

Privacy Policy

Updated March 2, 2022

Introduction

Angara Industries Ltd. incorporated in accordance with the laws of the United Kingdom and its subsidiary **Angara DX B.V.** incorporated in accordance with the laws of the Netherlands ("**Angara Group**", we or us) collect and process personal information provided to us from, or that we obtain on behalf of, our clients in the course of providing services to our clients.

This Policy is created in accordance with applicable privacy laws including, but not limited to, laws implementing the General Data Protection Regulation 2016/679 ("**GDPR**") and the UK Data Protection Act 2018 ("**DPA 2018**") (collectively, the "**Data Privacy Laws**"). It applies only to former, current and prospective clients (clients) of our European offices and clients of our non-European offices who are resident in the European Economic Area, Switzerland, and the United Kingdom (UK), and whose personal data we process on our clients' behalf and to all users of our Site.

Scope

This Privacy Policy ("**Policy**") describes how we process personal data we collect from individuals in relation to their use of our websites, ordering and use of our services and attendance at our events (collectively, our "**Services**"). In legal terms, we are the data controller, as we determine the means and/or purposes of the processing.

This Policy only covers data processing carried out by us. The Policy does not address, and we are not responsible for, the privacy practices of any third parties, also in cases where Services include hyperlinks to third parties' websites or when cookies are set by third parties.

The Policy applies to us, to our affiliates, to our directors, officers and employees, and to all persons who establish relations with us.

The Policy is also applicable to the processing of personal data through the website owned and/or operationally managed by us, namely: www.Decarbonix.tech The website www.Decarbonix.tech and other websites corresponding to the indicated domain names, as subsequently modified or supplemented, will be hereinafter individually referred to as the "**Site**".

The information we collect

Angara Group may collect and/or track (a) the home server domain names, e-mail addresses, type of computer, and type of a web browser of users to the Site, (b) the e-mail addresses of users that communicate with Angara Group or the Site via e-mail, (c) information knowingly

provided by the user in online forms, registration forms, surveys, etc. (including name, e-mail, region, company name and other personal profile data), and (d) aggregate and user-specific information on which pages users access.

The personal data Angara Group processes primarily includes contact details of our clients and their employees and their other personnel, along with any other data relating to such individuals in which they are identified or from which they are identifiable. This includes each individual's name, contact information and other information only to the extent provided to us by a client or its employees or other personnel.

Angara Group collects various types of personal data from different sources, including from:

- our clients / Site users;
- public sources, such as the internet and social media sites; and
- any vendors engaged by us or our clients to provide services on our or our client's behalf.

Cookies

You should also be aware that we use cookies to distinguish you from other users of our Site and Service and to keep track of your visits. They help us to provide you with the very best experience when you browse our Site and to make improvements to our Site. They also help us and our advertising networks to make advertising relevant to you and your interests. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Site may become inaccessible or not function properly. For detailed information on the cookies which we and our third-party providers use and the reasons why we use them, please refer to our Cookie Policy.

How we use the information

We gather information to allow us to process your registration and deliver you the service you require. The relevant information is then used by us, our agents, and sub-contractors to provide you with statements of your account and to communicate with you on any matter relating to the provision of your service in general. In this regard, we use your information for contractual reasons (and pre-contractual steps) and also for our legitimate interests in maintaining the Site and our business interests.

The personal data Angara Group collects is used in connection with, and to provide Services to, our clients—notably, to facilitate our provision of such services, to respond to queries, and for other professional dealings with our clients. The collection of such personal data may be a statutory requirement for providing Services, e.g. for conflict check purposes or to comply with anti-money laundering laws, and we will not be able to provide Services without the required personal data in such cases. Where and to the extent required by a court order or a request from a governmental or regulatory authority, Angara Group may also disclose this personal data to the court or governmental or regulatory authority.

We are also permitted to process this personal data to comply with our legal and regulatory obligations and/or our contractual obligations to our clients to provide the services to them

and for our own legitimate interests. Some of this personal data is processed by us outside Europe or UK and is held on servers within the local office of the particular country. Angara Group takes steps to safeguard the privacy and security of all categories of personal data as required under the Data Privacy Laws.

Disclosure of information to third parties

We will not, without your consent, disclose to third parties any individually identifying information, such as names, postal and e-mail addresses, telephone numbers, and other personal information which users voluntarily provide to Angara Group unless we have a Data Transfer Agreement in place with such third party or otherwise in accordance with the GDPR requirements.

However, we may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

The following are instances when we may disclose this personal data to other parties:

- To comply with the law or respond to compulsory legal processes (such as a search warrant or court order), or in response to a request for information from a regulator or governmental authority, or in the course of actual or anticipated litigation or otherwise for legal purposes, e.g. to other law firms, courts, or government authorities to protect our clients' rights and/or to provide services to our clients; and/or
- To protect the rights, property, or safety of Angara Group, or any of our respective affiliates, business partners, or clients, or otherwise in the legitimate business interests of Angara Group and/or our affiliates and in accordance with Data Privacy Laws; and/or
- With other law firms, courts, and governmental authorities, to protect the legal rights of our clients, or in accordance with litigation processes, and to provide our services under the agreements with our clients. We may share this personal data with another business entity in connection with the sale, assignment, merger, or other transfer of all or a portion of Angara Group's business to that business entity. We will require that such recipients undertake to protect this personal data as required by the Data Privacy Laws.

We may also, with your prior consent or otherwise in our or your legitimate interests namely where we consider the information to be helpful for your business, wish to provide you with:

- information about special features of our website or any other information or services that we think may be of interest to you; and
- related information with third parties we think may be of interest to you.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing or other similar purposes, please send us an email (see "How to contact us" section).

How we protect personal data

Angara Group understands that storing personal data in a secure manner is an essential requirement of the Data Privacy Laws and, therefore, employs reasonable physical, technical, and administrative safeguards to secure such data against foreseeable risks, including unauthorized use, access, disclosure, destruction, or modification. More specifically, our information security team has developed policies, standards, and procedures to support and enforce preventive and detective operational controls to ensure the confidentiality, integrity, and availability of Angara Group's client data. We utilize preventive and detective controls to safeguard our clients' data.

Although we make good-faith efforts to store the information we receive from and on behalf of our clients in a secure operating environment that is not available to the public, Angara Group cannot guarantee complete security. Further, while we work to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information.

Retention of information

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements including the statute of limitations periods.

International transfers of your information

Owing to the global nature of the Internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area (EEA) that do not have similar protections in place regarding your data and its use as set out in this policy. By submitting your information, you acknowledge these transfers. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Angara Group enters into Data Transfer Agreements with its non-EEA offices and also with third party recipients of information which are located outside of the EEA or otherwise makes the transfers in accordance with the GDPR requirements. A copy of the form of European Data Transfer Agreements which are in the form approved by the European Commission is available at:

<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32004D0915;>

[http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32010D0087.](http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32010D0087)

Unfortunately, the transmission of information via the internet is not completely secure. However we have put in place various security procedures as set out in this policy. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your

information, we will use strict procedures and security features to try to prevent unauthorized access.

Changes

We may amend this Privacy Policy from time to time in order that it accurately reflects the regulatory environment and our own data collection and disclosure practices. Accordingly you should review this policy periodically. When we change this Privacy Policy in a material way, we will update the “last modified” date at the top of this Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

How to contact us

Individuals have the right to access their personal information and to ensure that it is accurate, and to request that we delete and/or restrict the processing of their personal information in accordance with, and subject to, the Data Privacy Laws.

If you have any questions or concerns about the privacy policy for Angara Group or its implementation, or if at any time you decide that we should no longer hold any of your personal data, or wish to change the use to which any such data can be put, please let us know by emailing us at info@angaraglobal.com . You have the right to review the personal information that we keep about you. You can send a request to receive an overview of your personal data by emailing us at info@angaraglobal.com . To expedite handling please use the subject line “Requesting personal information”. If your data is inaccurate or if you believe we are no longer entitled to use your personal data or have questions on how your data is used, please contact us at info@angaraglobal.com . You have the right to request that your personal information be removed from our systems by contacting us at info@angaraglobal.com using the subject line “Requesting account deletion”. We will be in touch with you to discuss any data retention for compliance with legal regulations and set a date for removal of your data. The processing of your personal data is controlled by Angara Group. In using our websites and/or applications, you consent to the collection and use of this information by Angara Group in the ways described above.