

GREENON – DATA PROTECTION & PRIVACY POLICY

1. Overview

GREENON, is built on the foundations of trust, integrity and partnership and as such is committed to respecting your privacy and protecting your personal data privacy.

2. Purpose

a. GreenON is a first-ever digital service that adopts an evidence-based, data-driven approach to monitor and analyse the initiatives of companies against their sustainability objectives, eventually enabling the collation, management and sharing of transparent, explainable and auditable data for sponsorship, financing and sustainability disclosures. (**GREENON, we, our** or **us**, as the case may be).

b. All personal data controlled by us is processed in accordance with this Data Protection & Privacy Policy (**Privacy Policy**).

c. By “personal data” we mean all information that relates to, identifies or may identify you.

d. We collect, store and use information in accordance with Singapore’s Personal Data Protection Act (PDPA) and any other relevant legislation and regulations as amended from time to time.

e. For the purposes of PDPA, we are the data controller (or, at times joint controller) of any personal data we hold or process about you.

f. This Privacy Policy applies to all personal data we gather or use in connection with your relationship with us whether that is as a client, partner, associate, member, founding member, adviser, customer or otherwise. This includes when you use our Website <https://greenon.io/>, services provided by us or others acting on our behalf, and whenever you interact with us (**our Websites**). We will only use your personal data in accordance with this Privacy Policy.

g. This Privacy Policy should be read together with other terms and conditions posted on our Websites, including our Terms and Conditions.

h. By engaging with us, using our services and our Websites, and by providing any personal data to us, you are consenting to our use of your personal data as set out in this Privacy Policy. For the sake of clarity, we would confirm that such consent does not allow us to undertake marketing communications without your separate and additional explicit consent. We have set this out in more detail at paragraph 8 below.

i. We may amend this Privacy Policy, and by using our services and our Websites, you are deemed to accept any such amendments to our Privacy Policy. Any changes will be shown updated here. You should read and review this page regularly to see if there have been any changes.

3. How we may collect and/or receive your personal data?

Your personal data is collected and/or received by us when you:

a. communicate with us by email, telephone, in writing, through our Websites or via social media;

b. provide it in or in connection with any contract commitment, proposal, pilot or similar document or arrangement;

c. fill in forms on our Websites, including any information you provide when you register, create or modify an online account with us;

d. use or access our Websites (and personal data here also includes, but is not limited to, traffic data and data in relation to the resources you access);

e. respond to surveys, questionnaires, polls or anything else you may be asked to complete.

We may also collect your personal data from publicly available information such as information on third party websites or from companies, partners, joint ventures, partnerships, entities, not-for-profit organisations or trusts with whom GREENON has some relationship or connection (together **Affiliates**).

4. What is personal data?

The types of personal data we receive, store and use may include:

a. data provided by you to verify your identity, including your title, name, gender, address, telephone numbers, passport details, National Insurance No., email address and date of birth;

b. your account or log-in information (including your username and password);

c. information about your interactions that you may have with us and our employees, including interactions via email, telephone or through our Websites;

d. information regarding your personal or professional interests, employment status, demographics, experiences with our services, and any contact preferences;

e. all data generated through your interaction with us and our professional advisors.

5. Changes in your personal data

a. In order to ensure our records are accurate and updated we may make periodic requests for you to confirm any or all of the relevant data items that we hold.

b. We would ask that where you are aware of a material change in your own data set e.g. change of address, name, contact number, email address or anything similar, you notify us in a timely fashion via enquiry@fundon.io. We may ask for documentary evidence to verify the new data.

6. How we use personal data

We use the personal data we collect and receive to help us understand your needs and to help us provide you with a better service. In particular, we (including third party data processors, agents and subcontractors acting on our behalf) collect, store and process your personal data for the following reasons:

a. to allow you to use the various features of our Websites and all and any products hosted on them;

b. to provide our products and services to you in connection with our legitimate business interests;

c. for purposes related to providing our products and services to you, including verifying and authenticating your identity, processing your payments, completing transactions and processing your purchasing requests;

d. to improve and tailor our products and services and train our employees;

e. for our own internal record-keeping requirements;

f. to help protect your account and prevent unauthorised access to your account;

- g. to meet our regulatory obligations;
- h. to assist in the detection, prevention of fraud and financial crime;
- i. for market research, analysis, testing, monitoring, risk management, audit and administrative purposes;
- j. to contact you, e.g. to send service communications through our Websites, email or any other medium so as to notify you of material information relevant to our legitimate business interest; and
- k. where you have provided your explicit consent for us to do so, for marketing purposes, such as sending you email newsletters with our and our Affiliates' latest offers, information, promotions or products and services or other information we think you may find interesting or for customer satisfaction purposes in accordance with this Privacy Policy.

7. Do we share personal data with anyone else?

We may disclose personal data we collect or receive:

- a. to you, your advisers or those we reasonably believe to be acting on your behalf;
- b. to our Affiliates for the purposes described in this Privacy Policy and always in accordance with the terms of this Privacy Policy;
- c. to third parties to provide a service to, or perform a function for us, or you, or who are otherwise appointed by us in connection with the services we offer you including those who are acting as our agent or sub-contractor, including, without limitation, data processing service providers executing brokers, custodians and our legal and professional advisors;
- d. to third parties in connection with a proposed or actual financing, securitization, insuring, merger, restructure, sale, acquisition, assignment or other disposal of all or any part of our business or assets or the assets of any Affiliate or to anyone whom we may transfer our rights and/or obligations for the purposes of evaluating / performing the proposed transaction; and
- e. to any entity to whom we are required by any applicable law, regulation or legal process, to disclose the data. We would advise that on such occasions we may be restricted by law from notifying you of such disclosure.

However, we never store or disclose your financial account log-in information (such as your username and passwords) to anyone. Furthermore, we will never ask you for your username, passwords or such information. Please contact us directly at enquiry@fundon.io if you have concerns about being asked to provide this information.

8. Marketing Communications

a. Only when you have provided your express consent, we will send you marketing communications electronically (e-mail or text). Such communications may relate to goods, products, services or opportunities which are in our legitimate business interest and substantively similar to those that you have previously purchased, invested or expressed an interest in or if you have expressly consented to us contacting you in this way.

Please do not provide us with such consent if you do not want that information to be used by us in this manner.

b. You will always be asked whether you wish to provide your consent to receive marketing communications from us and/or third parties. You can change your marketing preferences at any time by contacting us at enquiry@fundon.io.

9. Statistical information

We may aggregate information about you with information about other users of our Websites or services to create anonymised statistical data about users. This is statistical data that does not identify you nor contain any of your personal data. We may distribute any such aggregate information to third parties we work with in the legitimate interests of the business.

10. Third party links

Our Websites may contain links to enable you to visit third-party websites, mobile sites and mobile applications. Please note that while we try to work with reputable parties, we do not have any control over their third-party websites, mobile sites or mobile applications.

Therefore, we are not responsible for the protection and privacy of any information that you provide whilst visiting such sites. Such sites are governed by their own privacy policies and not this Privacy Policy. We would therefore strongly recommend that if you have any concerns you should review their relevant Privacy / Data protection policy prior to providing them with any personal data.

11. Data storage

a. Personal data we collect from you may be transferred to and stored in destinations outside Singapore ("Host Country") and may be subject to be processed by staff operating outside the Host Country to the extent that is reasonably necessary to provide our services to you.

b. We will take reasonable and appropriate steps to ensure that any of your personal data transferred outside the Host Country will be treated securely and be protected to a standard comparable to the protection in accordance with our PDPA obligations and this Privacy Policy.

c. By using our services and or Websites, and by submitting your personal data to us, you agree that your personal data may be transferred, stored and processed outside of the Host Country.

d. We will take steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. You should be aware that transmission of information via the internet is not entirely secure and we cannot guarantee the security of any data you transmit to our Websites via the internet or any other means.

e. We will retain your personal data and other information which we have collected or received to the extent required by applicable laws and as we may require for operational and legal purposes.

12. Access to information

a. You have a right under PDPA to access information we hold about you by contacting us at enquiry@fundon.io. Please include your name and address and any other information which may identify you. We will not charge you for any reasonable and or periodic requests to access this information.

b. You will have the right to instruct us to move, copy or transfer your personal data from one IT environment to another in a safe and secure way, without any hindrance to usability. Where you request a transfer of your data, we reserve the right to maintain a copy in line with our regulatory and statutory obligations. In addition, we may redact or remove any proprietary information relating to the activities of our firm or its affiliates.

13. Right to have your data deleted

You have the right to ask us to delete your personal data without undue delay and we shall comply where one of the following grounds applies:

- a. Your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- b. There is no other legal ground for us processing;
- c. Your personal data has been unlawfully processed; or
- d. Your personal data must be erased for compliance with a legal obligation (note we will require written evidence of such legal obligation).

If you require further information, please email us at enquiry@fundon.io.

14. Cookies

Cookies are small files placed on your device when you visit our Websites. We use cookies to recognise you and your preferences, improve the performance of our Websites and to create statistical data.

Cookies generally fall into one of the following categories:

- a. strictly necessary cookies which are cookies that are required to allow you to use our Websites and its features;
- b. performance cookies which recognise and collect information about how visitors use our Websites to create aggregated, anonymous information that does not identify the visitor;
- c. functionality cookies which allow our Websites to remember you and provide a more personalised service to you;
- d. targeting or advertising cookies which are used to deliver adverts relevant to you;

Our Websites uses the following types of cookies: strictly necessary cookies, performance cookies, functionality cookies and those, where you have provided explicit consent, targeting or advertising cookies. Some of our cookies may remain on your device between your browsing sessions.

You can disable our cookies by changing the settings on your browser but doing so might mean you are unable to use certain features of our Websites.

15. Contacting us

If you have any questions or comments on this policy or you would like to request a copy of your personal data, you can contact us at enquiry@fundon.io.