the Data Privacy Committee.

The Head of Data Privacy will review the case and advise the data subject of his/her decision either to accept the original finding or to substitute a new finding. The reviewer will respond to the complainant within one (1) month of the referral. If the complaint is upheld, the Head of Data Privacy, together with VWS' General Counsel will arrange, in conjunction with the relevant Vestas Entity, for any necessary steps to be taken as a consequence.

In addition, data subjects whose personal data is transferred and processed under the BCR have the right to lodge a complaint with a European supervisory authority, especially in the Member State where the data subject works, resides, or where the alleged infringement has taken place, as explained in the Section D below. Further, the data subject has the right to take action against a Vestas Entity in the courts of the jurisdiction in which the Vestas Entity

responsible for the alleged breach is established, the Vestas Entity responsible for exporting the personal data is established or in the courts of the jurisdiction where the data subject resides. These rights will apply whether or not the data subject has first made a complaint to the Vestas Group.

PRINCIPLE 9 – COMPLIANCE VERIFICATION AND RECORD KEEPING

Principle 9A – The Vestas Group will follow its internal compliance assessment procedures in order to verify that personal data is being processed in compliance with all aspects of the BCR in accordance with this Principle 9A.

The Vestas Group will verify that personal data is being processed in compliance with all aspects of the BCR in accordance with this Principle 9A and the Compliance Verification Protocol, on a regular basis or on the specific request of the Head of Data Privacy (by either internal or external accredited auditors).

Vestas Group will ensure that compliance assessments will be reported to the Data Privacy Committee and the Head of Data Privacy together with details of any remedial action required, recommendations and timescales for remedial action to be undertaken.

Upon request and subject to applicable law, the Vestas Group will provide copies of the results of any audit of the BCR to a European supervisory authority having jurisdiction over the data exporting Vestas Entity. The Head of Data Privacy will be responsible for liaising with the European supervisory authorities for the purpose of providing this information.

Principle 9B - Vestas Entities processing personal data will maintain a written record of their processing activities and make that record available to competent European supervisory authorities on request.

Vestas Entities will maintain a record of data processing activities based on the requirement set out in Article 30 of the GDPR. Accordingly, Vestas Entities will maintain a record of processing activities under its responsibility involving processing of personal data subject to the BCR. That record shall contain all of the following information:

- (a) the name and contact details of Vestas Entity and, where applicable, the joint controller, the Vestas Entity's representative and the data protection officer;
- (b) the purposes of the processing;
- (c) a description of the categories of data subjects and of the categories of personal data;
- (d) the categories of recipients to whom the personal data have been or will be disclosed including recipients in third countries or international organisations;
- (e) where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1) of the GDPR, the documentation of suitable safeguards;
- (f) where possible, the envisaged time limits for erasure of the different categories of data;
- (g) where possible, a general description of the technical and organisational security measures referred to in Article 32(1) of the GDPR.

PRINCIPLE 10 – UPDATE OF THE BCR AND CO-OPERATION WITH EUROPEAN SUPERVISORY AUTHORITIES

Principle 10A – VWS will follow the process outlined in this Principle 10A when updating the BCR.

Vestas' Head of Data Privacy will keep track of and record any updates to the BCR and will make this information available to European supervisory authorities and/or data subjects upon request.

Vestas will without undue delay communicate any material changes to the BCR to the relevant European supervisory authorities, via the competent supervisory authority. Vestas will also provide a brief explanation of the reasons for any notified changes to the BCR. Vestas will once a year provide the competent supervisory authority and any other relevant European supervisory authorities with an overview of changes made to the BCR, which are not considered to be substantial, along with a brief explanation of the reasons for the changes. This includes changes to the list of entities covered by the BCR set out in Appendix 1 to the BCR.

Vestas will communicate any changes to the BCR to the Vestas Entities bound by the BCR and to relevant data subjects who benefit from the BCR. The BCR contains a change log which sets out the date the BCR is revised and the details of any revisions made.

Vestas' Head of Data Privacy will maintain an up-to-date list of the Vestas Entities bound by the BCR and ensure that all new Vestas Entities are bound by the BCR and can deliver compliance with the BCR before a transfer of personal data to them takes place.

Principle 10B – The Vestas Group will co-operate with competent European supervisory authorities in relation to the BCR.

Where required, the Vestas Group will make relevant personnel available for dialogue with a competent European supervisory authority in relation to the BCR and will:

- abide with any decisions made by competent European supervisory authorities on any data protection law issues that may affect the BCR; and
- comply with the views of the European Data Protection Board (“EDPB”), replacing the Article 29 Working Party, or any associated body as outlined in its published guidance on Binding Corporate Principles.

The Vestas Group agrees to abide by the formal decision specifically addressed to the Vestas Group by the competent European supervisory authority.

The Vestas Group also acknowledges that:

- where any Vestas Entity is located within the jurisdiction of a European supervisory authority, that European supervisory authority may audit the Vestas Entity for the purpose of reviewing compliance with the BCR, in accordance with the applicable law of the country in which the Vestas Entity is located; and
- in the case of a Vestas Entity located outside Europe, a European supervisory authority may audit that Vestas Entity for the purpose of reviewing compliance with the BCR in accordance with the applicable law of the European country from which the personal data was transferred under the BCR.

PRINCIPLE 11 – ACTION WHERE NATIONAL LEGISLATION PREVENTS COMPLIANCE WITH THE BCR

Principle 11A – Vestas Entities will ensure that prior to a transfer of personal data taking place, the data exporting entity with help of the data importing entity will, taking into account the circumstances of the transfer, evaluate, if local legislation, regulations, statutes, court orders or mandatory standards (hereinafter “Local Legislation”) will prevent the Vestas Group from fulfilling its obligations under the BCR and determine any required supplementary measures to be taken.

Before any updated Local Legislation comes into force and where the transfer already takes place, the data exporting entity with help of the data importing entity will evaluate, if the updated Local Legislation will prevent the Vestas Group from fulfilling its obligations under the BCR and determine any required supplementary measures to be taken.

Vestas’ Head of Data Privacy, will inform and advise the Vestas Group on the documented investigation and any proposed supplementary measures.

Principle 11B – Vestas Entities will ensure that where the evaluation of Local Legislation requires supplementary measures, the Vestas Group will implement those. However if no supplementary measures can be put in place the Vestas Group must suspend the transfer; if the Vestas Group decides to continue the transfer, the relevant European supervisory authority(ies) will be notified.

The outcome of the evaluation and proposed supplementary measures will be properly documented and kept at the disposal of the EEA supervisory authority(ies).

Principle 11C – Vestas Entities will ensure that where they believe that any legal requirement the Vestas Group is or may become subject to in a third country prevents the Vestas Group from fulfilling its obligations under the BCR, or such legal requirement has or may have a substantial effect on the guarantees provided by the BCR, Vestas Entities will, unless prohibited by law, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation, promptly inform:

- VWS and the Head of Data Privacy; and
- where a Vestas Entity acts as a processor, the Vestas Entity on whose behalf the processing is undertaken, before any processing commences.

If in specific cases notification is prohibited, the requested Vestas Entity will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible. The Vestas Entity must document such efforts to be able to demonstrate that it did so.

Principle 11D – Vestas Entities will ensure that where there is a conflict between the legislation applicable to them and the BCR, the Head of Data Privacy will make a decision on the action to take and will consult the European supervisory authority with competent jurisdiction.

Principle 11E – The Vestas Group will ensure that where a non-European Vestas Entity receives a legally binding request from a public authority for disclosure of personal data exported from Europe under the BCR, that Vestas Entity must take the following steps:

1. Unless prohibited from doing so by the requesting authority, the Vestas Entity subject to the request will put the request on hold and promptly notify VWS and the Head of Data Privacy unless it is prohibited from doing so (such as a prohibition under criminal law to

preserve the confidentiality of a law enforcement investigation). In such cases the Vestas Entity subject to the request will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible to VWS and the Head of Data Privacy and be able to demonstrate that it did so.

2. Where the Head of Data Privacy is notified of a request in accordance with step 1, the Head of Data Privacy will inform the competent supervisory authority about the personal data requested, the requesting public authority and the legal basis for the disclosure, unless prohibited from doing so (such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation). In such cases VWS and the Head of Data Privacy will use its best efforts to obtain the right to waive this prohibition in order to communicate as much information as it can and as soon as possible to the competent supervisory authority, and be able to demonstrate that it did so.
3. If, despite having used its best efforts, the non-European Vestas Entity is not in a position to notify the Head of Data Privacy and the Vestas Entity that exported the personal data of the request, it will provide to the competent supervisory authority, on annual basis, general information about the requests it has received.
4. In any event, the Vestas Entity that imported the personal data will ensure that any disclosures of the personal data made by it to any public authority in response to a legally binding request are not massive, disproportionate and indiscriminate in a manner that it would go beyond what is necessary in a democratic society.
5. Any judgment of a court or tribunal and any decision of an administrative authority of a third country requiring a controller or processor to transfer or disclose personal data may only be recognised or enforceable in any manner if based on an international agreement, such as a mutual legal assistance treaty, in force between the requesting third country and the Union or a Member State, without prejudice to other grounds for transfer pursuant to Chapter V of GDPR.

PRINCIPLE 12 - TRAINING

Principle 12 – The Vestas Group will provide appropriate training to individuals who have permanent or regular access to personal data, who are involved in the collection of personal data or in the development of tools used to process personal data.

The training will be delivered to all individuals as mandatory training when on boarding the Vestas Group and training will also be delivered on at least a yearly basis to employees who have permanent or regular access to personal data, who are involved in the collection of personal data or in the development of tools to process personal data, or in administering and supervising compliance with the BCR. This training will include the data processing requirements set out in the BCR and GDPR, which are specific data protection issues relevant to the roles of those attending. The training will also be delivered to the individuals within Vestas who are responsible for auditing compliance with the BCR.

SECTION D: THIRD PARTY BENEFICIARY RIGHTS

Data subjects whose personal data is processed in Europe by a Vestas Entity and transferred to a Vestas Entity outside Europe, must be able to benefit from certain rights to enforce compliance with the BCR in accordance with European Data Protection Laws.

Accordingly, these data subjects have the right to:

- **Enforce compliance.** Seek enforcement of compliance with the BCR, including its appendices, including but not limited to seeking enforcement of the following rights and principles:
 - The substantive principles for the processing of personal data set out in Section B;
 - The rights of the data subject set out in principle 6;
 - Local statutory regulations insofar as such local law stipulates a higher level of protection of personal data than the BCR;
 - The right to make a complaint through the procedure set out in the Data Subject Request and Complaint Handling Procedure;
 - Any support of or cooperation needed with European supervisory authorities.

- **Complain to Vestas.** Complain to a Vestas Entity established in Europe responsible for exporting the personal data in accordance with the Data Subject Request and Complaint Handling Procedure in Appendix 4, and seek appropriate redress from the Vestas Entity in Europe responsible for exporting the personal data including the remedy of any violation of the BCR by the non-European Vestas Entity.

- **Seek compensation.** To obtain redress and where appropriate, receive compensation from the Vestas Entity responsible for exporting the personal data or the Vestas Headquarter for any damage suffered as a result of a violation of the BCR by the non-European Vestas Entity importing the personal data in accordance with the decision of a European court or other competent European authority.

- **Complain to a European supervisory authority.** Lodge a complaint with a European Supervisory Authority of competent jurisdiction as regards the exporting Vestas Entity.

- **Take judicial action.** Take action against a Vestas Entity in order to enforce compliance with the BCR in the courts of the jurisdiction in which the European Vestas Entity responsible for exporting the personal data to a Vestas Entity established in a non-European country is established or in the courts of the jurisdiction in which the data subject has his or her habitual residence either against the European Vestas Entity responsible for exporting the personal data or against the Vestas Entity established in a non-European country importing the personal data in order to enforce compliance with the BCR, including the appendices.

- **Copy of the BCR.** Obtain a copy of the BCR with its appendices and the Unilateral Declaration on request or by obtaining a copy of the BCR on Vestas' website.

Vestas agrees that the burden of proof to show that a Vestas Entity outside Europe is not responsible for the violation of the BCR, or that no such violation took place, will rest with the European Vestas Entity responsible for exporting the personal data to a Vestas Entity outside Europe and in no circumstances with the data subject.

In addition, claims may be brought against the Vestas Headquarter, which has undertaken to accept responsibility for and agreed to take the necessary action to remedy the acts of other

Vestas Entities outside the EEA and to pay compensation for any damages resulting from the violation of the BCR by Vestas Entities. In the event that a non-EEA Vestas entity is no longer a party to the BCR or otherwise ceases to exist, the third-party beneficiary rights provided to Data Subjects under this Section D will survive in order to ensure that the Data Subject's rights are not affected by such withdrawal from the BCR.

APPENDIX 1 – VESTAS ENTITIES SUBJECT TO THE BCR

Name	Address	Country
Vestas Wind Systems A/S	Hedeager 42 8200 Aarhus N Denmark	4;#DK - Denmark
Vestas Northern Europe A/S	Hedeager 42 8200 Aarhus N Denmark	4;#DK - Denmark
Vestas Manufacturing A/S	Hedeager 42 8200 Aarhus N Denmark	4;#DK - Denmark
Vestas Northern Europe AB	Box 31038 200 49 Malmö Sweden	14;#SE - Sweden
Vestas Norway AS	Visiting address: Ranheimsvegen 10 7044 Trondheim Norway Postal address: P.O. box 6115 Sluppen 7435 Trondheim Norway	18;#NO - Norway
Vestas Finland Oy	Vestas Finland Oy Yrittäjänkatu 17 65380 VAASA Finland	20;#FI - Finland
Vestas Nacelles Deutschland GmbH	Henry-Koch-Strasse 9-13 23570 Lübeck- Travemünde Germany	76;#DE - Germany
Vestas Deutschland GmbH	Kapstadtring 7 22297 Hamburg Germany	76;#DE - Germany
Availon GmbH	Daimlerstraße 40 48432 Rheine Germany	76;#DE - Germany
Vestas Technology (UK) Limited	MONKS BROOK ST CROSS BUSINESS PARK NEW PORT ISLE OF WIGHT PO30 5WZ UK	9;#UK - United Kingdom
Vestas Celtic Wind Technology LTD.	Exchange Tower 19 Canning Street Edinburgh, Midlothian EH3 8EH Scotland UK	9;#UK - United Kingdom

Vestas Ireland Ltd.	3 Burlington Road Dublin 4 Ireland	16;#IE - Ireland
Vestas Eólica SA	Serrano Galvache 56 Ed Madroño 28033 Madrid Spain	45;#ES - Spain
Vestas Manufacturing Spain S.L.	Avda de los Vientos, num. 2 13250 Daimiel (Ciudad Real) Spain	45;#ES - Spain
Vestas Blades Italia S.r.l.	Via Ludovico Ariosto 12 Zona Industriale 74100 Taranto Italy	69;#IT - Italy
Vestas Italia S.r.l.	Via Sardegna 40 00187 Rome Italy	69;#IT - Italy
Vestas France SAS	Tour PB5 1, avenue de Général de Gaulle 92074 Paris La "Défense France	67;#FR - France
Vestas Portugal, LDA	Avenida Diogo Cão, no. 5 Urbanização do Infantado Loures Portugal	70;#PT - Portugal
Vestas Benelux B.V.	Delta 85 6825 MN Arnhem The Netherlands	95;#NL - The Netherlands
Vestas Österreich GmbH	Vorgartenstrasse 206 B 1020 Wien Austria	96;#AT - Austria
Vestas Hellas Wind Technology S.A.	74-76 Vorjoy Ipirou Str & Konitsis 151 25 - Marousi Athen Greece	68;#GR - Greece
Vestas Poland Sp.z o.o.	Al. Niepodległości 44 70-404 Szczecin Poland	12;#PL - Poland
Vestas Service Delivery Center - Szczecin sp z.o.o.	ul. AL, Niepodległości, nr 44 70-404 Szczecin Poland	12;#PL - Poland

Vestas Bulgaria EOOD	Sofia 1000 2 Saborna Street, Entrance A, 4th floor, Bulgaria	82;#BG - Bulgaria
Vestas Czech Republic s.r.o.	Praha 8, Karolinská 661,PSC 186 00Czech Republic	97;#CZ – Czech Republic
Vestas Central Europe - Zagreb d.o.o.	Ivana Lucica 2/a 10000 Zagreb, Republic of Croatia	99;#HR - Croatia
Vestas CEU Romania S.R.L	Park Avenue Offices - 93-95 Porumbaru St. 3rd floor 011424 Bukarest, Romania	84;#RO - Romania
Vestas Rüzgar Enerjisi Sistemleri Sanayi ve Ticaret Limited Sirketi	Degirmen Sok. Nida Kulle Is Merkezi, No: 18 Kat: 14. Kozyatag1- Kadiköy/Istanbul Turkey	51;#TR - Turkey
Vestas Kompozit Kanat Sanayi Ve Ticaret Anonim Şirketi Şirketi	Panaz Mevkii Maltepe Köyü Ticaret Merkezi 3/4 Izmir Serbest Bölgesi Menemen Turkey	51;#TR - Turkey
Vestas Belgium SA	Industrieweg Noord 1118 3660 Oudsbergen Belgium	104;#BE - Belgium
Vestas Ukraine LLC	42-44 Shovkovychna Kiev 01024 Ukraine	92;#UA - Ukraine
Vestas MED (Cyprus) Ltd.	Iras 1. 1st floor P.C. 1060 Nicosia Cyprus	55;#CY - Cyprus
Vestas Central Europe d.o.o. Beograd	Bulevar Zorana Đinđića 64° 11070 Novi Beograd Rupublic of Serbia	93;#RS - Serbia
Vestas Kazakhstan LLP	9 floor, Baykonyr business-center 42 Abay ave. 050022 Almaty Republic of Kazakhstan	116;#KZ - Kazakhstan
Vestas Georgia LLC	Vestas Georgia LLC 12 Merab Aleksidze Street, Office space no. 10 0171 Tbilisi Georgia	105;#GE - Georgia

Vestas American Wind Technology, Inc.	1417 NW Everett St, Portland OR 97209, USA	81;#US - United States
Vestas Blades America, Inc.	11140 Eastman Park Drive, Windsor Colorado, 80550 USA	81;#US - United States
Vestas Nacelles America, Inc.	1500 E Crown Prince Blvd. Building N, Brighton, CO 80603, USA	81;#US - United States
Vestas Towers America, Inc.	100 Tower Road Pueblo Colorado 81004 USA	81;#US - United States
UpWind Solutions, Inc.	4863 Shawline Street, San Diego, CA 92111, USA	81;#US - United States
Vestas Canadian Wind Technology, Inc.	c/o C. Paul W. Smith 44 Chipman Hill, 10th Floor P.O. Box 7289 Stn. "A" Saint John N.B. E2L 4S6 Canada	107;#CA - Canada
Vestas Argentina S.A.	Salguero 2835, eight floor Buenos Aires Argentina	46;#AR - Argentina
Vestas do Brasil Energia Eólica Ltda	Av. Chedid Jafet, 222 4th Floor - Tower D - Vila Olímpia 04551-065 - São Paulo - SP Brazil	47;#BR - Brazil
Vestas WTG Mexico S.A. de C.V	Av Paseo de la Reforma No. 115 Piso 7 Colonia Lomas de Chapultepec 11000 Mexico, D.F.	49;#MX - Mexico
Vestas Mexicana del Viento S.A. de C.V.	Av Paseo de la Reforma No. 115 Piso 7 Colonia Lomas de Chapultepec 11000 Mexico, D.F.	49;#MX - Mexico

Vestas Chile Turbinas Eólicas Limitada	Los Militares 4611 7th floor las Condes Santiago City 7560968 Chile	71;#CL - Chile
Vestas Turbinas Eólicas de Uruguay S.A.	Edificio Ferrere Juncal 1392 Montevideo 11000 Uruguay	53;#UY - Uruguay
Vestas Wind Systems Dominican Republic, S.R.L.	La Calle Federico Geraldino 94 Esquina Calle 6, Local 1B Plaza Alaberto, Forestiero I, Ensanche Paraiso Santo Domingo Dominican Republic	58;#DO - Dominican Republic
Vestas Nicaragua S.A.	Pista Jean Paul Genie, edificio escala piso 3 Managua, Nicaragua	56;#NI - Nicaragua
Vestas Peru S.A.C.	Av. Circunvalación del Club Golf Los Incas No 154Of. 202Santiago de SurcoLimaRepublic of Peru	60;#PE - Peru
Vestas Guatemala, S.A.	Diagonal 6, 10-01 zona 10 Centro Gerencial Las Margaritas, Torre II, Oficina 402-B Ciudad de Guatemala, Republic of Guatemala	64;#GT - Guatemala
Vestas Costa Rica S.A.	San Jose - Santa Ana radial Santa Ana San Antoni de Belén km 3 Centro Empresarial Via Lindora Edificio BLP Abogados 4 Piso, 1093 Republic of Costa Rica	62;#CR - Costa Rica
Vestas Jamaica Wind Technology Ltd.	48 Duke Street Kingston Jamaica	65;#JM - Jamaica

Vestas Honduras, S.A. De C.V	Torre Nova, 8vo Nivel, Parque Comercial Los Próceres, Tegucigalpa, Francisco Morazán Republic of Honduras	;<#HN - Honduras
Vestas El Salvador, S.A. de C.V.	Colonia San Benito Calle la mascota No. 533 San Salvador Republic of El Salvador	;<#SV - El Salvador
Vestas Mediterranean A/S Sucursal Bolivia (Branch)	Santa Cruz de la Sierra Calle Cochabamba Esq. Saavedra No. 710 000A Mzno 0206 Edificio Torre Empresarial Cainco Piso 15, Barrio Casco Viejo Bolivia Plurinational State of Bolivia	
Vestas Colombia S.A.S	Domicilio Principal: Av Cra 9 No. 115-06/30 Piso 17 Bogota DC, Republic of Columbia Notificación Judicial: Cr 7 No. 7151 To A of504 Bogotá Republic of Columbia	#CO - Republic of Columbia
Vestas Wind Technology (China) Co Ltd.	No. 9 Xinxing Road West Zone of TEDA Tianjin P.R. China	38;#CN - China
Vestas Technology R&D (Beijing) Co., Ltd.	22/F, Ping An International Finance Center No.3, Xinyuan South Road, Chaoyang District, Beijing 100027, P.R. China	38;#CN - China
Vestas Wind Technology India Private Ltd	298, Old Mahabalipuram Road Sozhinganallur Chennai 119	36;#IN - India

	Tamil Nadu-600199 India	
Vestas Technology R&D Chennai Pte. Limited	8th Floor, Block A 285 Rajiv Gandhi Salai, Sholinganallur, Chennai 600 119 India	36;#IN - India
WPI India Development Private Limited	No. 298, Old Mahabalipuram Road Sholinganallur Chennai Tamil Nadu India 6000119	36;#IN - India
Vestas Mongolia LLC	"Suite 612-613, Central Tower Great Chinggis Khaan's Square 2 8th Khoroo, Sukhbaatar District Ulaanbaatar, Mongolia" Office address: 5th Floor, Suite 507, Seoul Plaza, Seoul Street, Huhdiin 100, 20/1, 14252, Ulaanbaatar, Mongolia. Phone +97699059204	109;#MN - Mongolia
Vestas Wind Technology Vietnam LLC	Suite #603 Floor 6 59A Ly Thai To Trang Tien Ward Hoam Kiem District Hanoi Socialist Republic of Vietnam	112;#VN - Vietnam
Vestas Wind Technology Pakistan (Private) Limited	112, B-1, Block E1 Gulberg III Lahore Islamic Republic of Pakistan	110;#PK - Pakistan
Vestas Korea Wind Technology Ltd.	10F, ACE Tower, 1-170. Sunhwa Doug, Jung Gu, Seoul 04517, Republic of Korea	40;#KR – Republic of Korea

Vestas Taiwan Ltd.	8F, No. 26, Section 3 Nanking East Road Taipel City 10489 Taiwan	28;#TW - Taiwan, (Republic of China)
Vestas Asia Pacific Wind Technology Pte. Ltd.	Business address: The Metropole, Tower 1, #05-02/03 North Buona Vista Drive Republic of Singapore Physical location and Registered address: 10 Collyer Quay #10-01 Ocean Financial Centre Singapore 049315. Republic of Singapore	34;#SG - Singapore
Vestas Japan Co., Ltd.	8F Metro City Kamiyacho 5-1-5 Toranomom Minato-ku Tokyo 105-0001 Japan	26;#JP - Japan
Vestas Services Philippines, Inc.	12 Floor Five Ecom Center, Harbor Drive, Mall of Asia Complex Barangay 76, Pasay city NCR, Fourth District 1300 Republic of the Philippines	42;#PH - Philippines
Vestas Shared Service A/S Philippine ROHQ	12F Five-com center Bayshore Avenue Mail of Asia Complex, Pasay City Metro Manila Republic of the Philippines	42;#PH - Philippines
Vestas Wind Technology (Thailand) Ltd.	Level 30, Bhiraj Tower at EmQuartier 689 Sukhumvit Road (Soi 35) Klongton Nuea, Vadhana Bangkok 10110 Kingdom of Thailand	32;#TH - Thailand
Vestas Wind Lanka (PVT) Ltd.	No. 5, 9th Lane, Nawala Rd Nawala Democratic Socialist Republic of Sri Lanka	;#LK - Sri Lanka

Vestas Australian Wind Technology Pty. Ltd.	Business address: Level 4 312 St Kilda Road Melbourne Victoria 3004 Australia Registered address: 10 Collyer Quay #10-01 Ocean Financial Centre 049315 Republic of Singapore	34;#SG - Singapore
Wind Power Development Australia Pty Ltd	Level 4 312 St Kilda Road Melbourne, Victoria 3004 Australia	22;#AU - Australia
Vestas New Zealand Wind Technology Ltd.	Office address: 23 Valor Drive Palmerston North 4414 New Zealand Registered address: Bell Gully, level 21 171 Featherston Street Wellington New Zealand Address for Service: 23 Valor Drive Palmerston North New Zealand	24;#NZ - New Zealand
Vestas Eastern Africa Ltd.	The Watermark Business Park Cove Court Ndege Road, Langata, Karen P.O. Box 2149-00502 Nairobi Republic of Kenya (LR No. 28134)	102;#KE - Kenya
Vestas Saudi Arabia Limited Co.	Office No. 109, 7534- Aban Center, Alghadir, King Abdulaziz Road Riyadh 13311-4672 Kingdom of Saudi Arabia	;#SA - Saudi Arabia

Vestas Southern Africa Pty. Ltd.	1st Floor 61 Katherine Street Sandton Guateng 2196 Republic of South Africa	90;#ZA - South Africa
Vestas CV Limitada	Av. Da OUA, no 4, 1st floor Cidade da Praia Republic of Cape Verde	74;#CV - Cape Verde
Vestas Jordan, Branch of Vestas Middle East, S.L.	Migrate Business Hub King Hussein Business Park Building 10, 1st Floor, Office 113 Amman Jordan	Jordan
Vestas Maroc SARLAU	Espace Porte D'Anafa 3 Rue BAB Mansour ETG 1N3 ANFACasablanca Kingdom of Morocco	72;#MA - Morocco
Vestas Senegal S.A.R.L.U	Regus Senegal 12 Boulevard Djily Mbaye Immeuble Azur 15 BP 50555 Dakar Republic of Senegal	126;#SN - Senegal
Utopus Insights, Inc.	115 east Stevens Avenue Suite 202 Valhalla New York 10595 USA	81;#US - United States
Utopus Insights India Private Limited	Ferns Icon, #1 3rd Floor KR Puram Village, Doddanekundi Uttarahalli Hobli Bengaluru, 560037 India	36;#IN - India
Vestas Future Energy DMCC	Level 54, Almas Tower JLT, Dubai UAE	;#AE - United Arab Emirates

Vestas Offshore Wind Blades UK Ltd.	West Medina Mills Stag Lane, Newport, Isle Of Wight PO30 5TR United Kingdom	9;#UK - United Kingdom
Vestas Offshore Wind Taiwan Ltd.	15F., No. 170, Dunhua N. RD. Songshan Dist., 10548 Taipei, Taiwan	28;#TW - Taiwan, (Republic of China)
Vestas Overseas Panamá S.A.	Calle 53, Torre Humbolt, Corregimiento Bella Vista, Republic of Panama	;# PA - Panama
Vestas Italia S.R.L, Egypt Branch	Office 406, Plot number 305 90th Street, 3rd & 4th Floors Green Tower, Zone 2 11583 New Cairo Egypt	#EG - Arab Republic of Egypt

APPENDIX 2 – UPDATING AND CO-OPERATION PROCEDURE

1. INTRODUCTION

This Updating and Co-operation Procedure sets out the way in which Vestas will:

- communicate changes to the BCR to the competent European supervisory authorities, to employees and to the Vestas Entities bound by the BCR; and
- co-operate with the European supervisory authorities in relation to the BCR.

2. CHANGES TO THE BCR

Vestas will without undue delay communicate any material changes to the BCR to the competent supervisory authority and to any other relevant European supervisory authorities where required, including revisions due to change of applicable data protection legislation in any European country, through any legislative, court or European supervisory authority measure. Vestas will also provide a brief explanation of the reasons for any notified changes to the BCR.

Further, Vestas will once a year via the competent supervisory authority provide the relevant European supervisory authorities with an overview of changes made, which are not considered to be substantial, along with a brief explanation of the reasons for the changes. This includes changes to the list of entities covered by the BCR set out in Appendix 1 to the BCR.

4. COMMUNICATING AND LOGGING CHANGES TO THE BCR

The BCR contains a change log which sets out the date of revisions to the BCR and the details of any revisions made. The Head of Data Privacy will maintain an up to date list of the changes made to the BCR and the Vestas Entities bound by the BCR. Vestas will make this information available to European supervisory authorities on request.

Vestas will communicate all changes to the BCR, whether administrative or material in nature to:

- the Vestas Entities bound by the BCR; and
- the individuals who benefit from the BCR via <https://www.vestas.com/>.

5. NEW VESTAS ENTITIES

Vestas will maintain an up to date list of the Vestas Entities and ensure that all new Vestas Entities are bound by the BCR before a transfer of personal information to them takes place.

Vestas will once a year communicate any changes to the list of Vestas Entities to the competent supervisory authority. Further, Vestas will communicate an up to date list of entities to the competent supervisory authority and any other European supervisory authority upon request.

6. CO-OPERATION WITH EUROPEAN SUPERVISORY AUTHORITIES

Where required, Vestas will make relevant personnel available for dialogue with a competent European supervisory authority in relation to the BCR.

Vestas will:

- Abide with any decisions made by competent European supervisory authorities on any data protection law issues that may affect the BCR; and

- Comply with the views of the EDPB as outlined in its published guidance on Binding Corporate Rules.

Vestas will provide upon request copies of the results of any audit of the BCR to a competent European supervisory authority.

Vestas acknowledges that:

- where any Vestas Entity is located within the jurisdiction of a European supervisory authority, that particular European supervisory authority may audit that Vestas Entity for the purpose of reviewing compliance with the BCR, in accordance with the applicable law of the country in which the Vestas Entity is located; and
- in the case of a Vestas Entity located outside Europe, a European supervisory authority may audit that Vestas Entity for the purpose of reviewing compliance with the BCR in accordance with the applicable law of the European country from which the personal data is transferred under the BCR.

Vestas agrees to abide with a formal decision of the competent European supervisory authority on any issues relating to the interpretation and application of the BCR.

APPENDIX 3 – AUDIT PLAN AND PROCEDURE

1. PURPOSE

The purpose of this Audit Plan and Procedure is to set out the overall personal data processing activities of Vestas that must be audited to ensure compliance with the Vestas incorporated Binding Corporate Rules (the 'Vestas BCR').

2. SCOPE

To comply with the GDPR Vestas must have in place a structured process for both documenting and auditing compliance with the Vestas BCR. This document only focuses on audit of compliance with the Vestas BCR. Documentation of the various processes and procedures used in Vestas to ensure compliance with the Vestas BCR is set out in internal procedures and guidelines.

3. ROLES & RESPONSIBILITIES

According to the GDPR Article 24(1) Vestas shall:

- “implement appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with this Regulation. Those measures shall be reviewed and updated where necessary.”

Vestas is also obligated to ensure that its entities comply with the internal rules on processing of personal data and transfer of personal data as set out under the Vestas BCR. Vestas may use other accredited internal/external assessors to assist them with conducting audits of the Vestas BCR.

4. STRUCTURE

4.1 Data controller or data processor

The applicable requirements under the Vestas BCR depend on whether Vestas is the data controller (i.e. the party determining the purpose and means of the processing of personal data) or the data processor (i.e. the party processing personal data on behalf of the data controller) when processing personal data. In most cases Vestas will act as a data controller. Therefore, this document includes a form that must be used for processing activities where Vestas is the data controller.

4.2 Three layers of compliance

Auditing of compliance with the Vestas BCR will for each processing activity involve three layers of compliance:

- Internal compliance
 - Vestas' employees' compliance when processing personal data (Including the internal compliance with the Vestas BCR)
- Supplier compliance
 - Vestas' supplier's compliance with the GDPR when processing personal data on behalf of Vestas

- System compliance
 - Do the systems used by Vestas to process personal data comply with the requirements of the GDPR

4.3 Timing and scope of assessment of compliance

Vestas must conduct regular audits at least on an annual basis, and within a shorter timeframe at the request of, or as determined necessary by the Head of Data Privacy.

The Head of Data Privacy will determine the scope of auditing on a case-by-case basis using a risk-based analysis. The risk-based analysis will take into account relevant criteria, e.g.:

- Areas of current regulatory focus;
- Areas of specific or new risk for the business;
- Areas with changes to the systems or processes used to safeguard personal data;
- Areas where there have been previous audit findings or complaints;
- The period since the last review; and
- The nature, method and location of the personal data processed.

For the compliance with the GDPR, this Audit Plan and Procedure also contains a template audit plan (see below section 6), which may be used by Vestas to ensure that all general aspects are covered by the audit.

4.4 Report on audit

On completion of the compliance assessment the Head of Data Privacy will make the report and findings available to the Data Privacy Committee together with details of any remedial action required, recommendations and timescales for remedial action to be taken, which will escalate to Vestas Board of Directors if necessary.

The Head of Data Privacy will bring any issues or instances of non-compliance to the attention of the Data Privacy Committee and the management of the relevant Vestas Entity. It is the responsibility of the management of the relevant Vestas Entity to ensure that any corrective actions to ensure compliance with the BCR are implemented within a reasonable timescale. In the event that such corrective actions do not take place, the Head of Data Privacy will report the matter to the Data Privacy Committee.

Upon the request and subject to applicable law, Vestas will provide the results of the assessment of compliance with the GDPR, including the Vestas BCR, to a European supervisory authority of competent jurisdiction upon request.

The Head of Data Privacy will be responsible for liaising with the European supervisory authorities for the purpose of providing the information outlined above.

In addition, Vestas acknowledges that European supervisory authorities may audit Vestas Entities for the purpose of reviewing compliance with the Vestas BCR, including the Updating and Co-operation Procedure.

5. AUDIT OF VESTAS' COMPLIANCE AS A DATA CONTROLLER

5.1 Audit form

[Data processing activity]
Internal compliance
Vestas departments' role in the data processing activity
[Describe the Vestas departments that are processing personal data]
Data minimisation
Have the following principles been adhered to? <ul style="list-style-type: none">• Personal data may only be collected for specified, explicit and legitimate purposes.• Personal data may only be processed if adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.• Personal data may only be stored and used for as long as it is necessary for the purposes for which the personal data are collected.
Legal basis to process the personal data
Does Vestas have a legal basis to process the personal data? The legal basis may be: <ul style="list-style-type: none">• the data subject has given his explicit consent;• processing is necessary for the performance of a contract to which the data subject is a party;• process is necessary for compliance with a legal obligation; or• processing is necessary for the purposes of the legitimate interests pursued by Vestas and these interests are not overridden by the interests of the data subject; If Vestas is processing Special Categories of Personal Data the legal basis may be: <ul style="list-style-type: none">• the data subject has given his explicit consent; or• processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law.
Data retention
Is there a defined data retention period?

Personal data may only be stored and used for as long as it is necessary for the purposes for which the personal data are collected.
Observed the rights of the data subjects
<p>Has Vestas provided the data subjects with the information required under the GDPR?</p> <ul style="list-style-type: none"> • Identification and contact details of the Vestas Entity and contact details of the Head of Data Privacy, if any. • The purpose of and specific reference to the legal basis for the processing. • The categories of personal data concerned, e.g. contact information, CV, criminal records etc. • The recipients or categories of recipients of the personal data, e.g. business partners or Vestas affiliates. • If the data is transferred to countries outside of the EU/EEA (including Norway) and reference to the suitable safeguards, e.g. BCR or Commission's standard contractual clauses. • Planned retention period. • Specific rights of the data subject. • The right to withdraw consent (if the processing is based on consent). • The source of the data (if the data is collected from a third party). • Right to lodge a complaint with a public authority. • Whether the person is required to provide the data and the possible consequences if he/she doesn't. • Information if automated decision-making is being used.
Has Vestas observed the data subjects' right of access?
Has Vestas observed the data subjects' right to data portability, if relevant?
Has Vestas observed the data subjects' right to rectification?
Has Vestas observed the data subjects' right to be forgotten?
Has Vestas observed the data subjects' right to object?
Sharing of data with other Vestas group entities
<p>If personal data is shared with other group entities does Vestas have a data processor agreement in place with such group entities?</p> <p>Is the sharing of personal data with other group entities necessary to fulfil the purpose for which the personal data was collected?</p>

If personal data is transferred under the BCR is the BCR principles complied with?
Maintain records of processing activities
Is the data processing activity included in Vestas' record of processing activity? Is the record of processing activities updated?
Data protection impact assessment, if relevant
Has Vestas made a data protection impact assessment in accordance with GDPR Article 35 (if such is required)?
Organisational security measures
Are Vestas employees aware of the confidential nature of the personal data? Have the employees of Vestas been offered data protection training? [Other?]
Any outstanding claims?
Are there any outstanding claims from customers or data subjects, which relates to the processing activity?
Supplier compliance
Supplier's role in the data processing activity
[Describe suppliers that are processing personal data on behalf of Vestas]
Data processor agreements
Have Vestas entered into a data processor agreement with the relevant suppliers?
Legal basis to transfer personal data (if relevant)
If Vestas is transferring personal data to a supplier outside of the EU/EEA, is there a legal basis to transfer the personal data? The legal basis may be: <ul style="list-style-type: none"> • The European Commission's standard contractual clauses: • The EU-U.S. Privacy Shield (if the supplier is located in the US and certified); • The third country is a safe country (http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm); • The data subject's explicit consent.
Knowledge of the use of sub-processors and their data processing locations

<p>Does Vestas know if the suppliers are using sub-contractors that have access to personal data?</p> <p>Does Vestas know the identity of such sub-processors?</p> <p>Does Vestas know in which countries such sub-processors are processing personal data?</p> <p>Do the suppliers have an obligation to inform Vestas of the use of new sub-contractors that will process personal data on behalf of Vestas?</p> <p>Does Vestas have a right to object to the use of such new sub-contractors?</p>
<p>Right to audit (including sub-processors)</p>
<p>Does Vestas have a right to audit the suppliers that process personal data on behalf of Vestas?</p> <p>Does Vestas have a right to audit the suppliers' sub-contractors that process personal data on behalf of Vestas?</p> <p>Is Vestas' audit right limited in any way?</p>
<p>Implemented appropriate technical and organisational security measures</p>
<p>Have the suppliers implemented appropriate technical and organisational security measures?</p> <p>Technical and organisational security measures will include:</p> <ul style="list-style-type: none"> • pseudonymisation and encryption of personal data; • ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; • ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; • a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing. <p>Does the supplier comply with all agreed security measures?</p>
<p>System compliance</p>
<p>Implemented appropriate technical and organisational security measures</p>
<p>Do the systems have appropriate technical and organisational security measures?</p> <p>Technical and organisational security measures will include:</p> <ul style="list-style-type: none"> • the pseudonymisation and encryption of personal data; • the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;

<ul style="list-style-type: none"> the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
Data protection by default
Do the systems comply with the requirement of data protection by default as set out in GDPR Article 25?
Data protection by design
Do the systems comply with the requirement of data protection by design as set out in GDPR Article 25?
Data retention
Do the systems support the data retention period identified for the data processing activity?

6. AUDIT PLAN

Activity	Vestas department	Next audit	Date of last audit	Responsible
[**]	[E.g. People and Culture]	[Time of next audit, e.g. Q42017]	[E.g. 1-12-2016]	[Overall responsible for each audit]

7. FURTHER INFORMATION

If further information is needed about this procedure or the BCR in general, please contact:

Contact	
Email:	dataprivacy@vestas.com
Address:	Vestas Wind Systems A/S, Hedeager 42, 8200 Aarhus N, Denmark.

8. REVIEW OF PROCEDURE

This Procedure will be reviewed and considered in line with applicable European Data Protection Laws, including any relevant case law.

9. DEFINITIONS

Term	Definition
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Head of Data Privacy	Refers to the person who is responsible for overseeing the daily compliance.
Data Privacy Committee	Refers to the forum (of which the Head of Data Privacy is a part of) that takes decisions and ensures support of the work performed by the compliance board and the Head of Data Privacy.
Personal Data	Means any information relating to an identified or identifiable natural person which is processed by manual or automatic means and related to employees, candidates, third party contractors, interns, Board members, customers (former, present and prospective) and suppliers (former, present and prospective).
Process(ing)	Means any operation that the Vestas Group performs on Personal Data, whether by manual or automatic means. Includes i.e. the collection, use, disclosure, transfer, deletion, amendment and storage of Personal Data.
European data protection laws	Means the European Union (EU) Regulation 2016/679 (General Data Protection Regulation, "GDPR") and any law enacted by Member States
Vestas Entity	Vestas Wind System A/S and those of its subsidiaries and affiliates that are party to the BCR.

10. REFERENCE DOCUMENTS

Compliance Verification Protocol APPENDIX 5

APPENDIX 4 – DATA SUBJECT REQUEST AND COMPLAINT HANLING PROCEDURE

1. PURPOSE

The purpose of this Data Subject Request and Complaint Handling Procedure (“Procedure”) is to outline the procedure and ensure compliance with the GDPR when a data subject has submitted a request as part of exercising their individual rights under the GDPR.

2. SCOPE

The data subject can request access to information being processed by Vestas about the data subject. Furthermore, all data subjects have the right to request rectification, erasure, restriction of processing or to object to processing or to request the portability of their personal data (jointly referred to as “Request” in this procedure). Vestas will accommodate such Request to the extent required under applicable European Data Protection Laws and in accordance with this Procedure.

This Procedure does not confer rights nor override any legal provisions which either require or prevent disclosure of personal data under European Data Protection Laws. If provisions of applicable European Data Protection Laws deviate from the process as described in this Procedure, the provision under European Data Protection Laws will prevail.

3. ROLES & RESPONSIBILITIES

The Head of Data Privacy is responsible for managing the overall guidelines for handling Requests from data subjects and overseeing compliance with this Procedure in accordance with the European Data Protection Laws, including the GDPR.

4. PROCEDURE ON THE EXERCISING OF INDIVIDUAL RIGHTS

4.1 Relevant Vestas Entity

Requests will be dealt with by the compliance responsible assigned to the relevant Vestas Entity.

4.3 Written request

The data subject making a Request may do so via dataprivacy@vestas.com or by contacting Vestas’ Head of Data Privacy, Local Data Privacy Responsible or in ServiceNow.

Any Requests received via other channels than the above, must be directed to Vestas’ Head of Data Privacy.

4.4 No fees

Under normal circumstances no fee will be charged by Vestas for the processing of a Request.

4.5 Response

A Vestas Entity must respond to a request without undue delay and in any event within one (1) month of receipt of the request or complaint. The period for responding to the request may be extended by two (2) further months where necessary, taking into account the complexity and number of requests. The Head of Data Privacy/Local Data Privacy Responsible will inform the data subject of any such extension within one(1) month of receipt of the request or complaint, together with the reasons for the delay.

4.6 Confirm the identity

The data subject making the Request must provide proof of identity before a Request can be handled by the Vestas Entity. Vestas may ask for information which Vestas may reasonably require in order to confirm the identity of the data subject (e.g. name, nature of relationship with Vestas, email address) making the Request in order to locate the information which that data subject seeks and prevent disclosure of personal data relating to another data subject.

5. PROCEDURE

5.1 Receipt of Request

Upon receiving a Request, the Head of Data Privacy may either manage the Request or direct the Request to the relevant Local Data Privacy Responsible. If a Local Data Privacy Responsible receives a Request directly from a data subject, the Local Data Privacy Responsible shall notify the Head of Data Privacy and initiate the procedure as set out below.

If any employee or subcontractor of Vestas receives a Request from a data subject, they must forward the Request to the Head of Data Privacy immediately upon receipt indicating the date on which the Request was received together with any other information which may assist the Local Data Privacy Responsible and the Head of Data Privacy to handle the Request.

The Request does not have to be written or mention data protection law to qualify as a Request subject to this Procedure.

5.2 Initial Steps

The Local Data Privacy Responsible or Head of Data Privacy, as applicable, will make an initial assessment of the Request to decide whether it is a valid request according to applicable data protection laws and whether any further information, including proof of identity, is required.

The Local Data Privacy Responsible or Head of Data Privacy, as applicable, will then contact the data subject in writing to confirm receipt of the Request, seek proof of identity of the data subject or further information, if required, or decline the Request if one of the exemptions as described below apply.

If the Request requires Vestas to take any action, i.e. rectify, erase, restrict or extract personal data in an electronic copy, further requirements to the Request may apply, please see section 5.5 below.

5.3 Exemptions to Request for access

A Request for access to personal data may be refused where the Request is made to a Vestas Entity established within a Member State and relates to the use or collection of personal data by that entity, if the refusal to provide the information is consistent with the law of the Member State in which the Vestas Entity is established.

5.4 The Search and the Response

The Head of Data Privacy or the Local Data Privacy Responsible, as applicable, will arrange a search of all relevant electronic and paper filing systems based on the character of the Request.

Based on the Request and other information received by the data subject, the Head of Data Privacy or the Local Data Privacy Responsible will assess the category of the data subject and the category of personal data, which is processed by Vestas.

When the Head of Data Privacy or Local Data Privacy Responsible, as applicable, has made a categorisation of the Request, the Head of Data Privacy/Local Data Privacy Responsible will contact the relevant process or system owners. The designated process or system owners shall assist the Head of Data Privacy or Local Data Privacy Responsible in collecting data that is being processed by Vestas about the data subject and which is relevant to the Request of the data subject. The Head of Data Privacy or Local Data Privacy Responsible will set a deadline for this task.

The Local Data Privacy Responsible shall consult the Head of Data Privacy and in respect of any complex cases involve further the Data Privacy Committee. In particular, where the Request includes information relating to third parties or where there is a risk that the release of personal data may compromise commercial confidentiality or legal proceedings.

The personal data requested will be collated by the Head of Data Privacy or Local Data Privacy Responsible, as applicable, and a cover letter will be prepared by the Head of Data Privacy or Local Data Privacy Responsible which includes the relevant information to be provided to the data subject.

In certain circumstances, e.g. where providing the information in written form is not possible or it is in the interest of the data subject to do so, the information may be provided in an oral format. In such circumstances the data subject may be offered the opportunity to have access to the information by inspection in attendance of a Vestas employee appointed by the Head of Data Privacy or to receive the information in another form.

5.5 Access requests

A data subject may submit a request for access to Vestas under this Procedure to:

- Be informed whether Vestas holds and is processing personal data about that data subject.
- Be given at least the following information:
 - the purposes of the processing,
 - the categories of personal data concerned,
 - the recipients or categories of recipients to whom the personal data are disclosed,
 - the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period,
 - the existence of the right to request from the Vestas Entity rectification or erasure of personal data or restriction of processing of personal data concerning the data subject, or object to such processing, the right to lodge a complaint with a European supervisory authority,

- where the personal data are not collected from the data subject, any available information as to their source, and
- whether automated decision making, including profiling, will be applied to the personal data, including meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject, and
- communication in an intelligible form of the personal data held by the Vestas Entity.

5.6 Request for rectification, deletion or portability of personal data

If a request is received for the rectification, erasure, restriction or data portability of that individual's personal data, such a request must be considered and dealt with as appropriate by the Local Data Privacy Responsible and the Head of Data Privacy in accordance with the requirements set out below.

5.6.1 Request for rectification of personal data

If the data subject requests the rectification of personal data, this must be done accordingly without undue delay, if Vestas is satisfied that the rectification is appropriate and justified in the data subject's Request. The rectification may take into account the purposes of the processing, and may include providing supplementary statements on the character of the personal data. Subject to the assessment of the Head of Data Privacy, all recipients of unrectified data must be informed about the rectification, unless deemed impossible or if it involves a disproportionate effort by Vestas. Vestas will restrict the processing of personal data, with the exception of storage, until it has been properly assessed whether the personal data is accurate.

5.6.2 Objection to the processing of personal data

If the Request involves objection to processing, the matter will be referred by the Head of Data Privacy. Where the processing undertaken by Vestas is required in accordance with European Data Protection Laws, the Request will be rejected on these grounds. Vestas will restrict the processing of the personal data, with the exception of storage, until it has been assessed whether the legitimate grounds overrides the interest of the data subject.

If the request involves objection processing of personal data which is collected for the purpose of direct marketing, Vestas must cease to process the personal data unless an exemption under European Data Protection Laws applies.

5.6.3 Request for data portability

When the processing of personal data is based on consent or performance of a contract as a legal basis, and the processing is carried out by automated means, the data subject has the right to request the personal data concerning him or her, which he or she has provided to Vestas, transmitted to another controller. Such data portability is to be done in a structured, commonly used and machine-readable format e.g. USB-stick, zipped file in an email. If technically feasible, the personal data must be transferred directly from Vestas to another controller upon the data subject's request. Upon receiving a request for direct transfer of personal data from Vestas to another controller, please contact the Local Data Privacy Responsible for approval of such action.

6. COMPLAINT HANDLING

6.1 Who handles complaints?

Any individual whose personal data has been processed under the BCR may make a complaint to the Head of Data Privacy at dataprivacy@vestas.com.

The Head of Data Privacy will together with the Local Data Privacy Responsible handle all complaints arising under the BCR. The Head of Data Privacy/Local Data Privacy Responsible will liaise with relevant business units to investigate the complaint and will coordinate the preparation of a response.

6.2 What is the response time?

A Vestas Entity must respond to a complaint without undue delay and in any event within one (1) month of receipt of the complaint. The period for responding to the complaint may be extended by two (2) further months where necessary, taking into account the complexity and number of requests. The Head of Data Privacy/Local Data Privacy Responsible will inform the data subject of any such extension within one (1) month of receipt of the complaint, together with the reasons for the delay.

6.3 When a complainant disputes a finding

If the complainant disputes the response provided or any aspect of a finding, and notifies the Head of Data Privacy/Local Data Privacy Responsible accordingly, the Head of Data Privacy/Local Data Privacy Responsible will assess and if necessary refer the matter to VWS' General Counsel or the Data Privacy Committee.

The Head of Data Privacy/Data Privacy Committee will review the case and advise the complainant of his/her decision either to accept the original finding or to substitute a new finding. The Head of Data Privacy will respond to the complainant within one (1) month of the referral or any such shorter period as may be required by local law or regulation. If, due to the nature of the matter or other compelling reasons a satisfactory response cannot be provided within this period, the Local Data Privacy Responsible/Head of Data Privacy will inform the individual having filed a complaint accordingly, including as to when a response can be expected. However, a response must be provided within three months of receipt of the complaint. If the complaint is upheld, the Head of Data Privacy will arrange for any necessary steps to be taken as a consequence.

Anyone whose personal data is subject to European Data Protection Laws and is processed by Vestas under the BCR has the right to complain to a European supervisory authority and/or to lodge a claim with a court of competent jurisdiction as explained in the BCR. These rights will apply whether or not that person has first made a complaint to Vestas.

7. FURTHER INFORMATION AND REVIEW OF PROCEDURE

For further information on this Procedure or any general information about the BCR, please contact:

Contact	
Email:	dataprivacy@vestas.com
Address:	Vestas Wind Systems A/S, Hedeager 42, 8200 Aarhus N, Denmark.

This Procedure will be reviewed and considered in line with applicable European Data Protection Laws and relevant case law.

APPENDIX 5 – COMPLIANCE VERIFICATION PROTOCOL

1. INTRODUCTION

Vestas is required to verify from time to time that personal data is being processed in compliance with all aspects of the BCR and this Protocol describes how Vestas will achieve this.

2. APPROACH

2.1 Timing and scope of assessment of compliance

The Head of Data Privacy will conduct assessments of compliance with the BCR (whether in general or in relation to a specific element or elements of the BCR). The Head of Data Privacy may use other accredited internal/external assessors for assistance.

Compliance assessments will take place:

- annually in accordance with Vestas' general audit procedure/s; and/or
- within a shorter timeframe at the request of, or as determined necessary by the Head of Data Privacy.

The Head of Data Privacy will determine the scope of any assessment performed using a risk-based analysis. This will take into account relevant criteria, for example: areas of current regulatory focus; areas of specific or new risk for the business; areas with changes to the systems or processes used to safeguard personal data; areas where there have been previous audit findings or complaints; the period since the last review; and the nature, method and location of the personal data processed.

2.2 Report

On completion of the compliance assessment the Head of Data Privacy will make the report and findings available to the Data Privacy Committee together with details of any remedial action required, recommendations and timescales for remedial action to be undertaken, who will escalate to Vestas' Board of Directors, if necessary.

The Head of Data Privacy will bring any issues or instances of non-compliance to the attention of the Data Privacy Committee and the management of the relevant Vestas Entity. It is the responsibility of the management of the relevant Vestas Entity to ensure that any corrective actions to ensure compliance take place within a reasonable timescale. In the event that such corrective actions do not take place, the Head of Data Privacy will escalate the matter to the Data Protection Committee.

Upon request and subject to applicable law, Vestas will upon request provide copies of the results of any assessment of compliance with the BCR to a European supervisory authority of competent jurisdiction.

The Head of Data Privacy will be responsible for liaising with the European supervisory authorities for the above purposes.

In addition, Vestas acknowledges that European supervisory authorities may audit Vestas Entities for the purpose of reviewing compliance with the BCR in accordance with the terms of the Updating and Co-operation Procedure.

Cyber & Information Security Policy

(Appendix to the Binding Corporate Rules Policy)



Vestas abides by effective governance that enables appropriate Cyber and Information Security proportionate to risk



At the senior management level, Vestas appoints a Security Officer who remains accountable for Cyber and Information Security.



Annually, Vestas continues to inform the markets about the status of Cyber and Information Security effective in the Organisation



Policy Statement for Data Security

Vestas Entities, subject to the Binding Corporate Rules, are required to adhere to security and risk policies, as well as any other data security procedures relevant to the entity.

The Entities shall conform to appropriate technical and organisational measures to protect Personal Identifiable Information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to Personal Identifiable Information transmitted, stored, or otherwise processed.

Considering the state of the art and the costs of implementation, Vestas will provide such measures proportionate to the risks represented by the processing and the nature of Personal Identifiable Information, including the principles of privacy by design and privacy by default.

APPENDIX 7 – OVERVIEW OF DATA PROCESSING ACTIVITIES COVERED BY THE BCR

1. INTRODUCTION

1. This document provides an overview of the data processing activities that the BCRs cover.

Processing activities	Purpose of processing	Categories of data subjects	Categories of personal data	Categories of recipients (in scope of the BCR)	International transfer destination	Place of storage	Time limits for erasure
Business administration and Compliance and regulatory matters	This processing activity covers the use of personal data in relation to the management of Vestas' compliance and handling of regulatory matters in relation to statutory filing systems and management insider lists.	Employees, customer employee and business partners.	Name Private address Seniority Signature Insider list Title	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Business administration Ethics and conduct	This processing activity covers the use of personal data in relation to complaints and reports on violations of applicable law, ethical policies, code of conduct or internal rules.	Employees, customer employee and business partners.	Name Private address Title	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Business administration Corporate matters	This processing activity covers the use of personal data in relation to the management of corporate matters, including management of shareholders, employee elections, workers councils, board of directors, management structure and key positions.	Employees, customer employee and business partners.	Birth place Birthday Cohabitants name and birth date/place Company name (if personally owned company) Copy of driver's license Copy of passport Country Criminal records ¹ Current location Dismissal E-mail Function Gender Health information Initials Marital Status Name Nationality Passport date of issue Passport issuer Passport number Passport validity date Phone number Signature	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.

			Tax information Title				
Business administration Finance management	This processing activity covers the use of personal data in relation to internal finance and accounting processes, including management of invoicing, payments, purchase orders, bookkeeping, budgeting and project funding.	Employees, customer and employee of business partners.	Bank account data, phone, mail, address	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Business administration - IT management	This processing activity covers the use of personal data in relation to the provision of internal IT services and functions, including access management, logging and monitoring of IT usages, license management, asset management and support.	Employees and customer employee.	Name, contact details, initials, usage data.	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Business administration Security management	This processing activity covers the use of personal data in relation to security management, including access control, fraud prevention, security incident management, security monitoring.	Employees, customer and employee of business partners.	Current location Function Location workplace Name Nationality Passport date of issue Passport issuer Passport number Passport validity date Purchase order (ref) Signature Sub-contractor e-mail Sub-contractor name Sub-contractor phone no. Supplier bank details Supplier contract information Supplier information Supplier name Supplier phone no. User ID Video recording	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Business intelligence market intelligence competitors and individuals	This processing activity covers the use of personal data in relation to collection and analysis of market intelligence, including individuals with competitors,	Employees, customer and employee of business partners.	Company Country E-mail Function Name Phone number	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.

	authorities or decision makers or other organisations.						
Customer management	This processing activity covers the use of personal data in relation to the management of customer relationships and contracts, including individuals in the customer's organisation.	Customer employee and employee of business partners.	Company Country E-mail Name Organizational division Phone number	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary workplace storage Denmark.	Following local law requirements and principle 3C of the BCR.
Employment management Complaint and disciplinary actions management	This processing activity covers the use of personal data in relation to the management of complaints regarding employee behaviour and disciplinary actions taken against an employee.	Employees.	Absence Company Competences Country Department End of employment Function Initials Location workplace Manager Name Notice of termination Other absence Salary Seniority Start of employment Title Warnings	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary workplace storage Denmark.	Following local law requirements and principle 3C of the BCR.
Employment management - File management	This processing activity covers the use of personal data in relation to the management of employee files, including filing of employment related documentation on employee files.	Employees.	Absence Accident details Achieved carrier goals Bank information Benefits Bonus letter Company CV Department Dismissal E-mail Employee No. Employment terms End of employment Function Initials Marital Status No. of children Salary Seniority Sick leave Tax information Title Warnings	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary workplace storage Denmark.	Following local law requirements and principle 3C of the BCR.
Employment management Time and attendance	This processing activity covers the use of personal data in relation to the management of employee time recording and attendance, including recording of sick leave.	Employees.	Personal Identification Number, Initial, SAP ID	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary workplace storage Denmark.	Following local law requirements and principle 3C of the BCR.

	vacations, maternity leave, other absence etc.						
Exit and termination	This processing activity covers the use of personal data in relation to the management of employee resignations, termination of employees and outplacement activities.	Employees.	Benefits Company Dismissal Employee No. Employment terms End of employment Function Initials Location workplace Manager Name Reason for dismissal Salary Seniority Title Union Agreement Warnings	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Hire and induction - Hire and onboarding	This processing activity covers the use of personal data in relation to the creation of employment contracts, completions of applicable forms and the onboarding procedure applied in respect of new employees.	Job candidate and employees.	Bank information Benefits Birth place Birthday Copy of passport Country CV Department E-mail Employee No. End of employment Initials Location workplace Manager Name Marital Status Nationality No. of children Private address Residence Salary Seniority Social security number Title	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Hire and induction - Introduction and training	This processing activity covers the use of personal data in relation to the management of induction activities carried out in relation to new employees, including management of induction plans, mandatory training and surveys.	Job candidate and employees.	Company Country CV Department E-mail Employee No. Initials Manager Name Strength and weaknesses Test results Title Training attendance	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Learning - Learning management	This processing activity covers the use of personal data in relation to the management of	Employees.		Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.

	training activities, including management of participants, training completion, surveys and evaluations, trainers and training certificates.						
Marketing and communications and PR	This processing activity covers the use of personal data in relation to the management of communications and public relations activities, including management of contact details of key individuals and information regarding journalists and decision makers.	Customer employee and business partners.	Company Country CV Department E-mail Employee No. Initials Manager Name Strength and weaknesses Test results Title Training attendance	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Marketing and communications Digital marketing and analysis	This processing activity covers the use of personal data in relation to the management of digital marketing and analysis activities, including social media marketing and analysis, managing mailing lists, newsletters and seasonal greetings, collection and analysis of web site cookies, management and analysis of user activity on websites and campaign sites.	Customer employee and business partners.	Birthdate Gender Name Passport number Seniority Title	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Marketing and communications Employer branding	This processing activity covers the use of personal data in relation to Vestas' employer branding activities, including management of Vestas ambassadors, management and use of branding materials pictures which include individuals, management of external student lists, and management and analysis of social media follower data.	Customer employee and business partners.	Birthdate Gender Name Passport number Seniority Title	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Marketing and communications	This processing activity covers the use of personal	Customer employee and	Birthdate Gender Name	Vestas entities	All countries stated in section 1.2.	Primary place of	Following local law requirements

Events and promotions	data in relation to the management and conduct of marketing events and promotions, including management of stakeholder events such as customer events or events with politicians, authorities and NGOs or management of direct promotions.	business partners.	Passport number Seniority Title	covered by the BCR.		storage is Denmark.	and principle 3C of the BCR.
Mobility and travel - Relocation assistance	This processing activity covers the use of personal data in relation to the management of employee relocations and assistance to relocating employees.	Employees.	CV E-mail Employment terms Name Phone number Salary Seniority Start of employment Title	Vestas entities covered the BCR.	All countries stated in section 1.2.	Primary storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Mobility and travel - Travel management and tracking	This processing activity covers the use of personal data in relation to the management of travel activities, including travel booking, management of expenses and reimbursements, visa application management, travel insurance etc.	Employees.	Company of passport Copy of passport Cost center Country Current location Customer contact Customer name Customer site Department E-mail Employee No. End date for work permit Initials Location workplace Manager Name Nationality No. of children Partner's name Passport date of issue Passport issuer Passport number Passport validity date Password Payment terms Phone number Residence Salary Seniority Social security number Start of employment	Vestas entities covered the BCR.	All countries stated in section 1.2.	Primary storage is Denmark.	Following local law requirements and principle 3C of the BCR.
P&C reporting and forecasting	This processing activity covers the use of personal data in relation to internal forecasting and reporting on human resource statistics.	Employees.	Benefits Company Cost center Country Department Employee No. Initials Name	Vestas entities covered the BCR.	All countries stated in section 1.2.	Primary storage is Denmark.	Following local law requirements and principle 3C of the BCR.

Payroll and benefits management	This processing activity covers the use of personal data in relation to the management of payroll and benefits, including management of salaries, payroll, pensions, benefits, company cars, reporting to public authorities and benchmarking of salaries.	Employees.	Salary Title Absence Accident details Admin name Bank information Benefits Birth place Birthday Bonus letter Emergency contact Employee salary code Employee workplan End of employment Illness Initials Marital Status Notification of illness Payment terms Sick leave Title	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Performance and potential assessment People development and people review	This processing activity covers the use of personal data in relation to the conduct and evaluation of people development and people review, including management of evaluations, development plans and career plans.	Employees.	Achieved carrier goals Achieved personal goals Carrier goals Company Competences Country CV E-mail Employee No. Function Gender Initials Location workplace Manager Name Nationality Performance Performed according to expectations Personal goals Personality test result Personality tests Seniority Test reports Test results Title Training attendance User ID Username	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.
Performance and potential assessment Talent management and planning	This processing activity covers the use of personal data in relation to the management of talent pools and succession planning.	Employees.	Achieved carrier goals Achieved personal goals Carrier goals Company Competences Country Current location CV Department	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary place of storage is Denmark.	Following local law requirements and principle 3C of the BCR.

			E-mail Employee No. Function Gender Initials Location workplace Manager Name Nationality Performance Performed according to expectations Personal goals Personality test result Personality tests Phone number Seniority Start of employment Strength and weaknesses Test reports Test results Title Training attendance User ID Username				
Recruiting Background check	-This processing activity covers the use of personal data in relation to performance of background checks of potential candidates, including criminal background checks ² and credit checks.	Job candidate.	Background check results	Vestas entities covered by the BCR.	All countries stated in section 1.2.	Primary storage in Denmark.	Following local law requirements and principle 3C of the BCR.
Recruiting - Temps and direct hires	This processing activity covers the use of personal data in relation to hiring and management of temps and hourly direct hires.	Employees of suppliers.	Bank information Birth place Birthday Country Current location CV Delivery address Employee No. Gender Initials Manager Marital Status Name Nationality Private address Salary Social security number Start of employment Title	Vestas entities covered by the BCR.	All countries stated in section 1.2.		Following local law requirements and principle 3C of the BCR.
Recruiting Application management	-This processing activity covers the use of personal data in relation to the management of application and potential candidates,	Job candidates.	Birth place Birthday Carrier goals Country Current location CV Gender Name	Vestas entities covered by the BCR.	All countries stated in section 1.2.		Following local law requirements and principle 3C of the BCR.

	including management of candidate pools, job boards, electronic applications and physical applications.		Nationality Phone number Previous employment details Private address Private email Private phone no. Reference Salary Salary Expectations				
Suppliers and business partners - Supplier and contract management	This processing activity covers the use of personal data in relation to the management of suppliers, contractors, consultants and contracts, including management and storage of contracts, management of master data on suppliers, consultants and contractors and evaluation of suppliers, consultants and contractors.	Customer employee and employee of business partners.	Name and title	Vestas entities covered by the BCR.	All countries stated in section 1.2.		Following local law requirements and principle 3C of the BCR.

2. The total list of international transfer destinations include:

1. Denmark
2. Argentina
3. Australia
4. Austria
5. Belgium
6. Brazil
7. Bulgaria
8. Canada
9. Cape Verde
10. Chile
11. China
12. Columbia, Republic of
13. Costa Rica
14. Croatia
15. Cyprus
16. Czech Republic
17. Dominican Republic
18. Egypt
19. El Salvador Finland
20. France
21. Georgia
22. Germany
23. Greece
24. Guatemala
25. Honduras
26. India
27. Ireland
28. Italy
29. Jamaica
30. Japan

31. Jordan
32. Kazakhstan
33. Kenya
34. Korea, Republic of
35. Mexico
36. Mongolia
37. Morocco
38. Netherlands
39. New Zealand
40. Nicaragua
41. Norway
42. Pakistan
43. Panama
44. Peru
45. Philippines
46. Poland
47. Portugal
48. Romania
49. Saudi Arabia
50. Senegal
51. Serbia
52. Singapore
53. South Africa
54. Spain
55. Sri Lanka
56. Sweden
57. Taiwan, Province of China
58. Thailand
59. Turkey
60. Ukraine
61. United Kingdom
62. United States
63. Uruguay
64. Vietnam