

## Privacy & Cookies

Understand how we collect and use personal data.

### VIRIDIEN Data Privacy Policy

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VIRIDIEN S.A., with registered offices at 27 avenue Carnot, 91300 Massy, and all VIRIDIEN Group entities (“**VIRIDIEN**”) are committed to maintaining the principles of integrity and trust with respect to the privacy of your Personal Data.

VIRIDIEN agrees to comply in all material respects with all applicable privacy laws, rules and regulations, including but not limited to the European Regulation (EU) 2016/679 “on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing the EU Data Protection Directive” (the “**GDPR**”) and any implementing legislation enacted by the member states of the European Union (“**European Laws**”).

A separate Group Employee Data Privacy General Instruction applies to VIRIDIEN’s employees specifically (including the third-party employees subcontracted to VIRIDIEN, “the **Employees**”).

Third Parties include amongst others, applicants, clients, subcontractors, vendors/suppliers, investors, insurers and visitors to VIRIDIEN’s website as well as the Employees (such parties referred to herein individually as a “**Third Party**” or collectively as “**Third Parties**”).

By providing Personal Data as below defined to VIRIDIEN, Third Parties consent to the disclosure and/or collection and use of information as set forth herein unless otherwise required.

#### 1. Definition

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“**Personal Data**” and “**Personal Information**” are used interchangeably herein and refer to information that can be used to identify a Third Party either on its own or in combination with other readily available data (e.g., the individual’s name, title, work location, home address, date of birth, compensation, benefits or family members).

“**Sensitive Data**” means Personal Data which reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data, or data which concern health, sex life or sexual orientation.

Please note that Personal Data and Sensitive Data may have different definitions depending on your country.

#### 2. Personal Data Collected

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VIRIDIEN collects Personal Data entered by Third Parties on VIRIDIEN's website or through cookies used by VIRIDIEN as specified below, or given in any other way, such as writings or phone calls during any transactional or administrative communications.

Subject to applicable laws and regulations, Personal Data and/or Personal Information collected may include, but is not limited to, the following:

- Personal Data such as date of birth, gender, marital status, and identification numbers including social security, driver's license, tax identification, passport numbers and resume
- Contact information such as name, company name, address, phone number, fax number and e-mail address
- Financial and billing information such as billing name and address, payment information (which might include credit card and/or bank account information)
- Additional information such as title, department name, and additional company information, such as shareholder names, annual revenues, number of employees or industry

### 3. Intended Use of Personal Data

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#### A. Purpose and Legal Basis of the Processing

VIRIDIEN uses Personal Information collected from Third Parties for the purposes of VIRIDIEN's operations and activities management, training programs, and recruiting job applicants.

VIRIDIEN collects and uses the Personal Data of Third Parties for the execution of its contracts with them, to comply with its legal obligations, on the basis of Third Parties' consent and for the purposes of the legitimate interests of VIRIDIEN.

Failure to provide this information may prevent or delay the fulfillment of these obligations.

VIRIDIEN processes Third Parties' Personal Data on the following legal basis:

- **Performance of a contract** – the use of Third-Party Personal Data may be necessary to perform the contract that you have with us
- **Legitimate interests** – VIRIDIEN may use Third-Party Personal Data for its legitimate interests, for example to improve our products and services or our marketing practices by monitoring and measuring engagement
- **Consent** – VIRIDIEN will rely on Third Parties' consent to use Personal Data for marketing purposes
- **Legal obligation** – to comply with VIRIDIEN legal obligations

Sensitive Data shall be processed only where required by local law and only where there is a legitimate purpose for VIRIDIEN in doing so.

#### B. Recipient of Personal Data

To fulfill the purposes mentioned in Article 3.A of the Data Privacy Policy, VIRIDIEN may disclose Personal Data collected on a Third Party on a limited and as-needed basis, including without limitation for example, service providers who advise VIRIDIEN on compensation and benefit programs or administer such programs for VIRIDIEN, insurers, or as otherwise required by law or detailed in this Data Privacy Policy.

In the event that VIRIDIEN or any portion of its assets are acquired, sold or transferred, VIRIDIEN may disclose Personal Data with the company involved to perform the operation and complete the transition, on a limited basis in compliance with applicable law.

In certain circumstances, VIRIDIEN may be requested or required to disclose Personal Data in response to valid legal process or under applicable laws and/or regulations. Such circumstances may include a search warrant, subpoena, court order or other request from a government or regulatory authority or agency, including to meet national security or law enforcement requirements. VIRIDIEN reserves the right to disclose such information in response to any such legitimate government or regulatory request or requirement.

VIRIDIEN does not disclose or sell any Personal Data received from a Third Party (individual or legal entity) for marketing or any other commercial purpose.

### **C. International Transfer of Personal Data**

Subject to applicable laws and/or regulations, Personal Data may be transferred to any country in the world where VIRIDIEN does business, including countries where privacy laws may be more or less protective than the privacy laws where a Third Party is located.

In particular, VIRIDIEN may transfer Personal Data of Third Parties located in the European Economic Area to countries located outside the European Economic Area. Where appropriate, VIRIDIEN will ensure that Third Parties are informed of such transfer and that appropriate transfer mechanisms are in place.

### **D. Onward Transfer and Choice “Opt In – Opt Out”**

VIRIDIEN does not intend to disclose or use Personal Data received from a Third Party in a manner not described herein. However, should at any time VIRIDIEN need to use Personal Data for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a non-agent Third Party, VIRIDIEN will provide individuals with an opportunity to choose whether to have their Personal Data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be sent to: [data.privacy@viridiengroup.com](mailto:data.privacy@viridiengroup.com)

If Personal Data that qualifies as Sensitive Data is to be used for a new purpose that is different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a Third Party, VIRIDIEN will obtain the Third Parties' explicit consent prior to such use or disclosure, except if the use or disclosure is in the vital interests of the Third Party or another person; necessary for

the establishment of legal claims or defenses; required to provide medical care or diagnosis; necessary to carry out VIRIDIEN's obligations in the field of employment law; or related to data that are manifestly made public by the individual.

If the Third Party does not consent explicitly to such disclosure or use, VIRIDIEN will take all reasonable measures to remove the Third Party's Personal Data from the intended disclosure or use.

When the processing of Personal Data is outsourced to a Third-Party processor, VIRIDIEN will select reliable Third Parties, and data processing will be subject to a written agreement between VIRIDIEN and the relevant Third-Party processor. This written agreement will require that the Third-Party processor: (i) has at least the level of security measures in place as those implemented by VIRIDIEN, and (ii) will process Personal Data in strict compliance with VIRIDIEN's specific written instructions only for the purpose(s) mentioned in the said agreement. VIRIDIEN shall be liable in case the Third Party does not process the Personal Data in an appropriate manner.

## **E. Personal Data Security**

VIRIDIEN maintains appropriate technical and organizational measures to process Personal Data collected from Third Parties in a secure-access environment and in a manner that complies in all material respects with applicable laws and industry standards to guard Personal Data against loss, destruction, misuse, improper disclosure, and unauthorized access or modification. These safeguards are routinely tested internally and periodically audited by outside firms.

## **F. Personal Data Retention Period**

Personal Data is not kept for longer than necessary to fulfill the purpose for which it was collected. Personal Data will generally not be retained longer than the term of Third Parties' contractual relationship with VIRIDIEN, unless there is any legal or regulatory provision requiring otherwise.

## **G. Personal Data Accuracy**

VIRIDIEN relies on the accuracy and integrity of Third Parties' Personal Data in order to comply with its business obligations. VIRIDIEN expects Third Parties to inform it of any changes to their Personal Data, such as changes to contact information, address, or any information affecting benefits or services provided by VIRIDIEN.

VIRIDIEN makes reasonable efforts to ensure that the Personal Data it collects and maintains is reliable for its intended use, and is accurate, complete for the purposes for which it was collected.

## **H. Rights Over Personal Data**

Third Parties have a right to request access to their Personal Data and to request the rectification of any incorrect or incomplete data. Third Parties also have the right to data portability, to request the erasure of their Personal Data, to restrict the processing of their Personal Data, as well as to object to their processing by VIRIDIEN, unless

VIRIDIEN demonstrates compelling legitimate grounds. Third Parties which are not satisfied with the way VIRIDIEN processes their Personal Data have the right to lodge a complaint with the competent data protection authority.

Should a Third Party have any request for assistance regarding the exercise of their rights as above mentioned, the Third Party shall use the following e-mail address: [data.privacy@viridiengroup.com](mailto:data.privacy@viridiengroup.com)

VIRIDIEN will allow a Third Party to review the Third Party's Personal Data that VIRIDIEN stores and maintains about that Third Party in his or her personnel file, including information relevant to the use and disclosure of that person's Personal Data. However, in certain limited circumstances VIRIDIEN may not be able to provide a Third Party with access to all of his or her Personal Data where such refusal is permitted or required by applicable law or regulation.

Subject to all applicable laws and regulations, should any Personal Data concerning a Third Party be found to be no longer needed, to be inaccurate or incomplete, or if a Third Party has withdrawn consent, VIRIDIEN will take reasonable steps to erase or correct or update the information it maintains unless applicable laws or regulations exempt VIRIDIEN from doing so.

These rights can vary depending on your country.

## **I. Website**

An individual can access VIRIDIEN's website without providing any Personal Data. However, should you choose, you may provide us with certain Personal Data. VIRIDIEN may use this information:

- To correspond with you
- To allow you to participate in features or services we offer on this website
- To provide you with a subscription or newsletter
- To transmit your resume within VIRIDIEN for possible employment opportunities

If you subscribe to any service provided by VIRIDIEN through VIRIDIEN's website or otherwise, and you wish to terminate that subscription and have all Personal Data about you removed from any list we maintain, please contact VIRIDIEN by sending an e-mail to [webmaster@viridiengroup.com](mailto:webmaster@viridiengroup.com), informing us of your request. We will promptly make reasonable efforts to remove all Personal Data about you from our data banks. In addition, e-mail communications from VIRIDIEN inform the recipient how to stop receiving further communication.

VIRIDIEN does not automatically log Personal Data about visitors to our website. VIRIDIEN does not use cookies to store Personal Data, nor does VIRIDIEN link non-Personal Data stored in cookies with Personal Data about specific individuals. We may collect certain non-Personal Data from a visitor to our website such as what browser was used, what pages were accessed, and the Internet address of the service provider in order to compile statistics and analyze this data for trends.

## J. Use of Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

VIRIDIEN's website uses the following cookies to understand how the site is being used in order to improve the user experience.

Cookie Name	Expiration	Category	Description
ARRAffinity Same Site	1 Year	Strictly Necessary Cookie	This cookie is used to ensure that requests from a client are routed to the same origin server during a browsing session, typically used in load balancing scenarios to maintain session integrity with sticky sessions.
ARRAffinity	1 Year	Strictly Necessary Cookie	This cookie is set by websites run on the Windows Azure cloud platform. It is used for load balancing to make sure the visitor page requests are routed to the same server in any browsing session.
ApplicationGatewayAffinityCORS	1 Year	Strictly Necessary Cookie	This cookie is used to maintain a user session by the server in a load balanced environment, to ensure all requests from a user during the session are sent to the same server.
ApplicationGatewayAffinity	1 Year	Strictly Necessary Cookie	This cookie is used to maintain a user session by the server in a load balanced environment, to ensure the user has a consistent experience.
_ga	1 Year	Performance Cookies	This cookie name is associated with Google Universal Analytics which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the site's analytics reports. By default, it is set to expire after 1 year, although this is customizable by website owners.

_ga_XXXXXXXXXX	1 Year	Performance Cookies	This cookie is used by Google Analytics to identify and track an individual session with your device.
GS_FLOW_CONTROL	1 Year	Performance Cookies	This cookie is used to ensure concurrent requests for map services from geoserver are shared equally among users in order to provide fair access to the server

### Google Analytics

VIRIDIEN uses this to understand how the site is being used in order to improve the user experience. User data is all anonymous. You can find out more about Google's position on privacy as regards its analytics service at: <https://policies.google.com/privacy?hl=en>.

To opt out of being tracked by Google Analytics across all websites, visit: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

### How to withdraw your consent?

On your first connection to the website <https://viridiengroup.com/> you will be asked to give your consent to the use of non-strictly necessary cookies. If you subsequently wish to change your choices, you may delete or disable cookies on the Preference Center available by clicking on the "Cookies Settings" button available on all pages of the website.

However, you should keep in mind that deleting or disabling cookies may lead to inconvenience while using our website that would not have happened if you consented to the use of cookies.

## **K. Enforcement, Recourse and Liability**

VIRIDIEN will monitor its compliance with this Data Privacy Policy and address questions and concerns regarding its adherence.

As a general principle, VIRIDIEN is committed to resolve complaints about collection and/or use of Personal Data.

Any inquiry or complaint regarding this Data Privacy Policy can be referred to a VIRIDIEN Privacy Officer at [data.privacy@viridiengroup.com](mailto:data.privacy@viridiengroup.com), or to the Ethics Committee at [ethicscommittee@viridiengroup.com](mailto:ethicscommittee@viridiengroup.com)

In compliance with the European Laws, VIRIDIEN will strive to acknowledge any complaint or enquiry and take appropriate action to remedy any raised issue within one (1) month of receipt. However, if VIRIDIEN is unable to satisfactorily resolve the

issue, VIRIDIEN will inform the concerned Third Parties of the reasons preventing the implementation of measures to resolve such issue.

Regarding the rights over Personal Data as described in Article 4.H of this Data Privacy Policy, Third Parties have also the possibility to lodge a complaint to the EU local data protection authorities. To contact the authorities directly, please visit: [ec.europa.eu](https://ec.europa.eu). If outside of the EEA Third Parties may lodge a complaint with the relevant authority.

Under the GDPR, Third Parties who consider that the processing of their Personal Data infringes their rights have the right to an effective judicial remedy.

## 5. Changes to the Data Privacy Policy

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VIRIDIEN reserves the right to make changes to this Data Privacy Policy from time to time in order to reflect changes in legal or regulatory obligations, or changes in the manner in which VIRIDIEN manages personal data. This Data Privacy Policy was last updated in June 2024.