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# Website Privacy Notice

Last Reviewed: May 2024

Version: 2.0

## Lightsource bp Privacy Notice

This privacy notice describes how we collect, store and use your personal data and information about you when you use our (“Services”) such as when you:

- Visit our websites.
- Express an interest in keeping up to date with Lightsource bp news and/or our projects.
- Provide us feedback through our Community Engagement events.
- Engage with us in other related ways including when you engage with us as a supplier or counterparty, for business development purposes and marketing.

Lightsource bp is responsible for the personal data and information we collect and process for our own purposes. We’re committed to maintaining the security and privacy of the personal data and information we process through our website, through interactions with prospects, third party providers and suppliers, industry partners or members of the public.

## Contacting us

Lightsource bp has appointed a Data Protection Officer who is available to handle any questions, or queries in relation to how we process your personal data or information, to exercise your rights, make a complaints, or to discuss our practices, please use the following details:

- **Email:** [privacy@lightsourcebp.com](mailto:privacy@lightsourcebp.com)
- **Post:** FAO Data Protection Officer, Level 7, 33 Holbourn, London, EC1N 2HU

## What personal data do we collect

Personal data or information, identifies an individual. This could include information you provide to us directly, but also information gathered from other sources including publicly available sources and third party providers. The types of personal data and information that we collect and process are:

**Identity and Contact Information:** first name, last name, title, postal address and status, email address and telephone numbers, driving licence, passport and photographs.

**Employment or Company Data:** employment details including employment status, job title, company name, duration of employment, employment address, telephone number, previous employment details, criminal record information, sanctions, security clearances held.

**Financial Data:** bank account details, tax information (including identifiers such as Social Security Number or National Insurance Number).

**Technical Data:** device identifiers such as internet protocol (IP) address, usernames or similar identifiers and login data.

**Health and Medical Information:** information relating to accident reporting (e.g., injuries).

## How we will collect your data

We use different methods to collect data from and about you including:

**Personal data and information provided by you:** The personal data and information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products you use. We will typically collect personal data and information directly from you via our website or in-person, such as during an industry or community event.

**Third parties or publicly available sources:** To enhance our ability to contact you regarding relevant services and to maintain and update our records, we may obtain information about you from other sources, such as public databases, Landbrokers, and from other third parties suppliers.

**Information automatically collected:** We automatically collect certain information when you visit, use, or navigate our website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes. Like many businesses, we also collect information through cookies and similar technologies, which you can read more about in our [Cookie Policy](#).

## Why we collect your personal data and information

The following table sets out why we process your personal data and information and our lawful basis for processing your personal data, in accordance with applicable Data Privacy and Protection Legislation. We may rely on more than one lawful basis for processing your personal data depending on the context of the processing activity.

Purpose	Lawful Basis	Personal Data Categories	Third Party Recipients
<p><b>Review and respond to your online enquiries:</b> When you submit an enquiry via an online webform, this information is reviewed by a member of our support team and passed onto the relevant department.</p>	<p>This is performed under our legitimate interests for us to respond to your enquiry.</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact Details</li> <li>Enquiry Information</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> <li>Instinctif Partners</li> </ul>
<p><b>Engage with prospective clients:</b> We process business contact information of prospective clients and opportunities, which may initially be collected via sales meetings, business cards, verbally, events we may host, speak at, or attend.</p> <p>We may obtain information from third parties or publicly available sources, including those outlined under the section 'How will we collect your personal data?'</p>	<p>This processing is carried out for our legitimate interests for us to promote our Services to your organisation.</p> <p>This information may also be processed for the performance of a contract, or to take steps prior to entering a contract, when you are a named signatory within the contract..</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Contact Details</li> <li>Job title</li> <li>Organisation</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> <li>Salesforce</li> <li>Adapt IQ</li> <li>Explore (France)</li> </ul>
<p><b>Enter into an agreement to provide you with our Services:</b> including development, financing, building, or operating renewable energy sites.</p> <p>Lightsource bp services are generally provided to organisations and business however, personal data and information of their staff may be processed.</p>	<p>This is performed under our legitimate interests.</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Business contact details</li> <li>Signatures</li> <li>Bank Details</li> <li>Job title</li> <li>Organisation</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> <li>Salesforce</li> <li>Adapt IQ</li> <li>IFS</li> <li>SAP</li> <li>DocuSign</li> <li>Cetora Digital S.A (Brazil)</li> <li>Law Firms (varies per country or jurisdiction)</li> <li>Datasite</li> </ul>
<p><b>Communicate and consult with you regarding upcoming projects and developments:</b> Where there is a project in your area our community engagement team will communicate with you in order to provide additional information about the project or development and to obtain your feedback.</p>	<p>This process is necessary to comply with our legal obligations.</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Email address</li> <li>Address</li> <li>Marketing Preferences</li> <li>Comments, Opinions and Feedback</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> <li>Salesforce</li> <li>Adapt IQ</li> <li>Various community engagement consultancies (varies per country or jurisdiction)</li> </ul>

In some countries, we are also required to share your feedback publicly via our websites. When we share this information, we will not share your personal data or information, this will be limited to your comments, opinions and feedback only.			
<b>Manage Financial Accounting and Administration:</b> Our financial management and accounting Services process basic client contact information to fulfil our accounting requirements. This ranges from invoices, account details, statement of works, terms and conditions and bank details.	This processing is necessary for the performance of a contract with you, or to meet our legal obligations for financial reporting.	<ul style="list-style-type: none"> <li>Name</li> <li>Business contact details</li> <li>Email conversations</li> <li>Signatures</li> <li>Client and Supplier Bank Details</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> <li>IFS</li> <li>SAP</li> </ul>
<b>Identify website usage trends:</b> We will process data about how you use this careers site. This is primarily through the use of cookies. Further information can be found within our cookie policy.	<p>This processing performed when you provide consent for non-essential cookies through our cookie banner.</p> <p>You can withdraw consent at any time via the cookie preference centre.</p>	<ul style="list-style-type: none"> <li>IP address</li> <li>Unique Visitor IDs</li> </ul>	<ul style="list-style-type: none"> <li>Instinctif Partners</li> <li>Google</li> <li>KLIQ Interactive</li> <li>CookieYes</li> <li>Canto</li> </ul>
<b>Support Democratisation of Data:</b> including providing people with easy and efficient access to information with the use of AI. This includes any information which is available Lightsource bp's website such as articles, testimonials and blog posts.	<p>It is necessary for the purposes of Lightsource bp's legitimate interests to support democratisation of data and information.</p> <p>You are able to object to the processing of their personal data when used for AI purposes.</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Opinions and Feedback</li> </ul>	<ul style="list-style-type: none"> <li>Boomi</li> <li>Microsoft</li> <li>OnePoint</li> <li>Snowflake</li> </ul>
<b>Anonymisation of your Data:</b> on occasions, Lightsource bp utilise publicly available sources to support with our business development activities. When these documents contain personal data, which is not required to meet the purpose of project, we will utilise automated tools (including the use of AI) to anonymise your personal data and information.	It is necessary for the purposes of Lightsource bp's legitimate interests.	<ul style="list-style-type: none"> <li>Name</li> <li>Business Contact Details</li> <li>Signatures</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> </ul>
<b>Merger and Acquisition:</b> Lightsource bp may need to process and share information in the event of a sale or potential sale or merger of a relevant part of our business.	It is necessary for the purposes of Lightsource bp's legitimate interests.	<ul style="list-style-type: none"> <li>Name</li> <li>Business Contact Details</li> <li>Signatures</li> <li>Information related to contracts and services we may provide to you</li> </ul>	<ul style="list-style-type: none"> <li>External Auditors and Law Firms (varies per country or jurisdiction)</li> </ul>
<b>Detection and Prevention of Crime:</b> Lightsource bp utilise CCTV and drone footage to monitor the security and construction status of our sites and offices.	It is necessary for the purposes of Lightsource bp's legitimate interests.	<ul style="list-style-type: none"> <li>Video</li> <li>Photographs</li> </ul>	<ul style="list-style-type: none"> <li>Sensehawk</li> </ul>

<p><b>Complying with Regulatory Requests:</b> including from government agencies, regulators and other third parties with legal authority.</p>	<p>It is necessary for compliance with a legal obligation.</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Business Contact Details</li> </ul>	<ul style="list-style-type: none"> <li>Various</li> </ul>
<p><b>Undertake Due Diligence Checks:</b> including with individuals, companies and counterparties including suppliers which we intend to, or do work with. These checks help to ensure that all counterparties we work with can share our values and comply with the law.</p>	<p>It is necessary for compliance with a legal obligation.</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Business Contact Details</li> <li>Job title</li> <li>Organisation</li> <li>Signatures</li> <li>Information related to contracts and services you provide to us.</li> <li>Criminal Record and Sanctions Information</li> <li>Security Clearance</li> </ul>	<ul style="list-style-type: none"> <li>Moody's</li> <li>Dun and Bradstreet</li> <li>RTM (Navigator)</li> <li>Microsoft</li> <li>OneTrust</li> </ul>
<p><b>Photographs and Recordings for promotional or marketing purposes:</b> Lightsource bp take photographs and recording for promotion or marketing purposes. These can then be used in future marketing campaigns, or promotional materials.</p>	<p>It is necessary for the purposes of Lightsource bp's legitimate interests.</p> <p>You are under no obligation to have your photo or video taken and may object to it both being taken and/or used.</p>	<ul style="list-style-type: none"> <li>Photograph</li> <li>Video</li> <li>Audio</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> <li>Various third party Photographers and Marketing Consultancies (varies by country and jurisdiction)</li> </ul>
<p><b>Administer your Data Subject Rights:</b> when you request to access any of your rights under applicable Data Protection and Privacy Legislation.</p>	<p>It is necessary for compliance with a legal obligation.</p>	<ul style="list-style-type: none"> <li>Any personal data and information requested by you and processed by Lightsource bp.</li> </ul>	<ul style="list-style-type: none"> <li>Microsoft</li> </ul>

## How long will we keep your Personal Data and Information?

We will only retain your personal data and information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We review personal data on a case-by-case basis and document the period of retention for each.

If you have any questions or would like more information about the retention of your data, please contact us at:

[privacy@lightsourcebp.com](mailto:privacy@lightsourcebp.com)

## Sharing your Personal Data and Information

We will share your personal data and information with third party providers to enable the business to function and to store information securely.

“Third Parties” includes Third-Party service providers (including contractors and designated agents) and other entities within our Group. We use third party providers for such activities as for legal services, accountancy, administration, and IT services.

All our third party providers and other entities in the Group are required to take appropriate security measures to protect your personal data and information in line with our policies.

## International Data Transfers

As a global organisation, that utilises many industry leading systems, our staff’s personal data is processed within countries such as the UK, USA and Europe.

Where we process your personal data and information in countries which are deemed to not have equivalent protection to the applicable Data Protection and Privacy Legislation in the country in which you reside, we have implemented appropriate measures to ensure an adequate level of protection of your personal data and information at all times. If you have any questions or would like more information about the safeguards, please contact us at [privacy@lightsourcebp.com](mailto:privacy@lightsourcebp.com)

## Security

We have put in place appropriate security measures to prevent your personal data and information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data and information to those employees, agents, contractors and other third parties who have a business need to know and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data and Security incidents or Breaches and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

Third Parties will only process your personal data and information on our instructions, and where they have agreed to treat the information confidentially and to keep it secure.

## Your Rights

Under applicable Data Protection and Privacy Legislation you have a number of rights related to your personal data and information. We may ask you for identification prior to disclosing any data, as we need to ensure we only disclose information to the person entitled to it. You have the right to:

- **Be Informed** about the personal data and information we hold about you and what we use it for. We meet this requirement by regularly reviewing, updating and providing you with access to this Privacy Notice.
- **Access** to your personal data and information (commonly known as a Data Subject Access Request (DSAR)). This enables you to receive a copy of the personal data and information we hold about you and to check that we are lawfully processing it.
- **Rectification** of the personal data and information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. Please keep us informed of any changes during your working relationship with us, and where possible, update your personal data and information via Success Factors.
- **Erasure** of your personal data and information. This enables you to ask us to delete or remove personal data and information, where there is no good reason for us continuing to process it, including where you withdraw consent, if we are using your personal data and information based on your consent. You also have the right to ask us to delete or remove your personal data and information where you have exercised your right to object to Processing.
- **Object to Processing** of your personal data and information where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to Processing on this ground.
- **Restriction** of processing of your personal data and information. This enables you to ask us to suspend the processing of personal data and information about you, for example if you want us to establish its accuracy, or the reason for processing it.
- **Portability** of the personal data and information you provided to us. This allows for you to receive the personal information and data you provided to us or for us to transmit it to another organisation.
- **Withdraw Consent** at any time, when we are processing your personal data or information on the basis of consent.
- **Not to be subject to Automated Decision Making** including profiling, which produces legal effects or similar significant affects concerning you. For the avoidance of doubt, Lightsource bp does not undertake automated decision-making of this kind.
- **Make a complaint** to a Supervisory Authority in the country in which you reside. That said, we would appreciate the opportunity to first address any concerns you may have with you directly.
- **Object to the Sale or Sharing** of Personal Data and Information if you're based in the USA, and subject to certain exemptions.

**Note:** the above rights do not apply in all circumstances, but we will always look to fulfil your request, or provide information on why we cannot fulfil it.

If you have any questions about this Privacy Notice, or how we handle your personal data and information, please contact the Data Protection Officer (DPO) at [privacy@lightsourcebp.com](mailto:privacy@lightsourcebp.com)



## Changes to this Privacy Notice

This Privacy Notice will be updated from time to time to reflect how we process and look after your personal data and information.

When any significant changes are made, we will communicate this to you via the intranet or by other means of communication such as email, so that you are able to review the changes and make an informed decision as to whether you want to exercise any of your rights.

**Last Updated:** 10<sup>th</sup> May 2024