

GE Vernova's Commitment to the Protection of Personal Information (Binding Corporate Rules)

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GE Vernova's Commitment to the Protection of Personal Information (Binding Corporate Rules)

GE Vernova respects the privacy rights of individuals and is committed to handling Personal Information responsibly and in accordance with the principles set forth in the present Commitment, being the group's **Binding Corporate Rules for controller**, and in accordance with its contractual commitments under agreements and with EEA Privacy Laws.

I. Introduction

a. Objective

The aim of this Commitment is to provide adequate and consistent safeguards for the handling of Personal Information by GE Vernova Entities. The Commitment is designed to protect the Personal Information of individuals within the scope of the Commitment regardless of geography or technology. This Commitment has binding legal effect on all GE Vernova entities and their employees, who have the right to access the Commitment which is communicated widely to GE Vernova employees and leadership. GE Vernova undertakes to make the Commitment easily accessible to individuals. In addition to be widely communicated to GE Vernova employees and leadership, the Commitment is publicly available in multiple languages on GE Vernova websites. GE Vernova formally undertakes that all GE Vernova Entities as defined below are bound by this Commitment through a unilateral declaration at the group level. The general business principles of the GE Vernova group are in addition backed by appropriate policies, audits and sanctions, and the Commitment is supplemented by The Spirit and The Letter Policy.

b. Scope

This Commitment establishes the minimum requirements that apply to the Processing of Personal Information by or on behalf of GE Vernova and is designed to protect such Personal Information regardless of geography or technology, when used within GE Vernova. The Commitment applies to Processing of GE Vernova Personal Information, including all Cross-

Border Transfers and Onward Transfers to Data Importers. More details about the scope of GE Vernova's Commitment can be found in the Section "Definitions" hereafter and in the Data Transfers Appendix available [here](#).

c. Definitions

- **Applicable Privacy Law** means any law or regulation relating to the collection, use or other processing of Personal Information, which in respect of EEA Personal Information should always benefit from the same level of protection as provided in EEA Privacy Laws, such that when a GE Vernova Entity Processing Personal information is located outside the EEA, the EEA Privacy Laws of the Data Exporter shall also apply to such Processing.
- **Commitment** means the GE Vernova group's Binding Corporate Rules as controller ("BCR-C") legally binding to the GE Vernova Entities members of the Commitment and framing the transfers of Personal Information within the group when acting as controller.
- **Competent Supervisory Authority** means the EEA supervisory authority competent for the Data Exporter.
- **Cross-border Transfers** means any disclosure by transmission or otherwise by a EEA Data Exporter that makes Personal Information subject to this Commitment available to a non-EEA Data Importer or a non-EEA third-party, including any Onward Transfers.
- **EEA Lead Data Protection Authority** means the supervisory authority of the main EEA establishment of GE Vernova.
- **EEA Liable GE Vernova's Entity** means GE Vernova International LLC French Branch.
- **EEA Personal Information** means any Personal Information to which EEA Privacy Laws apply, or which was collected or otherwise processed in circumstances where EEA Privacy Laws applied at the time of such collection or other processing.
- **EEA Privacy Laws** means the EU General Data Protection Regulation (2016/679), the EU Privacy and Electronic Communications Directive 2002/58/EC as implemented in each EU Member State, all local laws in EU Member States and in the European Economic Area (EEA) relating to the processing of Personal Information and, in respect of each of the foregoing, any amending or replacement legislation from time to time.
- **GE Vernova** is GE Vernova International LLC.
- **GE Vernova Entities** means any of GE Vernova Inc. and its wholly or majority-owned subsidiaries in their roles as receiving entities or transferring entities of GE Vernova Personal Information within GE Vernova.

- **GE Vernova Personal Information** is defined as any Personal Information that is obtained in the context of an individual's relationship with GE Vernova and which GE Vernova processes for its own purposes. Such Personal Information may include, for example, employment data obtained in the context of an employment relationship with GE Vernova, customer data obtained in the context of a customer relationship with GE Vernova and supplier data obtained from GE Vernova's suppliers.
- **Onward Transfers** means subsequent Cross-Border Transfers outside the EEA of Personal Information from a non-EEA GE Vernova Entity to another non-EEA GE Vernova Entity or to a non-EEA third-Party with whom the non-EEA GE Vernova Entity has an agreement.
- **Personal Information** is defined as any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing** refers to any action or set of actions that is performed on Personal Information, whether in whole or part by automated means, such as collecting, recording, organizing, storing, modifying, using, disclosing or deleting such information and "*process(es)*" shall be interpreted accordingly.
- **Data Importer** means a GE Vernova entity bound by this Commitment located in a country outside the EEA that is importing, directly or indirectly, Personal Information from the Data Exporter.
- **S&L Policy** is defined as GE Vernova's Code of Conduct and The Spirit & The Letter, including the Cyber Security & Privacy Policy, which are binding upon all GE Vernova personnel.
- **Data Exporter** means a GE Vernova entity located within the EEA that is exporting, directly or indirectly, Personal Information in the context of Cross-border Transfers.

GE Vernova may publish standards ("Standards") applicable to specific categories of Personal Information and/or types of Processing, such as the *GE Vernova Employment Data Protection Standards*. These Standards supplement the Commitment, provide at least the level of protection for Personal Information described in the Commitment, provide more detailed information about the Processing of Personal Information, and may provide specific examples of types of Personal Information. In case of a conflict of terms between the Commitment and the Standards, the provisions of the Commitment prevail over those of the Standards.

GE Vernova recognizes that certain laws may impose additional requirements than those described in this Commitment. GE Vernova handles Personal Information in accordance with the Commitment unless in conflict with local law, in which case, when in doubt over the action to take in the event of a conflict arising, GE Vernova may consult with the Competent Supervisory Authority.

The Commitment facilitates cross-border flows of Personal Information within GE Vernova.

II. Processing of Personal Information

GE Vernova complies with the following principles when Processing Personal Information.

a. Fairness and Lawfulness: Processing should be fair and lawful

GE Vernova processes Personal Information fairly and lawfully.

In particular, GE Vernova:

- respects Applicable Privacy Law and the rights and freedoms of individuals;
- follows GE Vernova's S&L Policy, which sets GE Vernova's policy requirements for the treatment of Personal Information, except if it conflicts with the provisions of the Commitment.

GE Vernova processes Personal Information relying on an appropriate legal basis applicable under EEA Privacy Laws, including, where applicable:

- where GE Vernova has a legitimate interest which justifies the Processing, except to the extent that GE Vernova's legitimate interests are overridden by the legitimate interests, rights and freedoms of the individual;
- where the Processing is necessary for the performance of a contract to which the individual is a party or in order to take steps at the request of the individual prior to entering into a contract;
- where the Processing is necessary for complying with an obligation imposed on GE Vernova as controller by applicable law, regulation, or governmental authority;
- where there are exceptional situations that threaten the vital interests (life, health or security) of the individual or of another person; or
- in accordance with EEA Privacy Laws, after obtaining the individual's freely given, specific, informed and unambiguous consent.

b. Purpose: Purposes for Processing should be specific and legitimate

GE Vernova limits the Processing of Personal Information to the fulfillment of GE Vernova's specific, explicit and legitimate purposes, as described in this Commitment. GE Vernova only carries out Processing that is compatible with such purposes or with the specified purposes for which the Personal Information was collected, unless GE Vernova has the unambiguous consent of the individual. To determine whether Processing is compatible with the purposes, GE Vernova shall take into account, inter alia:

- any link between the purposes for which the Personal Information have been collected and the purposes of the intended further Processing;
- the context in which the Personal Information have been collected, in particular regarding the relationship between data subjects and the controller;
- the nature of the Personal Information collected, in particular whether special categories of Personal Information are processed;
- the possible consequences of the intended further Processing for individuals; and
- the existence of appropriate safeguards, which may include encryption or pseudonymization of Personal Information.

Without prejudice to the foregoing, when an individual provides GE Vernova with GE Vernova Personal Information of one of their contacts, GE Vernova processes that Personal Information only for the purposes for which it was collected, unless GE Vernova has the contact's unambiguous consent.

c. Proportionality: Information should be adequate and relevant

GE Vernova limits the Processing of GE Vernova Personal Information to that which is adequate, relevant and necessary in relation to the purposes for which GE Vernova collects and uses it.

d. Information Quality: Information should be accurate and current

GE Vernova takes reasonable steps to keep GE Vernova Personal Information accurate and up to date. GE Vernova keeps GE Vernova Personal Information only for as long as is necessary for the purposes for which it is collected and used and delete or render it anonymous after such retention requirements have been met.

e. Transparency: Privacy practices should be clear

GE Vernova adopts and publishes privacy guidelines and standards that govern the Processing of Personal Information in particular contexts. Such guidelines and standards are based upon this Commitment.

As detailed under Section VI.A. Individual Rights – Information of the Commitment, GE Vernova provides transparent information to individuals in a concise, transparent, intelligible and easily accessible form at the point of collection or, within thirty days where the Personal Information is not obtained from the relevant individuals, or at the time of the first communication to the individuals if the Personal Information are to be used for communication with these individuals, or when the Personal Information are first disclosed if a disclosure to another recipient is envisaged, including the modalities for the individuals to exercise their rights under EEA Privacy Laws.

Where GE Vernova collects GE Vernova Personal Information through the Internet or by other electronic means, GE Vernova posts an easily accessible privacy notice that meets these transparency requirements. This privacy notice includes a reminder of the individual's privacy rights where required by EEA Privacy Laws.

f. Security: Appropriate security measures should be applied

GE Vernova aims to protect Personal Information against unauthorized or unlawful Processing and against accidental lost, destruction or damage, using appropriate technical or organization measures through the application of appropriate technical and organizational measures designed to achieve its integrity, confidentiality, security and availability.

g. Sensitive Personal Information: The application of specific measures to sensitive Personal Information Processing

To the extent a GE Vernova Entity processes GE Vernova Personal Information which is sensitive information (such as information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life or sexual orientation) or, where the applicable law of the EU Member State requires it, information relating to criminal convictions and offences, the GE Vernova Entity inform the individual of such collection and Processing in compliance with EEA Privacy Laws.

GE Vernova shall not process information relating to convictions and offences without providing appropriate safeguards for the rights and freedoms of individuals.

GE Vernova shall not process GE Vernova Personal Information which is sensitive Personal Information unless it can rely on applicable exemptions in accordance with EEA Privacy Laws:

- the individual's explicit consent to the Processing and particularly to the Cross-border Transfer of such Personal Information is obtained at the point of collection, except where prohibited by EEA Privacy Laws;
- the Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of GE Vernova or of the individual in the field of employment and social security and social protection law in accordance with EEA Privacy Laws or a EEA collective agreement providing for appropriate safeguards under EEA Privacy Laws;
- the Processing is necessary to protect the vital interests of the individual or of another natural person where the individual is physically or legally incapable of giving consent;
- the Processing relates to Personal Information which are manifestly made public by the individuals;
- the Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- the Processing is necessary for reasons of substantial public interest, in accordance with EEA Privacy Laws which are proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the individual;
- the Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services in accordance with EEA Privacy Laws;
- the Processing is necessary for reasons of public interest in accordance with EEA Privacy Laws providing for appropriate safeguards in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices; or
- the Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

GE Vernova provides appropriate security and protection measures (e.g. physical security devices, encryption, and access restrictions) depending on the nature of these categories of sensitive Personal Information and the risks associated with the intended uses.

h. Restrictions on Onward Transfers

In compliance with standards detailed under Section III.B., Personal Information subject to Cross-border Transfers under the Commitment may only be subject to Onward Transfers outside the EEA to GE Vernova Entities outside the EEA which are not bound by the Commitment and to third-parties which are not bound by the Commitment, if the conditions defined hereafter are complied with. In the absence of an adequacy decision for the countries to which the Personal Information is transferred or appropriate safeguards like the Standard Contractual Clauses of the European Commission, Binding Corporate Rules, certifications or codes of conduct, the Onward Transfers may exceptionally take place only if one of the following derogations applies, in accordance with the EEA Privacy Laws:

- the individual has expressly consented to the Onward Transfer, after having been informed of the possible risks of such Transfers for the individual due to the absence of an adequacy decision and appropriate safeguards;
- the Onward Transfer is necessary for the performance of a contract between the individual and GE Vernova or the implementation of pre-contractual measures taken at the individual's request;
- the Onward Transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between GE Vernova and another natural or legal person;
- the Onward Transfer is necessary for important reasons of public interest;
- the Onward Transfer is necessary for the establishment, exercise or defence of legal claims;
- the Onward Transfer is necessary in order to protect the vital interests of the individuals or of other individuals, where the individual is physically or legally incapable of giving consent;
- the Onward Transfer is made from a register which according to EEA Privacy Laws is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by EEA Privacy Laws for consultation are fulfilled in the particular case.

III. The Commitment in Operation

a. Working with Suppliers

In the ordinary course of operations, GE Vernova may provide Personal Information to selected suppliers or service providers hired to perform certain Processing or other services on its behalf.

GE Vernova's policies require new suppliers or sub-processors engagements to process Personal Information in a manner consistent with this Commitment and Applicable Privacy Law by means of a legal relationship established through a contract or other legally binding and permissible means. All such contracts with internal and external suppliers, must comply with and include all provisions of Article 28(3) of the EU General Data Protection Regulation (2016/679).

Provisions of Article 28(3) of the EU General Data Protection Regulation (2016/679) includes for suppliers to:

- process Personal Information only in accordance with the instructions of the GE Vernova entity acting as controller, including with regard to Cross-border Transfers of Personal Information to a third country or an international organisation, unless required to do so by EEA Privacy Laws. In such a case, the supplier shall inform the concerned GE Vernova entity of that legal requirement before Processing, unless that law prohibits such information on important grounds of public interest;
- commit to impose confidentiality obligations to their personnels authorised to process the Personal Information or that they are under an appropriate statutory obligation of confidentiality;
- implement adequate security measures;

- impose equivalent measures in contracts with subsequent subcontractors, only rely on subcontractors that offer sufficient guarantees of compliance with the EEA Privacy Laws, and only engage subsequent subcontractors with prior specific or general written authorisation of the GE Vernova entity acting as controller. In the case of general written authorisation, the suppliers shall inform the GE Vernova entity acting as controller of any intended changes concerning the addition or replacement of subcontractors, thereby giving the GE Vernova entity acting as controller the opportunity to object to such changes;
- assist the GE Vernova entity acting as controller to answer to data subjects' requests to exercise their rights under the EEA Privacy Laws;
- assist the GE Vernova entity acting as controller to prepare risks and impact assessments, where required;
- assist the GE Vernova entity acting as controller in case of privacy incident by providing it with the necessary information to perform the notification to the competent authority, where required, and inform the data subjects, where required;
- delete or return all Personal Information, including existing copies, to the GE Vernova entity acting as controller, at its choice, at the end of the provisions of services;
- make available to the GE Vernova entity acting as controller all information necessary to demonstrate compliance with the EEA Privacy laws and allow for and contribute to audits, including inspections, conducted by the GE Vernova entity acting as controller or an auditor mandated by this entity.

b. Cross-Border Transfers

In compliance with standards detailed under Section II.H., GE Vernova is entitled to carry out Cross-border Transfers of Personal Information within GE Vernova entities, based upon Data Importers' adherence to this Commitment. No Cross-border Transfer is made to a new GE Vernova entity until it is effectively bound by this Commitment and can deliver compliance.

Additionally, GE Vernova is entitled to carry out Cross-border Transfers outside the GE Vernova Group when one of the following criteria is satisfied:

- the recipient affords the minimum level of protection provided for in this Commitment. Such protection may, for example, result from appropriate contractual clauses or other mandatory privacy rules;
- where the Cross-border Transfer is necessary and in the interest of the individual in the context of a contractual relationship, to protect the vital interests of the individual or of another person, or when legally required on public-interest grounds; or
- the country to which such information is transmitted affords, as a minimum as concerns EEA Personal Information, the level of protection provided by adequacy decisions of the European Commission.

i. National laws and practices

As part of GE Vernova's commitment to accountability, GE Vernova is ready to demonstrate that a Cross-border Transfer complies with the protections provided for in this Commitment, in particular where so required by a Competent Supervisory Authority.

GE Vernova only undertakes Cross-border Transfers where it has assessed that the law and practices in the third country of destination applicable to the Processing of the Personal Information by the Data Importer, including any requirements to disclose Personal Information or measures authorising access by public authorities, do not prevent it from fulfilling its obligations under this Commitment. This assessment is based on the understanding that these laws and practices that respect the essence of the fundamental rights and freedoms do not exceed what is necessary and proportionate in a democratic society and are not in contradiction with this Commitment.

GE Vernova's privacy program establishes GE Vernova's accountability for all necessary Cross-border Transfers by requiring the completion and documentation, within applicable records of processing, of Privacy Impact Assessments and Transfer Impact Assessments as appropriate to the risk associated with any such Cross-border Transfer, in keeping with GE Vernova's Privacy by Design and Privacy by Default approach, and by updating these assessments on a regular basis.

For the assessment of laws and practices of the third country which may affect this Commitment, GE Vernova takes into due account the following elements:

- the specific circumstances of Cross-border Transfers and Onward Transfers within the same third country or to another third country (including purposes of the Cross-border Transfers and Processing, GE Vernova entities and any recipient involved in the Processing and Cross-border Transfers, economic sector, categories and format of the Personal Information transferred, location of the Processing, including storage, and transmission channels used);
- the national laws and practices of the third country of destination relevant in light of the circumstances of the Cross-border Transfer (including in terms of disclosure of Personal Information to public authorities or authorizing access by such authorities and those providing for access to the Personal Information during the transit between the country of the Data Exporter and the Data Importer) and applicable limitations and safeguards; and
- relevant contractual, technical and organizational safeguards put in place to supplement the safeguards under the Commitment, including measures applied during the transmission and to the Processing of the Personal Information in the country of destination.

GE Vernova further provides the competent data protection authorities with access to these assessments upon request. Should GE Vernova identify any residual risk associated with a Cross-border Transfer that is not addressed within the GE Vernova privacy program and its safeguards, including change in the laws in the third-country, GE Vernova informs and involves the Chief Privacy Officer or GE Vernova's Global Director, Privacy Program and Compliance,

promptly identifies appropriate supplementary measures as additional safeguards, applies and appropriately documents these safeguards, and informs and involves GE Vernova Group members of such risks and supplementary measures.

In the event a GE Vernova entity member, acting as a Data Importer when using this Commitment as a tool for Cross-border Transfers, and for the duration of the Commitment membership, has reasons to believe that it is or has become subject to national laws or practices of the third country of destination that would prevent it from fulfilling its obligations under the Commitment, including following a change in the laws in the third country or a measure (such as a disclosure request), it promptly notifies the Data Exporter and GE Vernova Chief Privacy Officer. This information is also provided to the involved GE Vernova Group members.

Upon verification of such notification, the Data Exporter commits to, along with the involved GE Vernova Group members and the Chief Privacy Officer or GE Vernova's Global Director, Privacy Program and Compliance, promptly identify supplementary measures (e.g., technical or organisational measures for security and confidentiality) to be adopted by the Data Exporters and Data Importers to fulfil their obligations under the Commitment.

The same applies if a Data Exporter has reasons to believe that a Data Importer can no longer fulfil its obligations under this Commitment.

In the event a Data Exporter, along with the involved GE Vernova Group members and the Chief Privacy Officer or GE Vernova's Global Director, Privacy Program and Compliance, assesses that the Commitment, even if accompanied by supplementary measures, cannot be complied with for a Cross-Border Transfer, or if instructed by a Competent Supervisory Authority, it shall suspend the Cross-border Transfer at stake, as well as all Cross-border Transfers for which the same assessment and reasoning would lead to a similar result, until compliance is again ensured or the Cross-border Transfer is ended.

Following such a suspension, the Data Exporter has to end the Cross-border Transfer if this Commitment cannot be complied with and compliance with this Commitment is not restored within one month of suspension. In this case, Personal Information that have been transferred prior to the suspension, and any copies thereof, should, at the choice of the Data Exporter, be returned to it or destroyed in their entirety.

The involved GE Vernova Group members and the Chief Privacy Officer or GE Vernova's Global Director, Privacy Program and Compliance informs all other GE Vernova Group members of the assessment carried out and of its results, so that the identified supplementary measures are applied in case the same type of Cross-border Transfers is carried out by any other GE Vernova Group member or, where effective supplementary measures could not be put in place, the Cross-border Transfers at stake are suspended or ended.

Data Exporters monitor, on an ongoing basis, and where appropriate in collaboration with Recipient GE Vernova entities, developments in national laws and practices of third-

countries to which Personal Information is transferred and that could affect the initial assessment of the level of protection and decisions taken accordingly on such Cross-border Transfers.

ii. Public authority request for access to Personal Information

In the event a GE Vernova entity member, acting as a Data Importer when using this Commitment as a tool for Cross-border Transfers, receives a legally binding request by a public authority under the laws of the country of destination, or of another third country, for disclosure of Personal Information transferred pursuant to the Commitment, it promptly notifies the Data Exporter, and where legally permissible the concerned data subjects, with the help of the Data Exporter where necessary. Such notification includes information about the Personal Information requested, the requesting authority, the legal basis for the request and the response provided.

In the event a GE Vernova entity member, acting as a Data Importer when using this Commitment as a tool for Cross-border Transfers, becomes aware of any direct access by a public authority to Personal Information transferred pursuant to the Commitment, in accordance with the laws of the country of destination, it promptly notifies the Data Exporter, and where possible the concerned data subjects, with the help of the Data Exporter where necessary. Such notification includes all information available to the Data Importer.

In both cases, if the Data Importer is prohibited from notifying the Data Exporter, and/or the concerned data subjects, it uses its best efforts to obtain a waiver of such prohibition, with a view to communicate as much information as possible and as soon as possible, and documents its best efforts in order to be able to demonstrate them upon request to the Data Exporter.

The Data Importer provides the other GE Vernova entity members, at regular intervals, with as much relevant information as possible on the requests received (in particular, number of requests, type of data requested, requesting authority or authorities, whether requests have been challenged and the outcome of such challenges, etc.). If the Data Importer is or becomes partially or completely prohibited from providing the Data Exporter with the aforementioned information, it informs, without undue delay, the Data Exporter accordingly. It also preserves the abovementioned information for as long as the Personal Information are subject to the safeguards provided by the Commitment and shall make it available to the Competent Supervisory Authorities upon request.

The Data Importer reviews the legality of the request for disclosure, in particular whether it remains within the powers granted to the requesting public authority, and challenges the request if, after careful assessment, it concludes that there are reasonable grounds to consider that the request is unlawful under the laws of the country of destination, applicable obligations under international law, and principles of international comity.

The Data Importer, under the same conditions, pursues possibilities of appeal.

When challenging a request, the Data Importer seeks interim measures with a view to suspending the effects of the request until the competent judicial authority has decided on its

merits. It does not disclose the Personal Information requested until required to do so under the applicable procedural rules.

It documents its legal assessment and any challenge to the request for disclosure and, to the extent permissible under the laws of the country of destination, make the documentation available to the Data Exporter. It also makes it available to the Competent Supervisory Authorities upon request.

It only provides the minimum amount of information permissible when responding to a request for disclosure, based on a reasonable interpretation of the request.

When responding to a request for disclosure, any GE Vernova shall not disclose GE Vernova Personal Information to any public authority to the extent such disclosure would be massive, disproportionate and indiscriminate, in a manner that would go beyond what is necessary in a democratic society.

iii. Non-compliance with the Commitment

No Cross-border Transfer is made to a GE Vernova entity until it is effectively bound by this Commitment and can deliver compliance.

In the event a Data Importer is not, or unable to be, in compliance with the Commitment, even with the implementation of supplementary measures, for whatever reasons, the Data Importer shall promptly inform the Data Exporter. When the Data Exporter is aware of such non-compliance, it shall suspend the Cross-border Transfers.

At the choice of the Data Exporter, the Data Importer shall immediately return or delete the transferred Personal Information, including any copies of it that has been transferred under the Commitment in its entirety, where:

- the Data Exporter has suspended the Cross-border Transfer and compliance with the Commitment cannot be restored within a reasonable time, and in any event within one month of suspension;
- the Data Importer is substantially or persistently out of compliance with the Commitment; or
- the Data Importer fails to comply with a binding decision of a competent court or a Competent Supervisory Authority regarding its obligations under this Commitment

Until such Personal Information is deleted or returned, the Data Importer should continue to ensure compliance with this Commitment. The Data Importer will certify the deletion of the Personal Information to the Data Exporter.

Where the Data Importer is prevented by law from returning or destroying such Personal Information to the Data Exporter, the Data Importer informs the Data Exporter, and ensures compliance with the Commitment and ceases from further Processing that Personal Information except as required by law.

For cases where applicable local laws and/or practices affect compliance with the Commitment, provisions under III(b)i above will apply.

IV. Information Security

a. Measures

GE Vernova aims to protect Personal Information against unauthorized or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organization measures through the application of appropriate technical and organizational measures designed to achieve its integrity, confidentiality, security and availability.

The precise measures in each case depend on the risks, the possible consequences for the rights and freedoms to individuals, the sensitivity of the information, the state of technological art, the nature, scope, context and purposes in which the Processing is carried out, the costs of implementation of the measures, and (where appropriate) the obligations contained in any Applicable Privacy Law or under any agreement.

Such measures may include, where appropriate, in accordance with EEA Privacy Laws:

- the pseudonymization and encryption of Personal Information;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of Processing systems and services;
- the ability to restore the availability and access to Personal Information in a timely manner in the event of a physical or technical incident;
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the Processing.

Assessment of the appropriate level of security shall take into account in particular the risks that are presented by Processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Information transmitted, stored or otherwise processed.

In respect of privacy incidents that involve EEA Personal Information, GE Vernova notifies without undue delay such incidents to:

- its EEA Liable GE Vernova Entity and to the GE Vernova Chief Privacy Officer;
- the EEA GE Vernova Entity acting as a controller when a GE Vernova Entity member of the Commitment, acting as a processor, becomes aware of a privacy incident;

- the Competent Supervisory Authority, where feasible, not later than 72 hours after having become aware of the privacy incident, unless the privacy incident is unlikely to result in a risk to the rights and freedoms of natural persons; and
- individuals for whom such privacy incidents are likely to result in a high risk to their rights and freedoms, where GE Vernova Entity acting as controller or Data Exporter is required to do so under EEA Privacy Laws.

In accordance with EEA Privacy Laws, GE Vernova keeps a record of all privacy incidents affecting GE Vernova Personal Information, comprising details of the privacy incident, its effects and the remedial action taken. GE Vernova makes these records available to its Competent Supervisory Authority on request.

b. Confidentiality

GE Vernova maintains the confidentiality of Personal Information that GE Vernova processes, except where disclosure is required by an applicable operational or legal requirement. This obligation shall continue even after the relationship with the individual has ended.

V. Implementing the Commitment

a. Accountability

GE Vernova is responsible for fulfilling the requirements set out in this Commitment and under Applicable Privacy Law. In particular, GE Vernova:

- is responsible for compliance with the requirements of this Commitment and of Applicable Privacy Law; and
- has the necessary internal mechanisms in place to demonstrate such compliance to individuals, and to Competent Supervisory Authorities, including maintaining records of all of its processing activities, both as controller and as processor, carried out on Personal Information transferred under this Commitment in accordance with Applicable Privacy Laws and whose content complies with and includes all elements required by EEA Privacy Laws, and making it available to Competent Supervisory Authorities on request.

Controller's record includes:

- The name and contact details of the controller and, where applicable, the joint controller, the controller's representative and the data protection officer;

- The purposes of the Processing;
- A description of the categories of data subjects;
- A description of the categories of Personal Information;
- The categories of recipients to whom the Personal Information have been or will be disclosed including recipients in third countries or international organisations;
- Cross-border Transfers of Personal Information to a third country or an international organisation, including the identification of that third country or international organisation and the description of the safeguards used;
- Where possible, the envisaged retention periods; and
- Where possible, a general description of the technical and organisational security measures.

Processor's record includes:

- The name and contact details of the processor or processors and of each controller on behalf of which the processor is acting, and, where applicable, of the controller's or the processor's representative, and the data protection officer;
- The categories of Processing carried out on behalf of each controller;
- Cross-border Transfers of Personal Information to a third country or an international organisation, including the identification of that third country or international organisation and the description of the safeguards used;
- Where possible, a general description of the technical and organisational security measures.

b. GE Vernova's Privacy Program

GE Vernova's privacy program includes:

- procedures to prevent, detect and resolve privacy incidents;
- the appointment of a Chief Privacy Officer, a Global Director, Privacy Program and Compliance and a network of Business Privacy Leaders with adequate qualifications, resources and powers for exercising their supervisory functions;

- a “Privacy by Design” approach and a “Privacy by Default” approach, which includes technical specifications and the development, implementation or adaptation of information systems and/or technologies which promote compliance with this Commitment, GE Vernova’s policies and procedures and EEA Privacy Laws;
- the use of privacy impact assessments, in particular where a Processing is using new technologies and is likely to result in a high risk to the rights and freedoms of individuals, and consulting with Competent Supervisory Authority, where a privacy impact assessment indicates that the Processing would result in a high risk in the absence of measures taken by the GE Vernova Entity acting as controller to mitigate the risk, before implementing or substantially modifying information systems and/or technologies for Processing Personal Information or new methods of Processing Personal Information; and
- the development and implementation of plans to respond to significant violations of this Commitment or any Applicable Privacy Law, including obligations to determine the cause and extent of any such violation, to describe its harmful effects and to take the appropriate measures to avoid future violations.

i. Training

GE Vernova’s privacy program also includes mandatory periodic education and awareness programs, with basic, appropriate and up to date training provided no less than once every two years for all employees.

In addition to this basic trainings, advanced privacy training are provided at least every three years to employees who process Personal Information, employees who supervise them and employees who make decision with respect to the Processing of Personal Information or in the development of tools used to process Personal Information.

Supplemental ad hoc role based training for employees who require it may also be provided, in addition to basic and advanced trainings, such as before launching a new business process, prior to deployment of a new application and to teams who more frequently process Personal Information.

These trainings focus on achieving a good understanding of the principles of this Commitment for all employees, and a thorough understanding of this Commitment and GE Vernova’s policies and procedures and Applicable Privacy Law for employees who have permanent or regular access to Personal Information or are involved in the collection of Personal Information or in the development of tools used to process Personal Information. Where appropriate to the employees’ roles, the supplemental ad hoc based training includes the subject of managing requests for access to Personal Information by public authorities

ii. Oversight program

As part of GE Vernova's privacy program, periodic audits or assessments are conducted on an annual basis. The audits and assessments can be performed on request by GE Vernova's Chief Privacy Officer. GE Vernova's oversight program covers all aspects of the Commitment, including methods to confirm remedial actions are implemented.

Audits and assessments are performed to verify compliance with the principles in this Commitment, GE Vernova's policies and procedures, and Applicable Privacy Law. For example, GE Vernova Internal Audit is an independent, objective assurance and advisory function, and it determines and performs periodic audits. GE Vernova Internal Audit reports to the Audit Committee of the Board of Directors. The output of oversight is shared with GE Vernova's Chief Privacy Officer, relevant business and privacy leaders, and senior leadership of the concerned GE Vernova Entity and of GE Vernova, including the Chief Financial Officer and Chief Legal Officer as appropriate.

Assessment and audit results can be accessed by Competent Supervisory Authorities upon request.

c. GE Vernova's Network of Privacy Leaders

Each GE Vernova business has an appointed Business Privacy Leader who belongs to the GE Vernova Privacy Working Group. This Group is global and operates under the strategic direction of the GE Vernova HQ Privacy Team who coordinate and lead GE Vernova's privacy program.

In addition, a Chief Privacy Officer is appointed and reports to the highest management level, and a GE Vernova HQ Privacy Team is in place that includes both GE Vernova senior management and a Global Director, Privacy Program and Compliance who is located in Europe. The Chief Privacy Officer can inform GE Vernova senior executive management for any issues encountered in the performance of their duties. The Chief Privacy Officer is responsible for monitoring GE Vernova group compliance with this Commitment and Applicable Privacy Laws.

The global Privacy Working Group is comprised of senior legal or compliance personnel from each GE Vernova business or critical function who have primary legal responsibility for privacy and data protection oversight within their business units or functions. These Business Privacy Leaders work with the stakeholders in their business unit or function to comply with Applicable Privacy Laws and to implement appropriate controls designed to detect, prevent, mitigate, and manage privacy and data protection risks arising in each business unit or function. The Chief Privacy Officer, the GE Vernova HQ Privacy Team and the Business Privacy Leaders can be contacted through the channels detailed under "Complaints, Concerns and other Feedback".

d. Interpretations of the Commitment

Interpretations of the scope of the Commitment, including legal entities covered by the Commitment and application of the Commitment to activities of GE Vernova and other operational elements of the Commitment, shall be resolved by the GE Vernova HQ Privacy Team, GE Vernova's Chief Privacy Officer and the global Privacy Working Group as appropriate. GE Vernova Entity-specific questions or operations shall be the responsibility of the Business Privacy Leader within the applicable business unit.

e. Cooperation and Coordination with Competent Supervisory Authorities

GE Vernova cooperates with any Competent Supervisory Authority which questions any Processing of Personal Information by GE Vernova, including providing the Competent Supervisory Authority with information about the Processing operations covered by the Commitment, and GE Vernova takes into account the advice of such Competent Supervisory Authority or comply with such Competent Supervisory Authority's decisions on any issue related to this Commitment. GE Vernova's Chief Privacy Officer or his or her designee is responsible for such cooperation.

In addition, GE Vernova consents to audits and inspections, including where necessary on-site, initiated by these authorities or, in the case of Processing of EEA Personal Information, by the designated EEA Lead Data Protection Authority and / or other EEA Competent Supervisory Authorities, as required by Applicable Privacy Law for the exercise of such authority's responsibilities. GE Vernova provides the Competent Supervisory Authorities with access to the results of any audit in relation to implementation of the Commitment upon request.

In case of dispute relating to the EEA Competent Supervisory Authority's exercise of supervision of compliance of the Commitment, this will be resolved by the national competent courts where this authority is localized, in accordance with national procedural laws. The GE Vernova Entity members of this Commitment will submit themselves to the jurisdiction of these courts.

VI. Individual Rights

In accordance with EEA Privacy Laws and the Commitment, an individual who has satisfactorily established his or her identity to GE Vernova may exercise the following rights in relation to GE Vernova Personal Information GE Vernova holds about him or her. Should GE Vernova determine that the exercise of a right under this section of the Commitment is not valid, GE Vernova informs the individual of the reasons that led to this conclusion.

a. Information

For GE Vernova Personal Information, and where required by EEA Privacy Laws, GE Vernova makes the following information available to individuals at the point of collection or, where the Personal Information is not obtained from the relevant individual, within a reasonable period up to 1 month of such collection, at the first communication with the individual or at the first disclosure to another recipient:

- GE Vernova's identity and contact details;
- contact details for the data protection officer, where applicable;
- the intended purpose and legal basis of the Processing;
- any intended recipients or categories of recipients of the Personal Information;
- any intended Cross-border Transfers;
- the categories and the source(s) of any GE Vernova Personal Information not collected directly from the individual, except where a disproportionate effort is required to identify such source(s);
- how individuals may exercise their rights with regard to the GE Vernova Personal Information; and
- additional explanations to the extent necessary to support fair and transparent Processing, such as: (i) retention of Personal Information; (ii) data subject rights; (iii) why the Personal Information is required and whether providing it is mandatory; (iv) possible consequences of not providing the Personal Information; and (v) the existence and details of any automated decision-making, including profiling.

In compliance with EEA Privacy Laws, such information is not provided to individuals insofar as they already have such information.

When the Personal Information is not obtained from the relevant individuals, such information would also not be provided to individuals if provision proves impossible or would involve a disproportionate effort, in which case GE Vernova should take appropriate measures under EEA Privacy Laws, or if other rules already protect such information, for example if obtaining or disclosure of such information is expressly laid down by EEA Privacy Laws or if such information is protected by a professional secrecy under EEA Privacy Laws, including a statutory obligation of secrecy.

b. Access: Individuals may see information

Following a request by an individual, GE Vernova provides him or her with the GE Vernova Personal Information which GE Vernova holds, including the source of the Personal Information, the purposes of any Processing of that Personal Information by GE Vernova, the categories of Personal Information concerned, the recipients or categories of recipients to whom such Personal Information is or will be disclosed, where possible the envisaged period for which the Personal

Information will be stored or if not possible the criteria used to determine that period, the existence of the right to request rectification or erasure of Personal Information or restriction of Processing of Personal Information or to object to such Processing, the right to lodge a complaint with a Competent Supervisory Authority and if any, the existence of automated decision-making, including profiling, meaningful information about the logic involved as well as the significance and the envisaged consequences of such Processing for the individual.

c. Correction and Deletion: Valid requests for correction, deletion should be respected

An individual has the right to ask GE Vernova to correct or delete GE Vernova Personal Information about him or her that may be incomplete, inaccurate or excessive.

Where the request is valid, GE Vernova rectifies or deletes the information as requested and, where reasonable to do so, confirms to the individual that it has done so. Where they are known and it is reasonably practicable to do so, GE Vernova also notifies this fact to any third party to whom the GE Vernova Personal Information has been disclosed.

Deletion of Personal Information is not valid when it must be retained for the performance of an obligation imposed on GE Vernova by any applicable law, or by the contractual relationship between GE Vernova and the individual, or in the context of a dispute, or other legal retention requirement.

d. Restriction of Processing of Personal Information

An individual also has the right to request the restriction of any Processing of GE Vernova Personal Information by GE Vernova, to the extent such right is provided for under EEA Privacy Laws, for example where the accuracy of the GE Vernova Personal Information is contested. In respect of EEA Personal Information, GE Vernova ceases Processing such information where the restriction is justified, with the exception of storage and other permitted continued Processing under Applicable Privacy Law, and where reasonable to do so, confirms to the individual that it has done so.

e. Notification regarding rectification or erasure or restriction

The GE Vernova entity acting as controller shall communicate any rectification or erasure of Personal Information or restriction of Processing carried out in accordance with EEA Privacy Laws to each recipient to whom the Personal Information have been disclosed, unless this proves impossible or involves disproportionate effort.

Upon request to the GE Vernova entity acting as controller, an individual has the right to be informed by the GE Vernova entity acting as controller about those recipients.

f. Objections

Any individual has the right to object to the Processing of GE Vernova Personal Information by GE Vernova on grounds related to his or her specific personal situation, for example, where the individual's life or health is at risk due to the Processing of GE Vernova Personal Information.

An individual also has the right to object to any such Processing, without cause, to the extent such right is provided for under EEA Privacy Laws, for example where the Processing is carried out for direct marketing purposes. In respect of EEA Personal Information, GE Vernova ceases Processing such information where the objection is justified or otherwise legitimate in accordance with EEA Privacy Laws. The exercise of this right to object may be superseded where GE Vernova can demonstrate that its compelling legitimate interest in continuing the Processing overrides the interests or fundamental rights and freedoms of the individual.

Where EEA Privacy Laws permits, an individual may object to the Processing of GE Vernova Personal Information by GE Vernova for marketing purposes.

GE Vernova may also process GE Vernova Personal Information collected through the use of passive collection technologies such as cookies and similar technologies to display advertising, manage advertising on the Internet, or to provide advertising based on an individual's browsing activities and interest. Where this is the case, GE Vernova provides individuals with means of opting out of interest-based advertising.

g. Automated Processing, including profiling

An individual also has the right to object to decisions that are based solely on automated Processing (including profiling) of GE Vernova Personal Information and that produce legal effects that significantly affect the individuals involved, except when the decision was specifically requested by that individual, when the Processing is necessary for the establishment, maintenance or performance of a legal relationship between GE Vernova and the individual with respect to applicable local law, when the Processing is authorised by EEA Privacy Laws or is based on the individual's explicit consent.

GE Vernova shall implement suitable measures to safeguard the individual's rights and freedoms and legitimate interests, at least the right for the individual to obtain human intervention on the part of GE Vernova, to express his or her point of view and to contest the decision. Such decisions shall not be based on special categories of personal data.

h. Complaints, Concerns and other Feedback

Any individual who claims to have suffered damage as a result of non-compliance by a GE Vernova Entity with this Commitment, or any individual who has any other concerns or complaints or otherwise wishes to provide feedback in connection with this Commitment, may file an inquiry via the following channels:

- Internal concern reporting: <https://integrity.gevernova.net>
- External concern reporting: Corporate.Ombuds@gevernova.com, or Individual GE businesses may provide additional means of submitting inquiries or complaints.
- GE Vernova's postal address: GE Vernova International LLC, 58 Charles Street, Cambridge, MA 02141 , USA
- Privacy-related complaints and concerns are directed to, and addressed by, GE Vernova's network of Business Privacy Leaders, GE Vernova's Chief Privacy Officer, or GE Vernova's Global Director, Privacy Program and Compliance , as applicable, and shall be addressed promptly. Individuals can also contact the privacy team at dataprotectionoffice@gevernova.com.

GE Vernova endeavors to respond to complaints within one month of receipt and, in the event of any delay in responding (which in any case shall not exceed a further period of two (2) months) or in case of rejection of the complaint, GE Vernova informs the complainant within one month, giving reasons for the delay.

If GE Vernova considers the complaint to be justified, it takes reasonable steps to resolve the complaint to the reasonable satisfaction of the individual.

If the individual is unsatisfied by GE Vernova's response to the complaint (including where GE Vernova has rejected the complaint), the individual may exercise his or her enforcement rights under the Enforcement Rights section of the Commitment.

VII. Enforcing the Commitment

a. Third-party beneficiary clause

Any individual whose Personal Information is directly transferred or transferred as part of an Onward Transfer in the context of this Commitment would be considered as a third-party beneficiary and would benefit from the third-party beneficiary rights to enforce this Commitment mentioned in the section "Enforcement Rights" hereafter.

With respect to GE Vernova Personal Information that is EEA Personal Information, an individual who has suffered damage as a result of non-compliance with this Commitment by any

of the entities of GE Vernova bound by the Commitment, is entitled to directly enforce this Commitment against the GE Vernova Entity responsible for this damage, or if this GE Vernova Entity is located outside the EEA, to the EEA Liable GE Vernova Entity and to receive compensation for the damage suffered as required under EEA Privacy Laws, to the extent that the non-compliance relates to any of the following provisions of this Commitment mentioned in the section hereafter.

A third-party beneficiary is entitled to directly enforce this Commitment against the relevant GE Vernova Entity regarding the following provisions, where provided for in law:

- duty to respect data protection principles, including lawfulness of the Processing (II: Processing of Personal Information);
- duty to implement appropriate technical and organizational security measures (IV.A: Information Security – Measures);
- duty to notify the supervisory authority and the data subjects in case of a security and privacy incident relating to GE Vernova Personal Information (IV.A.: Information Security – Measures);
- duty to respect restrictions regarding Onward Transfers (II.H Processing of Personal Information - Restrictions on Onward Transfers);
- duty to respect transparency principle and provide easy access to the Commitment (II.E: Processing of Personal Information - Transparency);
- right to complain through internal mechanisms (VI.H: Individual Rights – Complaints, Concerns and other Feedback);
- duty to respect exercise of applicable rights (VI.A to H: Individual Rights – Information, Access, Correction and Deletion, Restriction, Notification regarding rectification, erasure or restriction, Objections and Automated Processing, including profiling), including rights of information, access, rectification, erasure, restriction, notification regarding rectification or erasure or restriction, objection to Processing, right not to be subject to decisions solely on automated Processing, including profiling;
- obligations in case of local laws and practices affecting compliance with the Commitment and in case of public authorities access requests (III.B.i National Laws and Practices, III.B.ii Public authority request for access to personal information, VII.A. Third-party beneficiary clause);
- duty to inform data subjects about any update of the Commitment and of the list of the GE Vernova entity members (VIII: Changes to the Commitment);

- duty to cooperate with the Competent Supervisory Authorities (V.E: Implementing the Commitment – Cooperation and Coordination with Supervisory Authorities);
- provisions in relation to liability, compensation and jurisdiction (VII-B: Enforcing the Commitment – Liability, VII.C. Liability); or
- duty to be transparent where national legislation affects compliance with this Commitment (V.A: Implementing the Commitment – Accountability).

b. Redress mechanism

An individual, whose Personal Information is subject to the Commitment, has the right to judicial remedies and the right to obtain redress. He or she is entitled to receive, where appropriate, compensation where the commitments listed under VII.A. above were breached, by direct recourse to the courts or other judicial authority, and may be represented by a not-for-profit body, organization or association in accordance with applicable law.

In respect of EEA Personal Information, such individual may enforce his or her rights as provided in this Commitment against: (i) the non-compliance of a GE Vernova Entity (if in the EEA), or (ii) the EEA GE Vernova Entity exporting Personal Information (if the non-compliance of the GE Vernova Entity is outside the EEA).

A data subject has a right to lodge a complaint by direct recourse to the competent courts or other judicial authority in the jurisdiction where the relevant GE Vernova Entity against which the claim is brought has an establishment, or in the jurisdiction of the data subject's place of habitual residence. In the same manner, again in respect of EEA Personal Information, a data subject may pursue an administrative remedy before a competent data protection authority in his or her habitual place of residence, place of work, or in the place in which the alleged infringement occurred, against the GE Vernova Entities referred to directly above.

Where permitted under the EEA Privacy Laws or a EU Member State law, or under the Data Exporter law if the breach is performed by a GE Vernova Entity located outside the EEA, GE Vernova may specify alternative mechanisms for resolving disputes that should remain secondary options to the direct redress options.

In respect of claims concerning EEA Personal Information, where an individual demonstrates that they have suffered damage and establishes facts which show it is likely that the damage has occurred because of non-compliance with the Commitment, the GE Vernova Entity responsible for the damage, or if it is located outside the EEA, the EEA Liable GE Vernova Entity, will need to prove that the alleged GE Vernova Entity or external sub-processor was not responsible for non-compliance of the Commitment giving rise to those damages or that no such non-compliance took place.

c. Liability

The Commitment's liability is shared between the GE Vernova Entities according to the following scheme:

- The GE Vernova Entity against which rights may be enforced (above), that is to say the entity acting as Controller of the individual's Personal Information, takes necessary remedial actions and assumes liability for the damages caused to individuals for GE Vernova Personal Information, as a result of Processing of Personal Information that has infringed any provisions of this Commitment, unless GE Vernova can demonstrate that the damage could not be attributed to GE Vernova or a GE Vernova supplier.
- If this GE Vernova Entity is located outside the EEA, the courts or other judicial authorities in the EEA will have jurisdiction, and individuals will in that case have the rights and remedies against the EEA Liable GE Vernova Entity as if the violation had been caused by the latter in the EU Member State in which it is based, instead of the GE Vernova Entity outside the EEA.

The above liabilities are not affected by any action GE Vernova may take against any supplier or other party involved in Processing of Personal Information. GE Vernova recognizes that it may also be liable for penal, civil, or administrative penalties arising in case of non-compliance with any Applicable Privacy Law.

GE Vernova anticipates that the steps it has taken to comply with Applicable Privacy Law under its privacy program, referred to in Section V above, will be considered when determining the application or extent of any liability or penalty which may be imposed upon GE Vernova for non-compliance with any Applicable Privacy Law.

VIII. Changes to the Commitment

GE Vernova reserves the right to modify the Commitment as needed, for example, to comply with changes in law, regulations, GE Vernova practices and procedures, or requirements imposed by Competent Supervisory Authorities. GE Vernova's HQ Privacy Team records changes made to the Commitment and prior to making a material change to the Commitment, GE Vernova will: (i) submit the Commitment to the Competent Supervisory Authorities (via its EEA Lead Data Protection Authority) in accordance with EEA Privacy Laws; (ii) notify individuals whose Personal Information is subject to the change via a notice on the GE Vernova website; (iii) notify without undue delay all GE Vernova Entities that are bound by this Commitment.

GE Vernova will provide a list of GE Vernova Entities that are bound by the Commitment, along with a report on any changes to the Commitment, once per year, to competent supervisory authorities via its EEA Lead Data Protection Authority. GE Vernova will also inform the EEA

Lead Data Protection Authority when no changes have been made. GE Vernova follows a centralized approach to managing lists of its entities. This is overseen by the Legal Entity Governance function of GE Vernova.

Where a change will affect the level of protection offered by this Commitment or otherwise significantly affect this Commitment, it will be communicated in advance to the Competent Supervisory Authorities through the EEA Lead Data Protection Authority, with a brief explanation of the reasons for the changes. GE Vernova will also provide related information to individuals or the Competent Supervisory Authorities upon request where required by EEA Privacy Laws.

IX. Termination

A GE Vernova Entity that ceases to be bound by the Commitment may retain, return or delete Personal Information transferred to it under the Commitment in accordance with applicable GE Vernova retention schedules. Where that GE Vernova Entity retains such Personal Information, it will maintain the confidentiality of that Personal Information and protect it in accordance with applicable GE Vernova policy, including applicable provisions of this Commitment, and Applicable Privacy Law.

This Commitment was last updated: October 2025