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CORPORATE POLICY on Data Processing

The Group Policy – Data processing sets out PJCE Company’s commitments to respect and support Data processing and outlines fundamental principles to be implemented in our operations. We expect all PJCE employees to follow this policy and consistently apply its standards in all business dealings. We will strive to fully adopt these principles in all operations in which PJCE has management control. We will endeavour to engage proactively with business partners, governments and other stakeholders to uphold the highest standards of human rights throughout the value chain.

To ensure compliance with currently applicable rules on the processing of personal data, particularly the General Data Protection Regulation, the Danish Data Protection Act and related orders and instructions PJCE has issued this policy on data processing defining handling of data between:

PJ Circular Engineering A/S (hereinafter referred to as the “PJCE”) and 3rd party processing personal data belonging to the PJCE (hereinafter referred to as the “Data Processor”)

The Data Processing policy is a supplement to the PJCE MANAGEMENT System

The Data Processor shall carry out the tasks for the purposes set out in the PJCE MGMT and will accordingly be granted access to personal data belonging to the PJCE in its capacity as a data controller. The Data Processor shall exclusively process data to fulfil its obligations according to the PJCE MGMT and is thus considered a data processor.

The data processing covers the categories of data subjects (hereinafter the “Data Subjects”) and types of personal data (hereinafter the “Personal Data”) listed in Annex A.

PJCE shall always be responsible for the lawfulness of the processing of Personal Data, which the PJCE has collected and to which the PJCE has granted access to The Data Processor under the PJCE MGMT and the Data Processing Policy.

PJCE shall always be responsible for fulfilling the duty of disclosure to the Data Subjects regarding the Personal Data.

PJCE shall always be responsible for handling requests from the Data Subjects per the Data Subjects’ individual rights of freedom, as described in Articles 15-22 of the Data Protection Regulation, including for example the Data Subjects’ right of access and rights to rectification, deletion, and objection.

The Data Processor shall act in accordance with the PJCE’s instructions and only to the extent necessary for the Data Processor to fulfil its obligations according to the PJCE MGMT and the Data Processing policy.

The Data Processor shall not be required to answer requests from the Data Subjects regarding access, rectification, blocking or deletion, but shall assist the PJCE to comply with the PJCE’s obligations according to applicable legal requirements. This obligation applies only to the PJCE’s reasonable requests and only to extent that the PJCE cannot fulfil its obligations without the Data Processor’s assistance. The Data

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Processor is entitled to receive reasonable compensation for its efforts under this provision.

Data Processor shall:

- Notify the PJCE of requests from the Data Subjects to the extent that these concern the Data Subjects' individual rights regarding access, rectification, blocking, and deletion.
- Notify the PJCE of possible personal data security breaches concerning Personal Data, cf. Article 33(2) of the Data Protection Regulation.
- Notify the PJCE of inquiries from the Danish Data Protection Agency to the Data Processor, if the inquiries concern processing activities covered by the PJCE MGMT and the Data Processing policy.
- Notify the PJCE if the Data Processor considers that the instruction from the PJCE constitutes a breach of the legal requirements applicable to the data processing.

The Data Processor shall have implemented the necessary technical and organizational security measures required to prevent accidental or illegal destruction, loss or deterioration of Personal Data, and to prevent the Personal Data from being disclosed to unauthorized persons, misused or otherwise treated in a manner that constitutes a breach of applicable legislative requirements.

The Data Processor shall ensure that its employees are subject to professional confidentiality obligations.

The Data Processor has established procedures rendering it possible to restrict access to Personal Data to the employees, who are required to process Personal Data in order to perform the Main Contract and the Data Processing policy.

The Data Processor shall only use its own data processors (hereinafter the "Subcontractors") based on written agreements that ensure that the Subcontractors provide at least the same level of protection as the level specified in the Data Processing policy. At the signing of the Data Processing policy, PJCE simultaneously confirms its general acceptance of the Data Processor's use of Subcontractors.

The Data Processor shall not carry out any of the following activities without the prior written consent of the PJCE:

- disclose Personal Data to any third party,
- use Personal Data for its own purpose, or
- transfer Personal Data to countries outside the EU and the EEA, which do not appear on the list of sub-processors.

Unless required under EU law or the law of an EU Member State. Before any processing or transfer, which may result from a statutory obligation, the Data Processor shall notify the PJCE of the content of such statutory obligation, unless the legislation prohibits such notification based on significant public interest.

At PJCE's request, the Data Processor may provide information to the PJCE once a year to document that the Data Processor has implemented the necessary technical and organizational security measures. The Data Processor may choose to present only the most recent version of its procedures, provided these procedures are dated and were introduced not more than one year before the request.

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If the supervisory authority wants to inspect the measures implemented by the Data Processor under the Data Processing policy, the Data Processor shall – subject to receiving a reasonable notice hereof – make time and resources available for this purpose.

The Data Processor is liable for any damage or loss caused by data processing in breach of applicable data protection regulation, or due to the Data Processor having acted outside or contrary to lawful instructions from PJCE according to the Data Processing policy. The Data Processor shall indemnify, hold harmless and defend PJCE against any direct loss or damage, including but not limited to administrative fines, which are caused by the Data Processor's infringement of the Data Processing policy or applicable law in relation to the performance of the Data Processing policy.

The indemnification includes any infringement attributable to the Data Processor, including infringements committed by employees or any other representatives of the Data Processor or its employees.

The Data Processing policy shall enter into force as per stated below on page 4.

Immediately upon the termination of the Data Processing policy, the Data Processor shall return, transfer, and/or delete the Personal Data according to the PJCE's instructions. The Data Processor may refuse to delete the Personal Data to the extent that this follows from an express legal obligation for the Data Processor under applicable law.

The Data Processing policy is subject to Danish law. In the event of a dispute between the Parties arising out of or in connection with the Data Processing policy, the Parties shall seek in good faith to negotiate an amicable solution. If a solution cannot be achieved from such negotiations within 30 days, the dispute shall be subject to the jurisdiction of the Danish courts.

Each of the Parties may request that the Data Processing policy be renegotiated if the data protection legislation currently in place is amended to an extent that results in a significant change to the terms and conditions of the Data Processing policies. The purpose of the negotiations shall be to adapt the wording of the Data Processing Policy to the amended legislation.

ROLES AND RESPONSIBILITIES

Each Executive Vice President, Senior Vice President and Vice President reporting to the CEO of PJCE is responsible for ensuring that this Group Policy is duly communicated and implemented, and that the employees within his/her area of responsibility are familiar with and follow this Group Policy.

All PJCE employees are individually responsible for reading, understanding and following this Group Policy. Violations against the Group Policy can lead to disciplinary action, up to and including termination.

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Annex A

Subject	Personal data	Covered by agreement	Remarks
Users of PJCE Websites	Support data, including e-mail, telephone number, name, username and e.g. user password.	YES	
	Behavioural data, including geo-tracking, IP addresses and cookie data.	YES	
Customer data	Test data, including e-mail, phone no., name, username and possibly user password.	YES	PJCE files, client data, etc.
PJCE Employees	Recruitment data, which may be accessed in connection with system integration or other IT services, but which is not processed physically.	YES	

Name of company: PJ Circular Engineering A/S
 Authorized Signatory: Anne-Mette Elsborg, Group CEO
 Date: September 16th, 2020
 Place (where signed): Copenhagen, Denmark
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