

PRIVACY POLICY

InClime, Inc. (hereinafter, “we,” “us,” “our”) takes your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information, which is any information relating to an identified or identifiable individual. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws in the United States, and we are responsible as “controller” of that personal information for the purposes of those laws.

- 1. Personal Information We Collect About You. We may collect and use the following personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:**

Categories of Personal Information
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, or other similar identifiers)
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, driver’s license or state identification card number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.
Characteristics of protected classifications under California or federal law.
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories)
Biometric information
Internet or other electronic network activity information (e.g., information regarding a consumer’s interaction with InClime or InClime client’s Web sites and applications, Internet Protocol (IP) address)
Geolocation data
Audio, electronic, visual, thermal, olfactory, or similar information
Professional or employment-related information



Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)

This personal information is required to provide our services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing these services to you.

2. How Your Personal Information is Collected. We collect most of this personal information directly from you—in person, by telephone, email and/or via our website. However, we may also collect information:

- From publicly accessible sources (e.g., property records);
- Directly from a third party (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
- From a third party with your consent (e.g., your bank);
- From cookies on our website; and
- Via our IT systems, including:
 - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, renewable energy monitoring systems, email and instant messaging systems.

3. How and Why We Use Your Personal Information. Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.



The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide our services to you	For the performance of our services to you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or the client who hired us for services.	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, inquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations



Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e., to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks	For our legitimate interests or those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations



The above table does not apply to special category personal information, which we will only process with your explicit consent.

4. Who We Share Your Personal Information With. We routinely share personal information with:

- Our affiliates, including companies within the InClima group;
- Service providers we use to help deliver our services to you, such as payment service providers, warehouses and delivery companies;
- Other third parties we use to help us run our business, such as government agencies, contractors, or website hosts;
- Third parties approved by you, including third-party payment providers;
- Credit reporting agencies;
- Our insurers and brokers;
- Our bank[s];

We allow our service providers to handle your personal information only if we are satisfied that they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

5. Personal Information We May Have Disclosed for a Business Purpose. In the preceding 12 months, we may have disclosed for a business purpose to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone



number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information;

- Characteristics of protected classifications under California or federal law;
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Internet or other electronic network activity information (e.g., information regarding a consumer's interaction with an InClima or InClima client's Web site or application portal, and Internet Protocol (IP) address);
- Geolocation data;
- Audio, electronic, visual, thermal, olfactory, or similar information;
- Professional or employment-related information;
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA); and

6. Where Your Personal Information is Held. Information may be held at our offices and those of our subsidiaries, third party agencies, service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information with").

7. How Long Your Personal Information Will Be Kept. We will keep your personal information while you have an account with us or while we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly
- To keep records required by InClima's or an InClima client's record retention policy; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information and for different client contracts.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

8. Your Rights Under the CCPA. As a California citizen, you have the rights under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:



<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you; • The categories of sources from which the personal information is collected; • Our business or commercial purpose for collecting or selling personal information; • The categories of third parties with whom we share personal information, if any; and • The specific pieces of personal information we have collected about you. • Please note that we are not required to: • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or • Provide the personal information to you more than twice in a 12-month period.
<p>Personal Information Sold or Used for a Business Purpose</p>	<p>In connection with any personal information we may disclose to a third party for a business purpose, you have the right to know:</p> <p>The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and</p>



	The categories of personal information that we disclosed about you for a business purpose.
Right to Deletion	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records. • Please note that we may not delete your personal information if it is necessary to: <ul style="list-style-type: none"> ○ Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us; ○ Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; ○ Debug to identify and repair errors that impair existing intended functionality; ○ Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;



	<ul style="list-style-type: none"> ○ Comply with the California Electronic Communications Privacy Act; ○ Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; ○ Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; ○ Comply with an existing contractual or legal obligation; or ○ Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Protection Against Discrimination	<p>You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or</p>



	quality of services to you, if that difference is reasonably related to the value provided to our business by your personal information.
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9. Keeping Your Personal Information Secure. We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

10. How to Exercise Your Rights. If you would like to exercise any of your rights as described in this Privacy Policy or to update or correct your personal information, please:

- Call us, toll-free, at 410-231-3996; or
- Email/write to us at privacy@inclimesolutions.com or 326 First Street, Suite 27, Annapolis, MD 21403.

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by website, email, phone or in writing, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and application number if applicable);
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

11. Changes to This Privacy Notice. This privacy notice was published on 09/01/2022 and last updated on 09/01/2022.

12. How to Contact Us. Please contact us by email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are:



InClime, Inc.
326 First Street, Suite 27 Annapolis, MD 21403
customerservice@inclimesolutions.com
Phone: 410-231-3996

13. Do You Need Extra Help? If you would like this notice in another format (for example: large print) please contact us (see “How to contact us” above).

