

PRIVACY POLICY

Last updated: 21st May 2021

1. PURPOSE

Arcturus Technologies Ltd. (hereinafter “Arcturus”) provides climate risk and sustainability data analytics at company and asset level. Arcturus takes the privacy and protection of personal information very seriously. By visiting the Arcturus website located at www.arcturus.io (the “Site”), registering as a Member, or using the Services, you acknowledge and accept the practices and policies outlined in this privacy policy (“Privacy Policy”). This Privacy Policy describes Arcturus’ practices with respect to Personal Information that we collect when you use the Services.

2. SCOPE

By using our Service or the Site, you consent to the collection, use, and disclosure of personally identifiable information (“PII”) as defined in the applicable statutes in of the United States, and Personal Data (“any information that relates to an identified or identifiable living individual”) as defined in the European Union General Data Protection Regulation (“GDPR” (EU) 2016/679) in accordance with this Policy. PII and Personal Data are collectively referred to in this Privacy Policy as “Personal Information”.

3. LEGAL BASIS FOR PROCESSING

The legal basis by which Arcturus may process Personal Information includes the following:

Individuals, directly or through their employers, have given their consent for one or more specific purposes, including without limitation, provision of Personal Information is necessary for the performance of an agreement with the individuals’ employer and/or for any pre-contractual obligations thereof;

Processing is necessary for compliance with a legal obligation to which Arcturus is subject;

Processing is necessary for the purposes of the legitimate interests pursued by Arcturus or by a third party.

4. TYPES OF PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

Among the types of Personal Information that our Service and/or Site collects, by itself or through third parties, there are: web browser cookies, usage data, email address, phone number, first name, last name, company name, profession, address, ZIP/Postal code, various types of machine data, field of activity, number of employees and data communicated while using the service.

Below are the ways we collect Personal Information and how we use it.

3.1 TYPES OF PERSONAL INFORMATION WE COLLECT

Arcturus collects Personal Information regarding its current, prospective, and former customers, users, visitors, and guests (collectively “**Individuals**”).

- **Information You Provide Directly to Us.** When you use the Services or engage in certain activities, such as registering for an account, requesting Services or information, or contacting us directly, we may ask you to provide some type of Personal Information such as name, address, phone number, email address, or mailing address.
- **Automatic Data Collection.** We may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, unique Service ID, mobile carrier, Advertiser ID, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, hardware type, operating system, Internet service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences.

3.2 INFORMATION FROM OTHER SOURCES. WE MAY RECEIVE INFORMATION ABOUT YOU FROM OTHER SOURCES, INCLUDING THROUGH THIRD-PARTY SERVICES AND ORGANIZATIONS TO SUPPLEMENT INFORMATION PROVIDED BY YOU. HOW ARCTURUS USES YOUR INFORMATION

We acquire, hold, use, and Process Personal Information about Individuals for a variety of business purposes, including:

- **To Provide Products, Services, or Information Requested.** Arcturus may use information about you to fulfill requests for products, Services, or information, including information about potential or future Services, including to:
 - Generally manage Individual information and accounts;
 - Respond to questions, comments, and other requests;
 - Provide access to certain areas, functionalities, and features of our Services;
 - Contact you to answer requests for customer support or technical support; and
 - Allow you to register for events.
- **Administrative Purposes.** We may use Personal Information about you for its administrative purposes, including to:
 - Measure interest in our Services;
 - Develop new products and Services;
 - Ensure internal quality control;
 - Verify Individual identity;
 - Communicate about Individual accounts and activities on our Services and systems, and, in our discretion, changes to any Arcturus policy;
 - Send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance;
 - Process payment for products or Services purchased;
 - Process applications and transactions;
 - Prevent potentially prohibited or illegal activities; or
 - Enforce our Terms.
- **Marketing Our Products and Services.** Arcturus may use Personal Information to provide you with materials about offers, products, and Services that may be of interest, including new content or Services. We may provide you with these materials by phone, postal mail, facsimile, or email, as permitted by applicable law. Such uses include:
 - To tailor content, advertisements, and offers;
 - To notify you about offers, products, and Services that may be of interest to you;
 - To provide Services to you and our sponsors; or
 - For other purposes disclosed at the time that Individuals provide Personal Information.

You may contact us at any time to opt out of the use of your Personal Information for marketing purposes, as further described below.

- **Research and Development.** Arcturus may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services. From time to time, Arcturus may perform research (online and offline) via surveys. We may engage Third-Party service providers to conduct such surveys on our behalf. All survey responses are voluntary, and the information collected will be used for research and reporting purposes to help us better serve Individuals by learning more about their needs and the quality of the products and Services we provide. The survey responses may be utilized to determine the effectiveness of our Services, various types of communications, advertising campaigns, and/or promotional activities. If an Individual participates in a survey, the information given will be used along with that of other study participants. We may share anonymous Individual and aggregate data for research and analysis purposes.
- **Direct Mail, Email and Outbound Telemarketing.** Individuals who provide us with Personal Information, or whose Personal Information we obtain from Third Parties, may receive periodic emails, newsletters, mailings, or phone calls from us with information on Arcturus' or our business partners' products and services or upcoming special offers/events we believe may be of interest. We offer the option to decline these communications at no cost to the Individual by following the instructions below.
- **Anonymous and Aggregated Information Use.** Arcturus may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the Site and the Services. Anonymized or aggregated information is not Personal Information, and we may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Arcturus and with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.
- **Other Uses.** Arcturus may use Personal Information for which we have a legitimate interest, such as direct marketing, individual or market research, anti-fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

3.3 COOKIES, LOCAL STORAGE, PIXEL TAGS/WEB BEACONS, ANALYTICS INFORMATION, AND INTEREST-BASED ADVERTISING

We, as well as Third Parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a “**device**”) that allow us to record certain pieces of information whenever you visit or interact with our Sites, Services, messaging, and tools, and to recognize you across devices.

- **Cookies.** Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Site and Services may not work properly.
- **Local Storage and Local Shared Objects:** We use local shared objects such as cookies and local storage to enhance your experience by storing your user preferences and settings on the Site and Services. Local storage is similar to browser cookies but can store data more complex than simple text. Like cookies, local storage can only access personal data that you have provided on the Site or Services. Various browsers may offer their own management tools.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Site and in our Services that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.
- **Social Media Buttons and Widgets:** Our Site includes social media features such as the LinkedIn and Twitter buttons. These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a Third Party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

Our uses of such Technologies fall into the following general categories:

- **Strictly necessary cookies,** which are first party cookies that must be set to allow us to deliver the Website to you and to provide specific services that you request from us. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. The

services offered by our Sites that require cookies in order to function include: account log-in, shopping basket/online store, billing and comments/blog features.

- **Performance cookies**, which are first party cookies that help us to collect information about how visitors use our site and helps us with site analysis and improvements. Performance cookies will remain on your computer after you close your browser. We use all information collected by these cookies in aggregated form, rather than linking it to individual Site users. Where permitted by applicable law, we will deploy first party performance cookies automatically when you visit our Site. If you opt out of, or do not allow, these cookies (as applicable), we will not know when you have visited our Site.
- **Functionality cookies**, which allow our site to remember your choices or preferences, such as information on online forms or previous orders. These cookies allow us to offer you a personalized experience while using the Site. They are not used to track your browsing activity on other websites. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- **Targeting cookies**, which are third party cookies set through our Site by our advertising partners. They are used by those companies to build a profile of your interests and show you relevant adverts on other websites. They do not directly store personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will still experience advertising but it will be less targeted to you.

If you would like to opt out of the Technologies we employ on our Site, Services, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits.

3.4 THIRD-PARTY WEBSITES, SOCIAL MEDIA PLATFORMS, AND APIS

The Site may contain links to other websites and other websites may reference or link to our Site or other Services. These other domains and websites are not controlled by us, and we do not endorse or make any representations about Third-Party websites or social media platforms. We encourage our users to read the privacy policies of each and every website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

The Site and our other Services may also contain links and interactive features with various social media platforms. If you already use these platforms, their cookies may be set on your device when using our Site or other Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such Third-Party services you assume the risk that the Personal Information provided by you may be viewed and used by third parties for any number of purposes.

We may use Third-Party code or APIs as part of the functionality of our Services.

4. ONWARD TRANSFER—ARCTURUS MAY DISCLOSE YOUR INFORMATION

4.1 INFORMATION WE SHARE

We may share your information as described in this Privacy Policy (e.g., with our Third-Party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.

- **We Use Vendors and Service Providers.** We may share any information we receive with vendors and service providers. The types of service providers (processors) to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of information and Services you have requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the Site and Services. Arcturus has entered into appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.
- **Business Partners.** We may share Personal Information with our business partners, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. We may also provide Personal Information to business partners whose products or services we believe may be of interest to you.
- **Marketing – Interest-Based Advertising and Third Party Marketing.** On our Site, Arcturus may allow Third-Party advertising partners to set tracking tools (e.g., cookies) to

collect information regarding your activities (e.g., your IP address, page(s) visited, time of day). These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit non-Arcturus related websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We may allow access to other data collected by the Site to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer that we do not share your Personal Information with Third-Party advertising partners, you may opt out of such sharing at no cost by following the instructions below.

- **Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures).** We may access, preserve, and disclose your Personal Information, other account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect your, our or others’ rights, property, or safety; (iv) enforce our policies or contracts; (v) collect amounts owed to us; (vi) prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) disclose your Personal Information in good faith where it is otherwise necessary or advisable.

In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, we will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

4.2 INTERNATIONAL DATA TRANSFERS

You agree that all Personal Information collected via or by Arcturus may be transferred, Processed, and stored anywhere in the world, including but not limited to the United States, the European Union, in the cloud, on our servers, on the servers of our affiliates or the servers of our

service providers. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to Arcturus, you explicitly consent to the storage of your Personal Information in these locations.

5. OPT-OUT (RIGHT TO OBJECT TO PROCESSING)

5.1 GENERAL

You have the right to object to and opt out of certain uses and disclosures of your Personal Information. Where you have consented to Arcturus' Processing of your Personal Information, you may withdraw that consent at any time and opt out of further Processing by contacting us at the address below.

5.2 EMAIL AND TELEPHONE COMMUNICATIONS

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding products or services you have requested. We may also send you certain non-promotional communications regarding Arcturus and our Services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy).

5.3 “DO NOT TRACK”

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

5.4 COOKIES AND INTEREST-BASED ADVERTISING

As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings. See <http://www.networkadvertising.org/mobile-choice>.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from our Third-Party advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at www.networkadvertising.org/managing/opt_out.asp, or <http://www.youronlinechoices.eu/>, <http://youradchoices.ca/choices/> and www.aboutads.info/choices/. You can also choose not to be included in Google Analytics [here](#).

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. Advertisements on Third-Party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners' use of this information for interest-based advertising purposes. Even if you opt out, we may still collect and use information regarding your activities on our Site and/or information from the advertisements on Third-Party websites for non-interest based advertising purposes, such as to determine how to optimize our Site and Services.

6. RIGHTS OF ACCESS, RECTIFICATION, ERASURE, AND RESTRICTION

You may inquire as to whether Arcturus is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend or delete your Personal Information where it is inaccurate. Where otherwise permitted by applicable law, you may contact us as described below or use any of the methods set out in this Privacy Policy to request access to, receive (port), seek rectification, or request erasure of Personal Information held about you by Arcturus. Please include your full name, email address associated with your account, and a detailed description of your data request. Such requests will be processed in line with local laws.

Although we make a good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which we are unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual's privacy in the case in question or where it is commercially proprietary. If we determine that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for

any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

7. DATA RETENTION

Arcturus retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

8. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Site or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Site or sending an e-mail to you. You may have a legal right to receive this notice in writing.

9. INTERNATIONAL USERS

By using the Site, Arcturus will transfer data to the United Kingdom, United States and other global jurisdictions. By choosing to visit the Site, utilize the Services or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the laws of England and Wales and the adjudication of any disputes arising in connection with Arcturus or the Site will be in accordance with the Terms.

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United Kingdom, the United States and to Processing of your data globally. By providing your Personal Information, you consent to any transfer and Processing in accordance with this Policy.

10. CHILDREN'S PRIVACY

The Services are not directed to children under 13 years of age (16 in some jurisdictions), and Arcturus does not knowingly collect Personal Information from children under 13 years of age (16 in some jurisdictions). If you learn that your child has provided us with Personal Information without your consent, you may alert us as described below. If we learn that we have collected any Personal Information from children under 13 years old (16 in some jurisdictions), we will promptly take steps to delete such information.

11. REDRESS/COMPLIANCE AND ACCOUNTABILITY

If you have any questions about our privacy practices, this Privacy Policy, or how to lodge a complaint with the appropriate authority, please contact us as described below. We will address your concerns and attempt to resolve any privacy issues in a timely manner.

12. OTHER RIGHTS AND IMPORTANT INFORMATION

12.1 CHANGES TO OUR PRIVACY POLICY AND PRACTICES

This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Services after the updated Privacy Policy is posted on the Services. If at any point you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the Services.

- **Revision to the Privacy Policy.** We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to visit this Site and use the Services made available to you after such changes have been made, you hereby provide your consent to the changes.
- **Posting of Revised Privacy Policy.** If there are any material changes to this Privacy Policy, Arcturus will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned

about how your information is used, bookmark this page and read this Privacy Policy periodically.

- **New Uses of Personal Information.** Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. Where consent of the Individual for the Processing of Personal Information is otherwise required by law or contract, we will endeavor to comply with the law or contract.

12.2 CALIFORNIA PRIVACY RIGHTS

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the Third-Parties to whom we have disclosed their Personal Information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those parties. Except as otherwise provided in this Privacy Policy, Arcturus does not share Personal Information with Third Parties for their own marketing purposes.

12.3 CONTACT US

If you would like to contact us about our privacy practices, or exercise any of your data subject rights, please send a written request to the data controller of your Personal Information or to Arcturus at cs@arcturus.io or 1st Floor, Buckhurst House, 42/44 Buckhurst Avenue, Sevenoaks, Kent, England, TN13 1LZ.