



## WEBSITE PRIVACY POLICY

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*Ebor International Limited trading as Ebor Energy*

Battery Energy Storage | Solar | EV Charging | Energy Management

*Protecting personal and commercial information with care, transparency and appropriate control*

### PUBLIC WEBSITE POLICY

This policy explains how Ebor International Limited, trading as Ebor Energy, collects, uses, shares, retains and protects personal information through the Ebor Energy website and website-linked business enquiries.

## About this document

This public policy applies to visits to the Ebor Energy website, its enquiry forms, website-linked communications and the initial assessment of renewable-energy, sourcing, procurement, supplier, partner and project enquiries. It should be read with any short notice displayed where information is collected and any transaction-specific notice issued if an enquiry develops into a commercial relationship.

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### 1. Who we are

Ebor Energy is the trading name used by Ebor International Limited for renewable-energy sourcing, procurement, supplier coordination and project-support activities, including battery energy storage systems (BESS), solar solutions, EV charging infrastructure and energy-management technologies. Ebor International Limited is incorporated in Hong Kong under Business Registration Number 64960969, with its registered office at Room 912, 9/F, Lippo Sun Plaza, No. 28 Canton Road, Tsim Sha Tsui, Hong Kong.

Ebor Energy is not a separate legal entity. In this policy, “Ebor Energy”, “we”, “our” and “us” mean Ebor International Limited. We do not represent ourselves as the manufacturer of third-party products unless a specific written contract expressly states otherwise.

For personal information collected through the website, Ebor International Limited is normally the controller or data user, subject to the law that applies to the relevant processing. Questions can be sent to [governance@ebor.group](mailto:governance@ebor.group).

### 2. Scope and status

This policy applies to public website pages, enquiry and contact forms, website-linked email, meeting or call requests, project introductions, supplier or partner enquiries, security and server logs, and correspondence arising from a website interaction.

This policy does not replace a transaction-specific privacy notice, contract, non-disclosure agreement, procurement mandate, supplier agreement, employment notice or other document dealing with a more specific processing activity. Where a more specific notice applies, it supplements or, for that processing, takes priority over this policy.

### 3. Applicable privacy framework

Where United Kingdom data-protection law applies, we process personal information in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 as amended, the Data (Use and Access) Act 2025, the Privacy and Electronic Communications Regulations 2003 as amended, and relevant regulatory guidance. The Data (Use and Access) Act 2025 does not replace the UK GDPR or Data Protection Act 2018; it amends parts of that framework.

As a Hong Kong-incorporated entity, we also apply the Personal Data (Privacy) Ordinance (Cap. 486) and its direct-marketing requirements where applicable. Other mandatory local laws may apply to a particular person, transaction, supplier or project.

UK territorial scope and representative: Because Ebor International Limited is incorporated outside the United Kingdom, we assess whether UK GDPR Article 3(2) applies to each UK-facing processing activity and whether Article 27 requires a representative established in the UK. Where a UK representative is legally required, the representative must be formally appointed in writing and its name and contact details published in this notice and at relevant collection points before the relevant processing is undertaken. Appointment of a representative does not reduce Ebor International Limited's own responsibility or liability.

**Mandatory rights** This policy is designed for a UK-facing international business. It does not reduce any mandatory privacy right that applies to an individual under the law of their country or territory.

### 4. Personal information we collect

- Identity and contact information: name, title, organisation, role, business address, email address, telephone number, country or territory and preferred language.
- Business and authority information: organisation represented, job function, authority to act, sector, website, business profile and relevant professional information.
- Project and enquiry information: requested solution, intended use, site or project location, capacity, specifications, technical requirements, budget range, programme, delivery destination and related correspondence.

- Supplier and due-diligence information: corporate identity, ownership and control, factory or supplier information, certificates, quotations, sanctions or restricted-party screening results, product-safety information, origin, quality and compliance records.
- Commercial and transaction information: quotations, project references, purchase and order information, invoices, payment status, contract records and communications where an enquiry progresses.
- Marketing and preference information: newsletter or event choices, consent, objections, unsubscribe records and communication preferences.
- Technical and security information: IP address, browser and device data, operating system, approximate network-derived location, page requests, timestamps, referrer, server logs and approved storage/access technology identifiers.

**Sensitive information** Do not send passports, bank details, health data, criminal-record information or other sensitive information through a general website form unless we specifically request it through an approved secure channel.

## 5. How we obtain information

We obtain information directly from you when you submit a form, email us, request a meeting, provide project or supplier information, or communicate with us. We may also receive business-contact information from colleagues, corporate websites, professional directories, trade events, advisers, suppliers, public registers, sanctions lists, business-intelligence sources and partner introductions.

Where information is obtained from another source, we provide privacy information within the period and in the manner required by applicable law, unless an exemption applies. We seek to use proportionate, relevant and current sources and do not treat public availability as permission for unrestricted use.

Providing information: General website enquiry information is ordinarily provided voluntarily, except for fields clearly marked as required because they are necessary to route, understand, secure or respond to the enquiry. If required information is not supplied, we may be unable to respond to or progress the enquiry. Where information is required by law or by a proposed contract, we will explain the requirement and relevant consequence at the appropriate collection point.

## 6. Purposes and legal grounds

| Purpose                                        | Typical information                                                                  | Principal UK ground / justification                                                                                                                                                                                  |
|------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respond to an enquiry or requested meeting     | Identity, contact, organisation and enquiry details                                  | Steps requested before a contract; legitimate interests; notified purpose                                                                                                                                            |
| Assess project or commercial suitability       | Project, technical, budget, authority and timing information                         | Legitimate interests in evaluating opportunities and preventing wasted or unsuitable activity                                                                                                                        |
| Source and evaluate suppliers or products      | Supplier identity, certifications, technical, quality, safety and origin information | Legitimate interests; legal obligations where applicable; contract-related processing                                                                                                                                |
| Conduct due diligence and protect the business | Corporate ownership, sanctions, fraud, adverse information and verification records  | Legal obligations where applicable; legitimate interests in sanctions, fraud, security, supply-chain integrity and counterparty risk management; establishment, exercise or defence of legal claims where applicable |
| Deliver an agreed service or project support   | Project, specification, communication, order, invoice and payment information        | Contract performance; legal obligations; legitimate interests                                                                                                                                                        |
| Operate and secure the website                 | IP, device, logs, security events and technical identifiers                          | Legitimate interests; legal obligations; consent or PECR exception where applicable                                                                                                                                  |
| Send permitted business marketing              | Contact and preference information                                                   | Consent where required; legitimate interests or relevant PECR rule for permitted B2B communications                                                                                                                  |
| Handle complaints, rights and disputes         | Identity, correspondence, evidence and case records                                  | Legal obligations; legitimate interests; legal claims                                                                                                                                                                |

Where we rely on legitimate interests, we consider the purpose, necessity and impact on individuals and apply safeguards. Where consent is required, it can be withdrawn at any time without affecting earlier lawful processing.

## 7. Website enquiry form collection notice

At the point a form collects personal information, the website should display a short, prominent collection notice linking to this policy. The form should ask only for information necessary to understand and route the enquiry and should not use pre-ticked marketing consent boxes.

**Suggested layered form notice** Personal Information Collection Notice: Ebor International Limited, trading as Ebor Energy, collects the information you submit to respond to and assess your enquiry, protect our systems and, if the enquiry progresses, administer the relevant commercial relationship. Fields marked required are necessary to deal with the enquiry; other fields are voluntary. If required information is not provided, we may be unable to respond or progress the enquiry. Information may be shared, where necessary, with authorised Ebor Group functions, advisers, technology providers, manufacturers, suppliers, project partners and competent authorities. International access may occur subject to applicable safeguards where required. You may request access to or correction of your personal data and exercise applicable privacy rights by contacting [governance@ebor.group](mailto:governance@ebor.group). Marketing is optional and handled separately. See the Website Privacy Policy.

## 8. Supplier, product and project due diligence

Energy sourcing and project coordination can require verification of companies, factories, products, certifications, sanctions exposure, ownership, safety documentation, product origin, warranty support and supply-chain capability. We limit personal information in those checks to what is proportionate to the commercial, legal, safety and integrity risk.

We may retain evidence supporting a supplier or product decision so that we can demonstrate what was checked, what evidence was relied upon and when the assessment was made. We do not guarantee that public or third-party due-diligence information is complete, but we take reasonable steps to assess credibility and material inconsistencies.

## 9. Who receives personal information

- authorised personnel and governance functions within Ebor Group where access is necessary for the enquiry, project, finance, legal, compliance, technology or risk purpose;
- professional advisers, accountants, auditors, insurers, banks and legal advisers where appropriate;
- hosting, email, CRM, document-management, cybersecurity, analytics, communications and other approved technology providers acting under suitable terms;
- manufacturers, suppliers, technical advisers, logistics providers, project counterparties or clients where necessary to progress a legitimate enquiry or project and subject to confidentiality and minimisation controls;
- public authorities, regulators, courts or law-enforcement bodies where disclosure is legally required or necessary to protect legal rights.

We do not sell personal information. We do not disclose personal information to a third party for that party's independent direct marketing unless the required consent or other lawful basis exists.

Where a supplier acts as our processor or processes personal information on our behalf, we use contractual or other legally appropriate controls addressing instructions, confidentiality, security, retention/deletion, sub-processing, assistance with rights and incidents, and international transfers as applicable. Independent recipients remain responsible for their own legal obligations.

## 10. International access and transfers

Because Ebor Energy operates internationally, information may be accessed, processed or stored in the United Kingdom, Hong Kong, mainland China and other countries connected with a client, supplier, manufacturer, technology provider, adviser or logistics relationship.

Where UK restricted-transfer rules apply, we first determine whether the transfer rules apply and then use an applicable adequacy arrangement, an appropriate safeguard such as the current UK International Data Transfer Agreement (IDTA) or UK Addendum, another recognised safeguard, or a permitted exception. Where required, we complete the applicable transfer risk assessment/data protection test and apply supplementary measures proportionate to the risk, such as data minimisation, restricted access, encryption, confidentiality obligations and supplier due diligence.

A person may ask for information about an applicable transfer safeguard by contacting the Privacy Lead. We may redact commercially sensitive or security-sensitive provisions.

## 11. Direct marketing and business communications

We send marketing about Ebor Energy services, projects, events or relevant opportunities only where permitted by applicable law. Under UK PECR, rules differ by communication method and recipient. Electronic mail to corporate subscribers may be treated differently from electronic mail to individual subscribers such as sole traders and certain partnerships, but UK GDPR still applies whenever personal data is used. We identify the applicable rule before each campaign, use consent where required, screen relevant objections/suppression records, and do not treat the publication of a business contact address as unrestricted permission to market.

Every marketing message should identify the sender and provide a working, no-charge method to object or unsubscribe. An objection will be respected promptly. We may retain a minimal suppression record so that the preference continues to be honoured.

Tracking pixels or similar storage/access technologies in marketing emails or digital messages are assessed under the Cookie and Storage/Access Technologies Policy and are not used without the required consent or a valid statutory exception.

**Marketing right** You may object to direct marketing at any time by using the unsubscribe method in a message or by contacting [governance@ebor.group](mailto:governance@ebor.group). Necessary project, contractual, security and legal communications may continue.

## 12. Artificial intelligence and automated tools

Approved AI-assisted or automated tools may support translation, drafting, document classification, research, comparison, workflow management and quality assurance. The legal ground is the same as for the underlying business task; use of a tool is not a separate purpose.

We apply human oversight to material commercial, supplier, technical and compliance decisions. We do not intentionally upload unnecessary identity documents, banking data, confidential technical files, trade secrets or sensitive personal information to public or unapproved AI services. Personal information supplied through the website must not be used to train a provider's general-purpose model unless the information has been effectively anonymised or a separate lawful and transparent arrangement applies.

We do not currently make solely automated decisions about ordinary website users that produce legal or similarly significant effects. If that changes, we will provide the information and safeguards required by law before the processing begins.

Before introducing materially higher-risk profiling, monitoring, large-scale matching, novel AI processing or other processing likely to result in a high risk to individuals, we carry out an appropriate data-protection impact assessment and implement required safeguards before deployment.

## 13. Cookies and storage/access technologies

The website may use cookies, pixels, local storage, scripts, tags, embedded services or similar storage and access technologies. Their use is governed by the Website Cookie and Storage/Access Technologies Policy and the live preference centre.

Non-exempt technologies are not to be activated before the required consent is obtained. Where a statutory exception is relied upon, the conditions for that exception must be met, including any transparency and objection requirements.

## 14. Security and data incidents

We use proportionate technical and organisational controls designed to protect personal and commercially sensitive information against unauthorised or accidental access, alteration, disclosure, loss, destruction or misuse. Controls may include role-based access, multifactor authentication, encryption in transit, approved cloud services, logging, secure configuration, supplier due diligence, confidentiality duties, backups, malware protection, retention controls and incident procedures.

No online system is risk-free. Where a personal-data breach occurs, we assess it promptly, contain it, preserve an appropriate record and make any legally required notifications. Where UK GDPR applies, a notifiable breach is reported to the ICO without undue delay and, where feasible, within 72 hours after becoming aware of it; affected individuals are informed without undue delay where the breach is likely to result in a high risk to their rights and freedoms.

## 15. Retention and deletion

| Record category                                     | Standard retention approach                                                                                                                               |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| General website enquiry that does not progress      | Normally up to 24 months after the last meaningful contact, unless a shorter period is appropriate                                                        |
| Project, quotation or supplier review enquiry       | For the active relationship and normally up to 7 years after completion or last substantive activity where needed for legal, commercial or audit purposes |
| Supplier due diligence and compliance evidence      | Normally up to 7 years after the relevant decision, relationship or last review, subject to risk and legal needs                                          |
| Contracts, orders, invoices and transaction records | Normally 7 years after completion or the relevant accounting period, or longer where law, litigation or contract requires                                 |
| Marketing preferences and suppression records       | Until consent is withdrawn or objection made; minimal suppression information may be retained to respect the choice                                       |
| Website security logs                               | For a proportionate security period based on risk, investigation needs and provider configuration                                                         |
| Cookie/consent records                              | For the period needed to demonstrate and respect the user choice and as set out in the live technology register                                           |

Retention is not automatic. We may keep information for a shorter or longer period where justified by legal obligations, claims, investigations, safety, warranty support, fraud prevention or a documented business need.

## 16. Your privacy rights

Depending on the law that applies, an individual may have rights to receive information about processing, access personal information, correct inaccurate data, request erasure, restrict processing, object, obtain portable data, withdraw consent and challenge certain automated decisions. Some rights are conditional and exemptions may apply.

Requests should be sent to [governance@ebor.group](mailto:governance@ebor.group). We may need proportionate identity verification and enough information to locate the relevant records. We respond within the statutory time limit that applies and may pause or extend a deadline only where the law permits.

## 17. Data-protection complaints

A person may make a data-protection complaint by emailing [governance@ebor.group](mailto:governance@ebor.group) or using any website complaint form provided. We will acknowledge a data-protection complaint within 30 days of receiving it, investigate without undue delay, keep the complainant appropriately informed and communicate the outcome without undue delay, in accordance with the current UK complaint-handling requirements where they apply.

Where UK law applies, a person may also complain to the Information Commissioner's Office. We encourage concerns to be raised with us first so that we have an opportunity to investigate and resolve them, but this does not remove the right to contact a regulator.

## 18. Children

The website is designed primarily for organisations, professionals and adult decision-makers. We do not knowingly seek personal information from children through general business enquiry forms. If a child's information is submitted inadvertently, contact us so that we can assess and, where appropriate, delete or restrict it.

## 19. External websites and embedded services

The website may link to or embed services operated by third parties. Their privacy practices are governed by their own notices. We select and configure third-party services with due care, but we do not control an independent third party's website or processing. Non-essential embedded services should be blocked until consent is obtained where required.

## 20. Changes to this policy

We review this policy at least annually and earlier when the law, website configuration, data flows, international arrangements, suppliers, products or business model materially change. The current publication date and version should always be displayed on the website.

## 21. Contacting Ebor Energy

Privacy questions, rights requests and data-protection complaints should be sent to [governance@ebor.group](mailto:governance@ebor.group). Postal correspondence may be addressed to Ebor International Limited trading as Ebor Energy, Room 912, 9/F, Lippo Sun Plaza, No. 28 Canton Road, Tsim Sha Tsui, Hong Kong.

Commercial enquiries should be submitted through the Ebor Energy website Contact section or through the contact details stated in the relevant commercial correspondence.

## Policy information and document control

The following information forms the formal document-control record for this website document.

| Control                      | Information                                                                                                                                                                                     |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Document title               | Website Privacy Policy                                                                                                                                                                          |
| Legal entity                 | Ebor International Limited                                                                                                                                                                      |
| Trading name                 | Ebor Energy                                                                                                                                                                                     |
| Website                      | The Ebor Energy public website on which this document is published, and any clearly linked Ebor Energy microsite that expressly adopts this document                                            |
| Business Registration Number | 64960969                                                                                                                                                                                        |
| Registered office            | Room 912, 9/F, Lippo Sun Plaza, No. 28 Canton Road, Tsim Sha Tsui, Hong Kong                                                                                                                    |
| Document reference           | EEN-WEB-PRIV-051                                                                                                                                                                                |
| Version                      | 51.0                                                                                                                                                                                            |
| Status                       | Publication edition                                                                                                                                                                             |
| Classification               | Public                                                                                                                                                                                          |
| Policy owner                 | Board of Directors, Ebor International Limited                                                                                                                                                  |
| Operational responsibility   | Privacy Lead                                                                                                                                                                                    |
| Issue / effective date       | 22 July 2026                                                                                                                                                                                    |
| Review date                  | 22 July 2027, or earlier following a material legal, regulatory, technological, product, supplier or operational change                                                                         |
| Contact                      | governance@ebor.group                                                                                                                                                                           |
| Approval authority           | Board of Directors, Ebor International Limited                                                                                                                                                  |
| Document administration      | R. Lui, Group Company Secretary                                                                                                                                                                 |
| Related documents            | Website Cookie and Storage/Access Technologies Policy; Website Terms and Conditions; Website Complaints and Concerns Procedure; form-level collection notices; applicable commercial agreements |

## Revision record

| Version | Date         | Status     | Summary                                                                                                                                                                                                                                                   |
|---------|--------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 50.0    | 22 July 2026 | Superseded | Initial Version 50.0 publication edition superseded following a second legal, regulatory and operational compliance review.                                                                                                                               |
| 51.0    | 22 July 2026 | Current    | Second-review publication edition strengthening UK Article 27 representative governance, Hong Kong PICS/collection notices, lawful-basis wording, processors, international-transfer tests, B2B marketing, email tracking, DPIAs and breach notification. |

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