PRIVACY POLICY – Teramot Platform

Important Information on Data Protection	
Data Controller	Identity: Leonardo Ruspini, CTO, leo@teramot.com
Data Protection Officer	Leonardo Ruspini, CTO, leo@teramot.com
Purposes	Management of Services to be provided upon request of the interested party, or in compliance with legal obligations.
Recipients	Your data will not be transferred to third-party recipients.
Rights	 Access. Rectification. Erasure. Restriction of processing. Data portability. Objection and automated individual decision-making.
Details	The information is provided in extensive detail below this box.

This Privacy Policy (hereinafter, the "**Privacy Policy**") applies to the use of services provided through the Platform (hereinafter, the "**Platform**") by Halley S.A. and its affiliates (hereinafter, "**TERAMOT**" and together with the user, the "**Parties**" and each one of them, the "**Party**").

Furthermore, this Privacy Policy will use denominations and definitions established in the Terms and Conditions (hereinafter, the **"Terms and Conditions"**), a document that will complement this one. The use of the Service expresses the User's full and unreserved acceptance of the Terms and Conditions for using the Service published by TERAMOT on the Platform, at the following link: <u>TERAMOT Terms and Conditions</u>.

Merely accessing the Platform and/or using the Service grants the person doing so the status of a TERAMOT user (hereafter the **"User"**) and expresses full and unreserved acceptance of each and every clause of the Privacy Policy in the version published by TERAMOT at the very moment that the User accesses the Platform or uses the Service. Consequently, the Privacy Policy will constitute a valid and binding agreement between the User and TERAMOT regarding privacy.

BEFORE BROWSING AND/OR USING THE PLATFORM AND/OR THE SERVICES, PLEASE CAREFULLY READ THIS PRIVACY POLICY AND THE

TERMS AND CONDITIONS. IF THE USER DOES NOT AGREE WITH THEM, THEY MUST REFRAIN FROM USING THE PLATFORM AND/OR THE SERVICES.

For TERAMOT, the User's personal data privacy is very important. If the User has any questions about the Privacy Policy, or about the Platform, they should contact TERAMOT at any time by sending an email to info@teramot.com.

1. USER INFORMATION COLLECTION. PURPOSES.

1.1. Who is the Data Controller responsible for processing your data?

The following are the details of the data controller:

Identity: Leonardo Carlos Ruspini Data controller's contact details: leo@teramot.com Address: Blusuvol alle 3, city of Trondheim, Norway

1.2. The User agrees that TERAMOT may collect information using cookies, tags, and other methods (such as the information provided by the User when registering and/or using the Platform and/or the Service).

1.3. Additionally, TERAMOT may collect and/or store the User's IP (Internet Protocol) number or address for the purpose of improving the quality of the Service provided through the Platform. TERAMOT's storage of the User's device IP number allows identification at the time of access to their individual accounts. It also facilitates the diagnosis of any potential connection problems that may arise on the Platform, thereby improving the quality of the Service.

The IP (Internet Protocol) number or address is a numerical identification that distinguishes an electronic computing device (whether it be a computer, a personal phone with network access, a tablet, a PDA, etc.) when it connects to a computer network (for instance, the Internet).

TERAMOT offers Users the possibility of accessing a contact module to communicate with TERAMOT (hereinafter, the **"Contact Form"**). For this purpose, TERAMOT may request from the User and store the following personal data: (i) first and last name and/or company name; (ii) email address; (iii) ID number and/or tax ID (CUIT); (iv) telephone number; (v) and other data that the User provides for the purpose of applying to be an employee or representative of Teramot; hereinafter, the **"Personal Data"**. The collection of information allows for offering the User a personalized Service that meets their needs to provide the best possible experience.

1.4. TERAMOT may collect information from the User using cookies and/or tags or any other method of automated information detection provided by the tools offered by the Platform. The information collected by TERAMOT may include browsing behavior, IP address, logs, and other types of information.

2. <u>USE OF THE USER INFORMATION COLLECTED.</u>

2.1. TERAMOT will store and use the information provided by the User and collected by TERAMOT for as long as necessary to fulfill the purpose of analyzing it and to provide Users with the best possible Service.

2.2. Anyone who has provided personal contact information through the TERAMOT Platform may send an email to info@teramot.com in order to update, delete, and/or correct their personal contact information. TERAMOT will respond to such request within 5 (five) days following its receipt via email.

2.3. TERAMOT will use the information provided by Users and collected by TERAMOT to analyze behaviors and patterns of Users as such, including their geographical locations, usage sessions, time spent on the Platform, frequency of use, in order to try to improve its Service and try to provide them with better solutions to their needs.

2.4. The TERAMOT Platform may contain links to other Internet sites that are not owned by TERAMOT. As a result, TERAMOT will not be responsible for the actions of such Internet sites, to which this Privacy Policy does not apply. We recommend reviewing the privacy policy detailed on such Internet sites to understand their information collection practices and how they protect your personal data.

2.5. TERAMOT will retain the Personal Data provided by the User for as long as the User uses the Platform and/or the Service for the purpose of providing the best Service.

2.6. Once the relationship between the Parties ends, for whatever reason, TERAMOT reserves the right to retain the mentioned information for a period of 10 years and/or until the purpose for processing them is completed. After the specified period, TERAMOT will proceed to the destruction of the Personal Data.

2.7. TERAMOT will use the information provided by Users and collected by TERAMOT if requested by courts or national or international state entities that require it and make a corresponding request.

3. <u>DATA TRANSFER</u>

3.1. Only to fulfill the purposes established in this Privacy Policy and to provide the Service, TERAMOT may disclose the Personal Data and/or personal information, when necessary, to authorities, TERAMOT partners, and other third parties, such as third-party service providers used in connection with the Service.

3.2. In some cases, personal information may be transferred outside of the country where the Personal Data is collected to countries with the same or higher levels of protection. If personal information is transferred to countries with lower levels of protection, TERAMOT will make those transfers subject to appropriate safeguards and security measures, such as the standard data protection clauses adopted in the respective agreements or approved by the applicable legal authority.

3.3. In other cases for different jurisdictions, such as the European Union and the European Economic Area ("EU/EEA"), including but not limited to, Personal Data may be transferred outside of where TERAMOT operates. Such transfers outside of the EU/EEA are made subject to appropriate safeguards and security measures, such as the standard data protection clauses adopted in the respective agreements or approved by the EU Commission pursuant to the GDPR. The applicable standard data protection clauses in the respective agreements may be available for review by the Users upon request.

4. <u>MINORS</u>

4.1. Although the Platform and/or the Service are not directed at minors, in the event that a minor gains access to them, their use must be supervised by parents, guardians, or legal representatives. The Platform and/or the Service are only allowed for those who are of legal age to enter into contracts and are not legally restrained or in any way prohibited from exercising legal acts, rights, and/or obligations. Given this, minors under the age of 18 are not allowed to access the Platform and/or use the Service, nor are they allowed to provide any Personal Data or any other type of information.

5. <u>CONFIDENTIALITY AND SECURITY OF INFORMATION.</u>

5.1. TERAMOT has implemented reasonable security measures to protect User information and prevent unauthorized access to their data or any unauthorized modification, disclosure, or destruction of it. The information collected by TERAMOT or provided by the User will be maintained in strict confidence. Access to Personal Data is restricted to those employees, contractors, suppliers, operators, and representatives of TERAMOT who need to know such data to perform their duties and develop or improve the Service.

5.2. Despite these measures, considering that the internet is an open, publicly accessible system, TERAMOT cannot guarantee that unauthorized third parties will never be able to overcome the security measures and use User information inappropriately..

5.3. Despite the measures put in place, given that the internet is an open system with public access, TERAMOT cannot guarantee that unauthorized third parties will never be able to overcome the security measures and misuse the User's information

6. <u>CHANGES IN CORPORATE STRUCTURE.</u>

6.1. TERAMOT reserves the right to transfer the information collected in the event of a sale or merger of TERAMOT, or an acquisition of TERAMOT's major assets, or any other type of transfer of TERAMOT to another entity and/or among TERAMOT entities. In such a case, TERAMOT shall take

reasonable measures to ensure that such information is used in a manner consistent with the Privacy Policy.

7. <u>USER RIGHTS OVER INFORMATION.</u>

7.1. Regarding the processing of your personal data, you have the right to request from TERAMOT:

- Access: You can request confirmation on whether data concerning you are being processed, as well as additional clarifications about the information contained in this notice.
- **Rectification**: You can request the correction or completion of the data you have provided if they are inaccurate.
- **Erasure**: You can request the deletion of your data if they are no longer necessary for our purposes, in the event of revocation of consent, or your opposition to their processing, in case of unlawful processing, or if there is a legal obligation to delete.
- **Restriction**: You can request that your data be processed only for storage and not for other processing, during the time necessary to correct your data, in case of unlawful processing that you wish to eliminate, if you need to exercise your legal rights and the data we store may be useful to you, or, finally, if you oppose the processing and verification is underway to see if our legitimate interest prevails over yours.
- **Objection**: You can object at any time to the processing of your data unless our legitimate reasons for proceeding with the processing prevail over your own, for example, for the exercise of a right in court or our defense before a court.
- **Portability**: You can request to receive the data you have provided to us or have them transferred to another data controller you have indicated, in a structured, commonly used, and machine-readable format.
 - a. To this end, the User must send their Request by emailing with the subject "Access to Personal Data" to info@teramot.com. TERAMOT may require such User to provide identification, which can be verified by TERAMOT, as well as specify the Personal Data they wish to access, rectify, or remove.
 - b. TERAMOT may refuse to process Requests that are unreasonably repetitive or systematic, require disproportionate technical effort, endanger the User's privacy, or are considered impractical, or for which it is not necessary to access the Data.

c. The service to be provided for access to the rights mentioned above will be provided by TERAMOT free of charge, except in cases that require disproportionate or unreasonable effort, in which case an administrative fee may be charged.

7.2. If the User believes that their rights have been violated under current personal data protection laws, the User will have the authority to exercise the right of access, portability, rectification, or removal to the same at the applicable authority according to the country where the User is located, in accordance with the procedures and forms determined by such authorities in each case. If located in Europe, the applicable authorities on Data Protection rights are independent public authorities that oversee the Platform according to the European Data Protection Regulation and its applicable laws. These authorities provide expert advice on personal data protection issues and handle complaints filed in the event of any apparent violation of the General Data Protection Regulation (GDPR) and the relevant national laws. Each member state of the European Union has an appointed authority dedicated to protecting personal data, and if the User intends to make inquiries and/or complaints concerning the protection of their personal data, they should go to the authority of the member state where the User is located. To find the appropriate applicable authority, the User can visit the following link: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm (in English).

8. <u>EXCEPTIONS</u>

8.1. Despite any other provision to the contrary in the Privacy Policy, TERAMOT may disclose certain personal information of the User when it believes in good faith that such disclosure is reasonably necessary to:

- a) avoid a legal liability
- b) comply with a legal requirement, such as a search warrant, a subpoena, or a court order
- c) fulfill a request from a governmental or regulatory authority
- d) and/or protect the rights, property, or safety of TERAMOT, the User, or a third party..

9. <u>THIRD-PARTY SERVICES</u>

9.1. TERAMOT may use third-party services, for which it is not responsible for the information they collect nor the way they protect your personal information. For this purpose, each of these third-party services has its own privacy policies and provides, where available, a method by which the User can opt-out.

10. <u>CHANGES TO THE PRIVACY POLICY</u>

10.1. TERAMOT may modify the Privacy Policy at any time. New versions of the Privacy Policy will be notified by publishing such new version on the

Platform and notified through the contact methods provided by the User, as applicable.

11. <u>CONTACT</u>

11.1. If the User has any questions regarding the Privacy Policy or about the Platform itself, they should contact TERAMOT at any time via email at info@teramot.com.