

# Privacy Policy

Date: 29 July 2023

In this policy “we”, “us”, “our”, “Carbon Sarhat” and similar terms mean Carbon Sarhat Inc. and its affiliate companies.

At Carbon Sarhat, we understand how important your privacy is and are committed to protecting your personal data. This privacy policy will inform you how we look after your personal data when you visit our Website (regardless of where you visit it from).

Carbon Sarhat Privacy Policy governs your personal data which is processed in the context of an agreement entered into between you and us on the use of Carbon Sarhat solutions and services, including the use of our website and software.

In terms of this policy, ‘processing’ means any operation or set of operations which is performed on your personal data. This personal data may include personal details, details about the way you access our website and solutions.

This policy provides information on the processing, the legal basis upon which the Personal data is processed by us and how you may exercise your rights over your Personal Data.

We understand the importance of privacy to our customers and visitors to our Website. We are committed to protecting and respecting your privacy. This privacy policy has been created in order to demonstrate our firm commitment to your privacy.

This policy (together with our Terms & Conditions) sets out the basis on which any personal data we collect from you or that you provide to us, will be processed by us. Our policy has been to treat what we learn about our customers as confidential. We will not give or sell confidential or personal information about our customer to any third party not affiliated with their transaction, except as required by law or as necessary to provide Carbon Sarhat solutions and services to the customer.

As we collect and use information about visitors to our websites, we may contract with vendors to assist us in processing that information. These vendors are required to maintain the confidentiality of the information and are restricted from using the information for any purpose other than helping to provide Carbon Sarhat solutions and services to our customers.

Some of the information collected by Carbon Sarhat is personal data or data which relates to an identifiable person. Examples of personal data are names, addresses, e-mail addresses and telephone numbers. We never sell to third-parties information that could be used to specifically identify an individual customer or group of customers. Anonymous data, with all names, addresses and other personally identifiable information removed, is sometimes shared with third parties. Finally, we do provide personal data to government agencies as required by law or regulation.

In addition to the uses of the information described in the paragraphs above, we collect telephone numbers and e-mail addresses in the event that we have to contact designated parties to resolve a question or provide information.

## **INFORMATION CARBON SARHAT MAY COLLECT FROM YOU**

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site. This includes information provided at the time of registering to use our site, subscribing to our services, requesting, applying for or entering further services (including, but not limited to, promotion), making an enquiry or reporting a problem. This may include, but is not limited to, information such as your name, address, phone and email address.
- In order to improve our communications with you as well as improve our products and services, we may ask you to provide us with additional information about you such as your professional interests and your experiences with us as well as more detailed contact preferences. When you provide us with any personal information you consent to us collecting and using that information according to your preferences.
- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site and the resources that you access and/or download.
- As stated above, we require that you provide us with your email address to register for our services. In addition to collecting your email address, we may collect and process information about the device you use, location settings of the device, and your IP address. During the use of our services, we may require you to provide the following categories of personal data to access certain third parties or even our own services. Your provision of this personal data is always voluntary, but if certain personal data is not provided you may not be able to utilise all services: name, nationality, country of residence, address, phone number, place of birth, date of birth, identification document information, personal photo, biometric face scans, financial details, and company/workplace details.

## **CARBON SARHAT USE OF YOUR INFORMATION**

We use information held about you in the following ways:

- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To assess and improve the products and services that you use or may use.
- To verify your identity.
- To share with other companies within our group and reputable third organisations for marketing purposes provided we have your consent to do so.
- To notify you about changes or updates to our service.
- To carry out our obligations arising from any contracts entered into between you and us.
- To conduct audits, reviews and analysis of our internal processes, for action planning and managing commercial risks;
- To allow you to participate in interactive features of our service, when you choose to do so.
- If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you or which you have shown an interest in.
- If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

## DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any of our subsidiaries, our parent company and any of our parent company's other subsidiaries ("our group").

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If said third party provide services for us, limited to the following purposes:
  - Understanding the use of our site and making improvements.
  - Administering a mailing list for customers that have registered for such list.
  - Responding to requests from or providing any necessary notices to you.
  - Protecting the security or integrity of our site
  - Otherwise administering or managing our site software.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## YOUR RIGHTS AS USER OF CARBON SARHAT SOLUTIONS AND SERVICES

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the contact information below.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that CARBON SARHAT do not accept any responsibility or liability for these policies. Their inclusion cannot be taken to imply any endorsement or validation by us of the content of said website.

As soon as personal data is being processed, you may have the following rights:

- **Right of access;** You have the right to obtain confirmation as to whether or not your personal data is processed.
- **Right to rectification;** You are entitled to demand that we rectify your personal data if they are inaccurate or erroneous.
- **Right to restriction of processing;** You have the right to demand a restriction of processing for your personal data. This may result in us being able to longer offer you services. However, if we stop processing the Personal Data, we may use it again if there are valid grounds under data protection law for us to do so (e.g. to comply with regulatory obligations, for the defence of legal claims or for the protection of another natural or legal persons or for reasons of important public interest.

- **Right to erasure ('right to be forgotten');** You have the right to have your personal data erased without undue delay. This does not include your personal data that has to be stored due to statutory provisions or in order to assert, execute or defend legal claims. Please note that after deleting the Personal Data, we may not be able to provide the same level of servicing to you as we will not be aware of your preferences.
- **Right to data portability;** You have the right to receive your personal data provided to us in a structured, commonly used and machine-readable format. The relevant subset of Personal Data is data that you provide us with your consent or for the purposes of performing our contract with you.
- **Right to object;** You have the right to object at any time, on grounds relating to your particular situation, to processing of your personal data. CARBON SARHAT shall no longer process your personal data unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing is for the establishment, exercise or defence of legal claims.
- **Right to withdraw your consent;** You have the right to withdraw your consent under the data protection law at any time. Withdrawing your consent does not affect the lawfulness of processing based on consent before its withdrawal. The withdrawal of your consent regarding your personal data may lead to the termination of your contract as the whole contractual relationship between CARBON SARHAT and You is dependent on personal data.
- **Right to lodge a complaint with a supervisory authority;** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes on your privacy.

## RECIPIENTS OF DATA

To conduct our Services, we may use third party service providers to provide Carbon Sarhat with necessary services. We may transfer your personal data to these service providers for further processing based on your consent with this privacy policy or on the basis of your agreement to use our services. All transfer of data is undertaken by way of secure connections to these service providers. These service providers only receive your personal data that is adequate, relevant and limited to what is necessary in relation to the purposes for which your personal data are processed. These include the following categories of service providers: identification service providers, identity verification providers, monitoring services, server hosting providers, newsletter senders, customer relationship or support services, website hosting services, email sending services, web traffic analysis providers.

Additionally, through our services your data may be transferred to third parties so that you may register and maintain an account and/or business relationship with those services. You will be asked to consent to the transfer and continual transfer of your personal data to those individual third-party services upon the first transfer of your personal data. You may revoke your consent to their access to your personal data on our servers at any time. We may however be required to store your personal data on their behalf and send personal data to them again if there is a legal obligation to do so.

## LINKS TO OTHER SITES

Carbon Sarhat websites provides links to external sites as a convenience to the user. The inclusion of any link does not imply Carbon Sarhat endorsement of the external site company, its website, or the products and services it promotes and sells. Carbon Sarhat is not responsible for the privacy practices or the content of such websites.

## **SECURITY AND INTEGRITY OF INFORMATION**

We treat personal data as confidential and data that must be protected against loss and unauthorised access. We employ all reasonable measures to appropriately protect confidential information from unauthorised access by users inside and outside the company.

## **RETENTION OF CUSTOMER INFORMATION**

We retain information about customers as necessary for business purposes and as required by government regulation.

## **CARBON SARHAT WEBSITES**

### **What Information We Collect and How We Will Use It**

Users can visit most areas of the CARBON SARHAT's websites without revealing who they are or providing any information about themselves. However, some of our interactive services require that users identify themselves in order to enable the interactive functionalities. We may ask users to provide some personal information in these situations. If you voluntarily submit a customer support request via an email, chat or other correspondence system we will also process your personal data for the purpose of fulfilling such request.

### **Consent to Receive Promotional Material**

Carbon Sarhat allows users to opt out of receiving promotional material from us. The 'opt-out' feature applies to promotional material sent to our customers as a result of their participation in Carbon Sarhat programs and services. We may use your personal data in order to send you marketing information or emails if you have agreed to receive such. If you have agreed to such, then may also use the personal data that we collect in order to send you information on the products and services offered by Carbon Sarhat or its third-party partners.

### **IP Addresses**

CARBON SARHAT's websites collect IP addresses for system administration, security, and statistical analysis purposes. We log these addresses and analyze them to understand where requests originate so that we can provide the most efficient service, enhance security, ensure appropriate usage and produce traffic volume statistics.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

## **DATA RETENTION**

We retain personal data about or relating to you for as long as is necessary for the purposes for which such personal data was collected and take reasonable measures to destroy any personal data that is no longer necessary to meet those purposes.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page. This Policy may be amended or updated from time to time to reflect changes in our privacy practices with respect to the processing of personal data or changes in the applicable law. We encourage you to save this Privacy Policy locally on your computer and to regularly check this page so that you may review any changes we might make. If we make a material change to the Privacy Policy, you will be provided with appropriate notice.

## **ACCEPTANCE OF THIS POLICY**

By using our Website, you accept and agree to the terms of this policy. If you do not agree to this policy, you may not use our Website. Your continued use of the Website following the posting of changes to this policy will be deemed your acceptance of those changes.

## **CONTACTING CARBON SARHAT**

Your personal data will be processed and controlled by us. Carbon Sarhat is your data controller in the context of our solutions, services and your account with us.

If you have questions about this privacy statement, the practices of this site, or your experience on any of Carbon Sarhat's websites, you can contact:

Carbon Sarhat

email: [contact@carbonsarhat.com](mailto:contact@carbonsarhat.com)

Comments, suggestions or materials sent or transmitted to CARBON SARHAT shall be deemed to be non-confidential.