

CO2 AI PRODUCT ECOSYSTEM PRIVACY POLICY

Last update: 14 April 2023

CO2 AI is committed to transparent data protection practices in accordance with the following principles and in compliance with applicable data protection laws, in particular the EU General Data Protection Regulation.

In this Privacy Policy, we explain how we collect, use, and share your personal information when you use CO2 AI Product Ecosystem Platform (the “**Platform**”).

1. Data controller

CO2 AI, a French simplified joint-stock company (SAS) registered under number 949 056 766 RCS Nanterre, with its registered office at 14 rue Beffroy, 92200 Neuilly-sur-Seine, France (“CO2 AI” or “we”), is the controller of your personal data.

2. What data do we collect about you?

We collect the following personal data:

- **Registration information:** you are required to provide certain information (such as your name and professional email address) to create a user account on the Platform. If you do not fill in the required fields, you will not be able to create an account and access the Platform.
- **Data we automatically collect:** when you use the Platform, data is automatically recorded via your browsing traces either directly through server event logs (log files) or indirectly through third-party cookies or. This is your browsing data. This data includes data relating to your connection to the website (IP address, date and time of connection, search engine used, etc.) and data relating to the equipment you are using (type of equipment, operating system and settings).
- **Data collected indirectly:** when another user of the Platform wishes to invite you to use it, the user fills in the information necessary to send you an invitation to create your own account.

If you provide CO2 AI with personal data about other individuals, it is your responsibility to inform them of their rights relating to the processing of their personal data for these purposes. You are also responsible for obtaining the explicit consent of these individuals (unless you can provide such consent on their behalf) to the processing of their personal data for the purposes set out in this Privacy Policy.

The Platform and our services are not designed for or intended for minors. We do not knowingly solicit or collect personal data from minors. Persons under the age of 18 may not do business with CO2 AI. If we discover that we have collected information from a minor, we will delete it. Please contact us at the contact information indicated in Section **Erreur ! Source du renvoi introuvable.** below if you believe you have provided us with information about a minor.

3. Why do we process your personal data?

We only process your personal data where we have a lawful basis to do so, for the following purposes:

- Processing necessary for our legitimate interests:
 - Provision and improvement of our Platform and services, and maintaining a secure environment
 - Management of the commercial relationship with the entities using our Platform (the “Participants”)
 - Fulfillment of contracts with the Participants of the Platform: provision of subscribed services, compliance with contractual obligations

- Sending marketing communications to existing and prospective Participants to promote and develop CO2 AI's activities
 - To compile business statistics, after having made your data anonymous or in any case after having implemented processes intended to prevent your re-identification
 - To defend our interests in the event of litigation or legal action
- Processing necessary to comply with our legal obligations: some of your data is also processed to comply with our legal obligations and to defend our interests in the event of litigation or legal action.

4. How long will your personal data be processed?

We keep your personal data for the time strictly necessary for the purposes set out herein and in accordance with applicable regulations. In particular:

- Data associated with the use of the Platform: we process your account data for as long as you are a user of the Platform.
- E-marketing options: we send marketing communications to the existing Participants of the Platform until they unsubscribe by using the unsubscribe link provided in the communications. We delete the data of the potential Participants 3 years after the last interaction (click) with a marketing email or an invitation to use the Platform sent by another Participant.

Please note that your data may be retained for longer periods of time, for example to establish proof of a right or to comply with a legal obligation. In any case, your data is not kept beyond what is strictly necessary for the purposes for which it is processed. When your data is no longer required, we will ensure that it is deleted or anonymized.

5. Where is your personal data processed?

Your processed personal data is hosted in the European Union.

6. With whom do we share your personal data?

We share your personal data only with:

- our duly authorized personnel, who need access to your data in the course of their duties in connection with the purposes described above;
- our service providers who act as data processors;
- our external advisors (lawyers, auditors, etc.), when necessary for our legitimate interests;
- public or judicial authorities, when we are legally obliged to do so or to protect our rights or the rights of third parties; and
- other Participants you have authorized to access, view and use your data via the Platform.

We may also share your personal data with third parties in connection with a potential or actual sale or restructuring of our company or certain of our assets, in which case your data may be part of the transferred assets.

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties where justified by our legitimate interest, permitted by applicable law, or necessary for compliance with a legal obligation to which we are subject.

In this context, your personal data may be transferred outside the European Economic Area (EEA), to countries not offering a level of protection of personal data equivalent to that offered within the EEA, such as the US. In the absence of an adequacy decision of the European Commission, the transfer of your personal data will be made pursuant to standard contractual clauses adopted by the European Commission, as appropriate. You can obtain a copy of the relevant safeguard by contacting us at the

contact details set out in Section 8 "Contact", although some details may be redacted for confidentiality reasons.

7. What are your rights?

In accordance with applicable data protection laws, you have the right to:

- withdraw your consent to any processing of your data based on your consent at any time;
- ask us to confirm whether we are processing your data and, if so, to inform you of the characteristics of the processing, allow you to access it and obtain a copy;
- ask us to correct or complete your data if it is incorrect or incomplete;
- ask us to delete your data or to limit the processing;
- ask us to provide you with your data in a structured, commonly used and machine-readable format, or you can request that it be transmitted directly to another controller;
- set out instructions (general or specific) as to what happens to your data after your death;
- **object to any processing of your data that is based on our "legitimate interest". If you exercise this right, we must cease processing unless we demonstrate imperative and legitimate grounds that override your fundamental rights and freedoms, or for the establishment, exercise or defense of legal claims; and**
- **object at any time to the processing of your data for commercial prospection purposes.**

You can exercise your rights by contacting us at the email address indicated in in Section 8 "Contact".

You also have the right to lodge a complaint with the competent supervisory authority regarding the processing of your data. In France, the supervisory authority for the protection of personal data is the CNIL (www.cnil.fr).

8. Contact

If you have further questions on the topic of data protection, or if you want to exercise your data protection rights, please contact us at support@co2ai.com.

9. Updating the Privacy policy

We may amend this Privacy Policy from time to time, in particular to comply with any legislative or regulatory, case law, editorial or technical developments. We will notify you in the event of a material change.