	<b>Effective Date</b> 17/03/2025	<b>Procedure number:</b> 100-112	
<b>Procedure name:</b> Privacy Policy	<b>Date of update:</b> 17/03/2025	<b>Procedure Type:</b> Department	<b>Written By:</b> Noa Zexer <b>Title:</b> Legal Counsel, ESG

This Privacy Policy (“**Privacy Policy**”) describes what Personal Data (as defined below) Enlight Renewable Energy Ltd., and its affiliated companies (collectively “**Enlight**”, “**we**”, “**our**” or “**us**”) collects, processes, uses, and discloses in connection with our international website’s visitors and users (“**Visitors**”, “**you**” or “**your**”) at: <https://enlightenergy.co.il/>, and any content or services included therein (“**website**”).

This Privacy Policy constitutes an integral part of our website’s [Terms of Use](#) (collectively the “**Terms**”). It provides you with information regarding what Personal Data we collect and for what purposes, our data processing operations, the lawful basis under which we process your Personal Data, third parties to whom Personal Data will be transferred, data retention periods, etc.

This Privacy Policy also describes how you may exercise your rights, where and to the extent applicable under relevant privacy legislation, including the EU and the UK General Data Protection Regulation (“**GDPR**”), and the Israeli Protection of Privacy Law, 5741 – 1981 (all collectively shall be defined as “**Data Protection Laws**”).

**You are not required by law to provide us with any Personal Data. Sharing your Personal Data with us is entirely voluntary. However, without your data, we would not always be able to provide you with all or some of our Services.**

## **1. DATA CONTROLLER AND CONTACT INFORMATION**

Enlight Renewable Energy Ltd., incorporated under the laws of the state of Israel, is the “**Data Controller**” (as such terms are defined under the applicable Data Protection Laws) of the Personal Data detailed under this Privacy Policy. For any question, inquiry, or concern related to this Privacy Policy or the processing of your Personal Data, you may contact our privacy team as follows:

**By E-Mail:** [privacy@enlightenergy.co.il](mailto:privacy@enlightenergy.co.il).


**By Mail:** Enlight Renewable Energy Ltd.

13 Ha'amal St., Afek Industrial Park, Rosh Ha'ayin 4809249, P.O. Box 11659.

### **Data Protection Representative for Data Subjects in the EU and UK:**

**Attn:** Noa Zexer

**Email:** [noaz@enlightenergy.co.il](mailto:noaz@enlightenergy.co.il)

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## 2. POLICY AMENDMENTS

We reserve the right to amend this Privacy Policy occasionally, at our sole discretion. The most recent version of this Privacy Policy will always be posted on the website and the updated date will be reflected in the “Last Amended” heading. We will provide notice to you if these changes are material, and, where required by applicable law, we will obtain your consent. Any amendments to the Privacy Policy will become effective immediately, unless notified otherwise.

## 3. TYPES OF DATA WE PROCESSED, THE PURPOSES OF PROCESSING AND THE LAWFUL BASIS


We collect two types of information, depending on your interaction with us.

The first type of information is non-identifiable and anonymous information (“**Non-Personal Data**”). We are not aware of the identity of the individual or other identifiers of the individual from which the Non-Personal Data is collected. Non-Personal Data which is being gathered via access or interaction with the website, consists of aggregated usage information, as well as technical information transmitted by your device, such as the *type of operating system, browser, internet service provider (ISP), or device settings (e.g. default language), etc.*

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Data**”). Furthermore, we may process “**Special Categories of Personal Data**“, as such term is defined under applicable Data Protection Laws, where provided by the Customer, and as detailed below.

**The following table details the types of personal data processed, the purpose, and the lawful basis:**

TYPE OF DATA	PURPOSES OF PROCESSING	LAWFUL BASIS UNDER THE GDPR
<b><u>ONLINE IDENTIFIERS AND USAGE DATA</u></b>		
When you access our website or otherwise interact with its content, we collect certain online identifiers, such as internet protocol address ( <b>IP</b> ), Cookie ID, and other unique identifiers (“ <b>Online Identifiers</b> ”).  Further, we will collect information related to your use and interaction with our website. Such information may include, <i>for example</i> , the referring URL (that is, the webpage directing you to our website, and other websites you visited in the session), how	We process such Online Identifiers and Usage Data through our or third-party cookies and tracking technologies for analytic, marketing, and advertising purposes. <i>For example</i> , to measure the effectiveness of our content and advertising campaigns to improve our marketing efforts as well as to serve cross-websites ads to Visitors.  In addition, Usage Data related to our website helps us to better understand our	Where we process Online Identifiers or Usage Data for operation and security purposes, we process your data based on our legitimate interest.  Where we process Online Identifies or Usage Data for analytic and advertising purposes, we process such data based on your consent which we will obtain through our cookie notice and consent management tool (“ <b>CMP</b> ”).

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you interact with our webpages and content, access time and date, duration of use, pages you have viewed on our website, clickstream, etc. (“ <b>Usage Data</b> ”).	business, analyze our operations, maintain, improve, design, and develop our website, conduct statistical analysis, etc.  Further, we process such data for our website operation and functionality, security and fraud prevention purposes, debugging purposes and to resolve technical problems.	You may withdraw consent at any time by using the cookie settings tool made available on our website or by managing opt-out through your browser or device settings.  You may also contact us at: <a href="mailto:privacy@enlightenergy.co.il">privacy@enlightenergy.co.il</a> .
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#### **LOCATION**

Based on the IP address or other information we may obtain such as zip code, we can approximately know your location.	We process such data for language preference and contextual advertisement ads based on your general location.	We process such data based on our legitimate interest.
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#### **RECRUITMENT INFORMATION**

When you apply for a job, we will collect your CVs as you provided, including all the information included within, and any additional information you provide.	We will process such data in accordance with the <a href="#">Privacy Notice For Job Candidates</a> .	We process such data for the purposes described in our <a href="#">Privacy Notice For Job Candidates</a> . Please read the detailed lawful basis for such processing in the Privacy Notice abovementioned.
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#### **CONTACT DATA**

Where you contact us with any inquiries, either through any means of communications we make available (e.g., the online webpage available <a href="#">HERE</a> , by email, or by phone call), you will be requested to provide us with your contact information such as your full name, email address, phone number, the subject of the inquiry, and any other information you choose to share with us through your correspondence or other communications with us (“ <b>Contact Data</b> ”).	We process such Contact Data to respond to your inquiry and provide you with the support or information you have requested.  Our correspondence with you and its content may be further processed and stored by us to:  (1) improve our customer service; and (2) in the event we reasonably determine it is needed to comply with any regulatory requirements, or for handling and defending against any future claims or disputes you might have with us.	We process such Contact Data subject to our legitimate interest.  After addressing your inquiry, we may retain your data in our systems as part of our business records keeping subject to our legitimate interest .  If we deem it necessary, following a legal obligation or to defend our claims, we may store such correspondence for a longer period.
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#### **NEWSLETTER SUBSCRIPTION**

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If you subscribe to receive our newsletter, updates, and other marketing materials, you will be requested to provide us with your email address.	<p>We process such data to send you the content you have signed up to receive.</p> <p>We will further store such data to include you and maintain, our marketing and mailing lists, as well as the "opt-out" list (solely the necessary information for such purpose), to ensure we respect your choice and comply with applicable laws in this regard.</p>	<p>We process such data based on your consent.</p> <p>You may withdraw your consent at any time by using the "<b>unsubscribe</b>" link within the emails you will receive from us.</p> <p>In addition, we will further maintain a suppression file – meaning lists of applicable emails that have requested to opt-out, under our legitimate interest and to ensure we comply with such preference and choice.</p> <p>Please note that if you choose to unsubscribe from our direct marketing, we will still send you service-related emails, such as invoices.</p>
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Please be aware that the specific processing activities for each purpose of use and lawful basis listed in the table above may vary. Typically, these activities include automated operations such as collection, storage, usage, transmission, deletion, or destruction. Any transfer of Personal Data to countries outside our jurisdiction, as further described in the *Cross Border Data Transfer* section below, relies on the same lawful basis indicated in the table.

Additionally, we may process certain Personal Data to prevent potentially unlawful activities, fraud, misappropriation, intellectual property infringements, identity theft, and other misuse of our website. This also includes enforcing our terms of use and other policies, ensuring the security and integrity of our databases and the website, and mitigating legal risks. This type of processing is conducted based on our legitimate interests.

#### 4. **HOW DO WE COLLECT PERSONAL DATA**

Depending on the nature of your interaction with us, we may collect Personal Data as follows:

- (1) *Automatically* – we may use cookies (as elaborated below) or similar tracking technologies to gather some information automatically when you interact with our website.
- (2) *Provided by you voluntarily* – we will collect Personal Data if and when you choose to provide us with the information, such as when you contact us, etc.

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### **COOKIES AND TRACKING TECHNOLOGIES**

We use “cookies” (or similar tracking technologies) when you access, interact with, or use our website and Services. The use of cookies is a standard industry-wide practice. A “cookie” is a small piece of information that a website assigns and stores on your computer while viewing a website. Cookies can be used for various purposes, including allowing you to navigate between pages efficiently, enabling automatic activation of certain features (e.g., shopping cart), for statistical purposes, and advertising purposes.



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**Title:** Legal Counsel, ESG

COOKIE, PIXEL, SDK	THE PURPOSE OF PROCESSING	PRIVACY POLICY & OPT-OUT OPTIONS
<b>Google reCAPTCHA</b>	This cookie is designed to ensure the proper functioning and security of the website and its operations. The cookie is for fraud detection, protects against malware, and examines the traffic on the website.	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
<b>Google Analytics</b>	This cookie is designed for analysis, data analysis, measurement, performance improvement, and user experience on the website.	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a> Opt-out option: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> For more information on other Google products, please see <a href="#">Here</a> .
<b>Google DoubleClick</b>	This cookie is designed to target users and display targeted advertising relevant to the users. It is designed to serve targeted advertisements and sponsored marketing that is based on user behavior and based on user's browsing history. This cookie measures the conversion rate of advertisements shown to the user.	
<b>Google YouTube Pixel</b>	This pixel is used for the functionality of the pixel on the website – directing the users to the URL of Enlight's page on the YouTube platform.  In addition, the pixel is intended to measure and collect statistics on the amount of traffic and for data analysis purposes.	
(1) <b>Facebook Analytics [Meta Platforms]</b> (2) <b>Meta Pixel</b> (3) <b>Instagram Pixel</b>	(1) This cookie is designed to measure the use of various services on the website and to enhance user experience;  (2) Those pixels are used for the functionality of the pixels on the website – directing the users to the URL of Enlight's page on Facebook & Instagram platforms.  (3) In addition, the pixel is intended for measuring and collecting statistics on the amount of traffic and for data analysis purposes.	<a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>  Opt-out option: <a href="https://www.facebook.com/privacy/policies/cookies">https://www.facebook.com/privacy/policies/cookies</a>
(1) <b>LinkedIn Cookie</b> (2) <b>LinkedIn Pixel</b>	(1) This cookie is designed to measure the use of various services on the website and to enhance user experience;  (2) This pixel is used for the functionality of the pixel on the website – directing the users to the URL of Enlight's page on the LinkedIn platform.  (3) In addition, the pixel is intended for measuring and collecting statistics on the amount of traffic and for data analysis purposes.	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>  Opt-out option: <a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>

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<b>Telegram Pixel</b>	This pixel is used for the functionality of the pixel on the website – directing the users to the URL of Enlight's page on the Telegram platform.	<a href="https://telegram.org/privacy">https://telegram.org/privacy</a>
<b>Twitter [X] Pixel</b>	This pixel is used for the functionality of the pixel on the website – directing the users to the URL of Enlight's page on the X platform.	
<b>Outbrain</b>	This cookie is designed to target users and display targeted advertising relevant to the users. It is designed to serve targeted advertisements and sponsored marketing that is based on user behavior and based on user's browsing history. This cookie measures the conversion rate of advertisements shown to the user.	<a href="https://www.outbrain.com/privacy/wp-content/uploads/2023/11/Outbrain-Privacy-Policy_EU-US_Oct_30_2023.pdf">https://www.outbrain.com/privacy/wp-content/uploads/2023/11/Outbrain-Privacy-Policy_EU-US_Oct_30_2023.pdf</a>
<b>Piwik</b>	This cookie is designed for analysis, measurement, performance improvement, and user experience on the website.	<a href="https://piwik.pro/privacy-policy">https://piwik.pro/privacy-policy</a>
<b>AWS</b> <b>api.stockdio</b>	This cookie is used for website functionality, operations, and traffic routing.	<a href="https://aws.amazon.com/privacy">https://aws.amazon.com/privacy</a>

## 5. **YOUR RIGHTS RELATED TO YOUR PERSONAL DATA**

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We allow you to exercise certain choices, rights, and controls in connection with your Personal Data. Depending on your relationship with us, your jurisdiction and the applicable data protection and privacy laws that apply to you, you have the control and request certain limitations or rights to be executed.


For detailed information on your rights and how to exercise your rights, please see the Data Subject Request Form (“DSR”) available [HERE](#) and send it to our privacy team at: [privacy@enlightenergy.co.il](mailto:privacy@enlightenergy.co.il).

**Certain rights can be executed independently by you without the need to fill out the DSR Form:**

- You can opt-out from receiving our marketing emails by clicking the “unsubscribe” link;
- You can withdraw consent for processing Personal Data for analytics or marketing purposes, by using the cookie setting on the website.

You may opt-out directly from third-party retargeting cookies or other ad-technology trackers through self-regulatory services. For more information, please visit:

**Use the Global Privacy Control (“GPC”) signals.**

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You can also opt out of interest-based advertising with some of the service providers we use, such as Google [HERE](#), Google Analytics [HERE](#), and Google Ads [HERE](#).

## 6. **DATA SECURITY AND PROTECTION**

We design our systems while prioritizing the security of your Personal Data and privacy. We follow the Privacy-By-Design and Privacy-By-Default approaches. Thus, Enlight has implemented physical, technical, and administrative security measures that comply with applicable laws and industry standards, such as encryption, access restrictions, and designated permissions to employees, contractors, agents, etc.

Know that we cannot be held responsible for unauthorized or unintended access beyond our control, and we make no warranty, express, implied, or otherwise, that we will always be able to prevent such access. If you feel that your privacy matter or issue was not dealt with proper attention or care, please contact us at: [privacy@enlightenergy.co.il](mailto:privacy@enlightenergy.co.il).

## 7. **DATA RETENTION CLAUSE**

We retain Personal Data we collect for as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until an individual expresses a preference to opt-out, where applicable.

Other circumstances in which we will retain your Personal Data for longer periods of time include:


- (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements;
- (ii) for us to have an accurate record of your correspondence or interaction with us in the event of any complaints or disputes; or
- (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data.

Note that except as required by applicable law, we will not be obligated to retain your Personal Data for any period, and we may delete it for any reason and at any time, without providing you with prior notice.


## 8. **SHARING PERSONAL DATA WITH THIRD PARTIES**

We share your Personal Data with third parties, including our partners or service providers that help us provide, operate, and manage our website, business operations, marketing operations, and services. You can find in the table below information about the categories of such third-party recipients.



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- (1) The Enlight Company Group. All types of Personal Data are shared. We may share Personal Data with other affiliates or subsidiaries within the Enlight company group, where applicable and where we believe, for example, when your inquiry applies to a specific subsidiary of Enlight or where required to meet our legal and regulatory obligations.
- (2) Vendors, Service Providers, and Contractors. All types of Personal Data are shared. We employ other companies and individuals to perform functions on our behalf. This might include sending communications, processing payments, analyzing data, providing marketing and sales assistance (including advertising and event management), identifying errors and crashes, conducting customer relationship management, delivery, shipments, etc. These third-party service providers have access to Personal Data needed to perform their functions, but they are prohibited from using your Personal Data for any purposes other than providing us with requested services. Note that we prioritize your privacy and ensure such service providers only have access to the Personal Data which is strictly necessary for fulfilling the purpose above mentioned (*e.g.* operating and providing the website, processing payments, etc.). Further, they are required to secure the Personal Data they receive and use it for the specific purposes pre-instructed by us.
- (3) Enforcement of our Rights and Security Detections. All types of Personal Data are shared. We may disclose Personal Data to enforce our policies and agreements, as well as defend our rights, including the investigation of potential violations thereof, alleged illegal activity, or any other activity that may expose us, you, or other users to legal liability, and solely to the extent required. In addition, we may disclose Personal Data to detect, prevent, or otherwise address fraud, security, or technical issues, solely to the extent required.
- (4) Governmental Agencies, or Legal Authorized Third Parties Subject to law enforcement authority request. We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to terror acts, criminal investigations alleged illegal activity, or any other activity that may expose us, you, or any other user to legal liability, and solely to the extent necessary to comply with such purpose.
- (5) Acquisition and Merge. All types of Personal Data are shared. We may share Personal Data, in the event of a corporate transaction (*e.g.*, sale of a substantial part of our business, merger, consolidation, or asset sale). If such corporate transactions occur, our affiliated companies or acquiring companies will assume the rights and obligations as described in this Privacy Policy.

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## 9. INTERNATIONAL DATA TRANSFERS

As Enlight is a global business operation, we may store or process your Personal Data in several territories, including, *for example*, Israel, the EU, the US, or other countries.

Our data servers in which we host and store the information are in Israel. Enlight's HQ are based in Israel in which we may access the information stored on such servers or other systems such as Enlight's ERP, CRM, and other systems. Thus, any Personal Data you provide us may be transferred to and processed in countries other than the country from which you accessed our website.

We will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer. Where Personal Data collected within the European Economic Area ("EEA") is transferred outside of the EEA to a country that has not received an adequacy decision from the European Commission, we will ensure that there are sufficient safeguards during the transferring of such Personal Data, in accordance with the provision of the standard contractual clauses approved by the European Union.

## 10. PROTECTING CHILDREN

Our website is not intended for use by children ("child" shall mean any individual under the age defined by the applicable law, with respect to the EEA is under 16) and we do not knowingly process children's information. We will discard any information that we receive from a user who is considered a child immediately upon our discovery that such a user shared information with us.

Please contact us at: [privacy@enlightenergy.co.il](mailto:privacy@enlightenergy.co.il) if you have reason to believe that a child has shared any information with us.

## 11. Signatures of approvers:

Approved by Lisa Haimovitz, VP General Counsel, on 03/06/2025

Approved by Ayelet Israeli Cohen, VP Operation, on 03/06/2025