

February 2025

Privacy policy for shareholders etc.

This privacy policy applies to the processing of personal data relating to shareholders and their proxies and advisors when convening and holding general meetings in Solar A/S, CVR no. 15908416, Industrivej Vest 43, DK - 6600 Vejen ("the Company") and in connection with recordings in the Company's register of shareholders. The purpose of the policy is to provide information about how the Company collects, processes and stores your personal data and to provide information about for which purpose and on which background the processing takes place.

Solar A/S is the data controller, which implies that the Company is responsible for your personal data being processed correctly. The Company is also referred to as "we" throughout this policy.

1. Identifying shareholders and maintaining the register of shareholders

In order to identify our shareholders and maintain the register of our shareholders, we collect information about each shareholder, including name, address, email address, buy/sell dates, shareholding, voting rights and pledges.

We keep the personal data as long as you are a shareholder, and for a period of one year after we become aware that you are no longer a shareholder.

2. Notice of general meetings

When we convene a general meeting, we process such personal data about you that are registered in the register of shareholders, including name, address and email address.

The notice is published as a company announcement via Nasdaq Copenhagen and on the Company's website and is sent by email or ordinary mail to shareholders who have requested to receive a copy. In continuation hereof, other general meeting documents will be published on our website, including the agenda, and any full proposals and forms for granting proxy or postal voting.

The notice will be available on the website for five years, and the other documents will be available until the next annual general meeting.

Please note that our website may be accessed from countries outside the EU/EEA.

We keep notices, agendas, any full proposals and the forms for granting proxy or postal voting until it is no longer necessary for us to keep this information with a view to protecting our and the shareholders' interests. This information will, however, be kept for a period of at least ten (10) years, after which it will be deleted.

3. Notification of attendance in general meetings and granting of proxy and postal voting

When you provide notification of your and your potential advisor's attendance at the general meeting or grant a proxy to a third party, the Company issues an admission card, which will contain certain personal data about you, any proxy and/or advisor representing you or the proxy, including name, address, email address and shareholding. Admission cards will be made available either electronically or will be sent by email or by ordinary post. In that connection, we will process your personal data based on the information registered about you in the register of shareholders.

Personal data are also processed if you vote at the general meeting, including by way of postal voting. If you grant a proxy to a third party and/or provide notification of the attendance of an advisor, we will also collect and process personal data about such persons (name and address).

We keep information on registrations, proxies and votes until it is no longer necessary for us to keep this information with a view to protecting the Company's and the shareholders' interests. This information will, however, be kept for a period of at least ten (10) years, after which it will be deleted.

4. Screening of EU, UK or US sanctioned individuals

In certain cases, the Company is obliged to ensure that persons subject to economic sanctions from the EU, the UK or the US do not exercise shareholder rights during the general meeting. In order to fulfil such legal obligations, the Company may process personal data of shareholders attending the general meeting and check the data against relevant sanctions lists. Such data include details of the shareholder's name and home address as recorded in the register of shareholders.

5. Submitting questions prior to the general meeting

When submitting written questions prior to the general meeting, you must document your status as a shareholder or proxy and in this respect, collection and processing of your personal data will take place. If questions are answered in writing, the questions, including your name, and the Company's answers will be made available and presented at the general meeting, and potentially be included in the minutes of meeting.

We keep information on questions submitted until it is no longer necessary for us to keep this information with a view to protecting the Company's and the shareholders' interests. This information is however, expected to be kept for a period of at least five (5) years, after which it will be deleted.

6. Submitting proposals/issues prior to the general meeting

The Company will collect and process your personal data and the contents of your proposal if you request a specific issue to be included on the agenda for the general meeting. If your request fulfils the requirements of the Danish Companies Act, the proposal and your name will be included (i) on the agenda and in any full proposals, (ii) on the forms for granting proxy or postal voting, and (iii) in the minutes of meeting. These documents will be published in accordance with the provisions of this policy.

7. The right to speak and ask questions at the general meeting

If you choose to speak at the general meeting, e.g. in order to ask questions, you may be requested to document your status as a shareholder or a proxy. In this respect, personal data about you will be processed. Your statement and name may be included in the minutes of the general meeting.

8. Specific information about virtual general meetings

If you attend a general meeting virtually, we will process your personal data, including name, address, email address, shareholding and IP address, when you are granted access to the general meeting, and when you exercise your rights, including to speak and vote at the general meeting. If you cast your vote electronically, we furthermore process your personal data when we confirm the receipt of your vote.

We keep the information until it is no longer necessary for us to keep this information with a view to protecting the Company's and the shareholders' interests. This information is however, expected to be kept for a period of at least five (5) years, after which it will be deleted.

9. Minutes of the general meeting

After the general meeting, the Company will prepare minutes of the general meeting. Therefore, in addition to the initial collection and processing, additional processing of your personal data may take place, e.g. in connection with submitting proposals or exercising the right to speak at the general meeting.

The minutes of the general meeting will be available at our website for a period of 10 years. Thus, the minutes will be available to both shareholders and the public during this period.

We may archive minutes of a general meeting until we no longer need the information, for purposes of protecting the Company's and the shareholders' interests, including for the purpose of documenting the deliberations and resolutions passed at the general meeting. This means that minutes are not deleted.

10. Third parties with whom we share personal data

We may share the personal data of shareholders, proxies and advisors with relevant employees of the Company and with relevant third party advisors and service providers (data processors).

In connection with general meetings and keeping of the Company's register of shareholders, VP Securities A/S, CVR no. 21 59 93 36 ("VP") will process your data on behalf of the Company. We have entered into a Data Processing Agreement with VP e.g. to ensure

that they have implemented appropriate technical and organisational measures for ensuring protection of your personal data.

11. Basis and purpose of processing

Activity	Legal basis	Purpose
Collection and storing will take place in order to identify our shareholders and maintain the register of our shareholders (item 1).	GDPR, Article 6(1)(c) (compliance with statutory requirements): Compliance with the requirements of the Danish Companies Act for maintaining the register of shareholders.	Maintaining a statutory register of shareholders.
Processing will take place in connection with notice of general meetings (item 2).	GDPR, Article 6(1)(c) (compliance with statutory requirements): Compliance with the requirements of the Danish Companies Act for notice of general meetings.	Being able to send notice of the general meeting to the shareholders, including in order for the shareholders to be able to exercise their rights at the general meeting.
Collection and processing will take place in connection with notification of attendance in general meetings and granting of proxy and postal voting (item 3).	GDPR, Article 6(1)(c) (compliance with statutory requirements): Compliance with the legal obligations set out in the Danish Companies Act.	Ensuring that the relevant persons are granted access to the Company's general meeting and that they can exercise their rights.

Processing in connection with the potential exercise of shareholder rights during the general meeting (item 4).	GDPR Article 6(1)(c) (compliance with legal obligations): Compliance with legal obligations under applicable law, including regulations.	To ensure that persons subject to economic sanctions from the EU, the UK or the US do not exercise shareholder rights during the general meeting.
Collection and processing will take place in connection with submission of questions prior to the general meeting (item 5).	GDPR, Article 6(1)(f) (legitimate interests): The Company's legitimate interest in being able to identify you as a shareholder, to enable you to exercise your right as a shareholder to ask questions.	Being able to identify the shareholder.
Collection and processing will take place in connection with submission of proposals/issues prior to the general meeting (item 65).	GDPR, Article 6(1)(f) (legitimate interests): The Company's legitimate interest in being able to identify you as a shareholder, to enable the you to exercise your right as a shareholder to submit a proposal for inclusion on the agenda.	Being able to identify the shareholder.

Solar A/S

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<p>Collection and processing will take place in connection with the right to speak and ask questions at the general meeting (item 7).</p>	<p>GDPR, Article 6(1)(f) (legitimate interests): The Company's legitimate interest in being able to identify you as a shareholder, to enable you to exercise your right as a shareholder to speak and ask questions at the general meeting.</p>	<p>Being able to identify the shareholder.</p>
<p>Collection and processing will take place in connection with virtual attendance in the general meeting, including exercising the rights as a shareholder (item 8)</p>	<p>GDPR, Article 6(1)(f) (legitimate interests): The Company's legitimate interest in being able to identify the you as a shareholder, to enable you to exercise your right as a shareholder to speak, including to ask questions and vote at the general meeting.</p> <p>GDPR, Article 6(1)(c) (compliance with statutory requirements): Compliance with the Company's obligation to send a confirmation of vote to a voting shareholder.</p>	<p>Ensuring that the relevant persons are granted access to the Company's general meeting and that they can exercise their rights electronically.</p> <p>Being able to send the statutory confirmation of vote to the voting shareholders.</p>

<p>Processing will take place in order to prepare, publish and archive minutes of the general meeting (item 9).</p>	<p>GDPR, Article 6(1)(c) (compliance with statutory requirements): The Danish Companies Act requires minutes to be taken, and the processing is thus necessary in order for the Company to comply with a legal obligation.</p>	<p>Complying with the Company's legal obligation to prepare minutes of general meetings.</p>
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12. Your rights

You can obtain further information on the personal data, which we store, and process about you by sending an email to gdpr@solar.dk. You may furthermore at any time object to your personal data being processed by us, request that your personal data be rectified or deleted, and you are entitled to obtain a copy of your personal data or ask questions regarding our processing of your personal data by sending an email to the above email address.

If you wish to complain about the processing of your personal data, please contact the Danish Data Protection Agency.