

Privacy Policy

Solerico Limited (referred to herein as **Solerico**, **we**, **our** or **us**) is committed to complying with all applicable privacy and data protection laws including the Personal Data (Privacy) Ordinance (Cap. 486) (**Ordinance**)¹ and the Data Protection Principles listed in Schedule 1 to the Ordinance. This Privacy Policy (**Policy**) describes Solerico's privacy and data protection practices applicable when we collect your Personal Data, use it and disclose it for the purposes set out in the Policy.

Your consent

While supplying your Personal Data is voluntary, by using our website (accessible at: www.solerico.com), contacting us through our website or otherwise, signing up to our regular newsletters, or partnering with us, you consent that we may collect, use and disclose your Personal Data in accordance with the Policy including for Direct Marketing purposes.

You and **your**, when used in the Policy includes any person who has visited our website, contacted us via our website or otherwise, signed up to our regular newsletters, partnered with us or otherwise provided us with their Personal Data.

Collection of Personal Data

We may collect Personal Data from you. The Ordinance defines Personal Data as any data relating directly or indirectly to you, from which it is practicable for your identity to be directly or indirectly ascertained, in a form in which access to or processing of the data is practicable (**Personal Data**).

We may collect Personal Data, by way of example, through our website—using Cookies—when you contact us, sign up to our regular newsletters or when you partner with us. The Personal Data collected from you may include in particular your full name, email address, telephone number, and company name.

Purposes of collecting and using Personal Data

Solerico may collect and use Personal Data for one or more of the following purposes or directly related purposes:

- Registering your contact details in a systematic format when contacting us or partnering with us;
- Communicating with you in response to any enquiries or otherwise;
- Promoting and keeping you informed of Solerico's activities in particular through regular newsletters;
- Communicating with you on fundraising opportunities or other events;
- Direct Marketing including but not limited to soliciting donations or other contributions from you from time to time;
- Dealing with our Service Providers who we may instruct to handle your Personal Data in accordance with this Policy.

¹ The Personal Data (Privacy) Ordinance (Cap. 486) is accessible at: <https://www.elegislation.gov.hk>

Accuracy and retention of Personal Data

Solerico takes all reasonably practical steps to ensure that Personal Data collected from you and retained by us is accurate. We retain Personal Data for as long as it is required for the purposes and uses as described in the Policy.

Security of Personal Data

Solerico is committed to treating Personal Data as confidential. We take all reasonably practicable steps to ensure that Personal Data is protected against unauthorised or accidental access, processing, erasure, loss or use in respect of its collection, use, retention, transfer and access.

We store Personal Data on our secured servers. We limit the use of and access to Personal Data to our designated personnel, and Service Providers who we may instruct to handle your Personal Data in accordance with this Policy.

Solerico may also use and disclose your Personal Data, in particular:

- when required or authorized by or under any enactment, by any rule of law or by an order of a court in Hong Kong, when required in connection with any legal proceedings in Hong Kong, or when required for establishing, exercising or defending legal rights in Hong Kong;
- for preparing statistics or carrying out research; or
- for the purpose of a due diligence exercise to be conducted in connection with a restructuring or transfer of our activities.

Data processing by Service Providers

Solerico may use selected service providers from time to time to fulfil the purposes and uses of Personal Data in accordance with the Policy (**Service Providers**). Service Providers may include third parties (1) registering donations or through which you may make donations such as payment service providers or (2) processing the Personal Data collected from you for example to manage membership or subscriptions to newsletters.

We may transfer Personal Data collected from you (which may include your full name, email address, telephone number, and company name) to Service Providers in a given case. Service Providers may store Personal Data outside of Hong Kong. Solerico uses its best efforts to ensure that the Service Providers comply with the Policy in particular as regards retention, prevention of unauthorised or accidental access, processing, erasure, loss or use of the data transferred to the Service Provider for processing.

Transfer and Use of Information Outside Your Country of Residence and Compliance with the GDPR

If you are located outside of Hong Kong and you choose to use our website or provide Personal Data to us in connection with the purposes and uses described in the Policy or otherwise, your Personal Data may be transferred to, processed and maintained on servers or databases located in Hong Kong. Our Service Providers that process Personal Data for us may be located in Hong Kong or in other countries outside of your country of residence. Your agreement to the Policy represents your consent to these practices. If you do not want Personal Data transferred to or processed or maintained in Hong Kong, you should not use our website.

In line with the EU General Data Protection Regulation (**GDPR**),² if you are located in the European Union (**EU Data Subject**), when using our website, contacting us, signing up to our regular newsletters or partnering with us including but not limited to responding to solicitation for donations, you are—in any event—entitled to the following rights with regard to Personal Data:

- Right of access, to know what Personal Data about you we hold;
- Right to correct any incorrect or incomplete Personal Data about yourself that we hold;
- Right to restrict/suspend our processing of your Personal Data;
- Right to complain to a supervisory authority if you believe your privacy rights are being violated.

Additional rights that may apply to you in certain instances include:

- Right of data portability;
- Right to withdraw consent at any time;
- Right to object to processing;
- Right to object to processing of information for direct marketing purposes;
- Right of erasure of your information from our system (“right to be forgotten”) if certain grounds are met.

EU Data Subjects can exercise the above rights by contacting Solerico’s EU data representative at: paul.grelon@solerico.com

Solerico relies on the legal bases provided for in Article 6 of the GDPR for the purposes of the lawful processing of Personal Data of EU Data Subjects. These may include, depending on the circumstances:

- your consent (in particular, to process Personal Data we obtain from you when you subscribe to our newsletter or fill in our contact form);
- the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract (in particular, when Service Providers register donations or manage membership or subscriptions to our newsletter);
- compliance with a legal obligations applicable to Solerico (in particular, when Solerico is obligated to transmit Personal Data to law enforcement authorities); and
- legitimate interests pursued by Solerico or by a third party where applicable (in particular, if Solerico were to restructure or transfer its activities; or when we use Cookies to improve the performance of our website).

² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), OJ L 119, 4.5.2016 accessible at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>

Availability, access and correction of Personal Data

You have the right to (1) be informed of your Personal Data retained by us, (2) access, and (3) correct such Personal Data, held by Solerico by sending a written request to caitlin.spencer@solerico.com

To request access to or correction of your Personal Data, please use the prescribed form available at: <https://www.pcpd.org.hk>. Solerico reserves the right to charge a reasonable administrative fee following a request for access to Personal Data corresponding to the costs of responding to such request.

Specifically relating to our regular newsletters, you may request to opt-out by clicking on the unsubscribe button at the bottom of any of our newsletters or by sending your request in writing to caitlin.spencer@solerico.com

Direct Marketing

You retain the right to opt-out from further contact on the first occasion that Solerico contacts you for Direct Marketing purposes.

Solerico may use your Personal Data for direct marketing purposes in particular to solicit donations or other contributions from you directly, to finance the projects we support and coordinate in line with Solerico's mission and vision including but not limited to accelerating the world's transition away from fossil fuels to renewable energy, and to helping disadvantaged communities across the world access clean electricity (*Direct Marketing*). We may use your full name, email address, telephone number, and company name for Direct Marketing Purposes.

At any time and free of charge, you can request Solerico to stop using your Personal Data for Direct Marketing purposes by sending your request to caitlin.spencer@solerico.com.

Use of Cookies

We may automatically collect information—which may include Personal Data—from you, when you use our website by placing a small text file on your computer hard drive through our web server (*Cookies*). Using Cookies may in particular enhance the user experience on our website. You can set your web browser to reject Cookies or to notify you when our web server sends a Cookie to you. If you set your browser to limit or remove Cookies, some features of our website may be unavailable or may be unable to function properly.

Policy change

Solerico will post on this page any changes to the Policy. You should check our Policy regularly to ensure that you are aware of the latest version.

Language

The Policy has been prepared in English.

Contact Solerico

If you have any enquiry in relation to the Policy, please contact us at caitlin.spencer@solerico.com