



ORMEX

PERSONAL DATA PROTECTION POLICY



ORMEX

18 bis, rue d'Anjou 75008 Paris, France

SAS, RCS BOBIGNY: 888 173 218

TVA number: FR88888173218

contact@ormex.org – www.ormex.io

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INTRODUCTION

Privacy policy of the service accessible via web-application through the website "www.ormex.app" (hereinafter referred as the "Site"), published by ORMEX, a simplified joint-stock company, registered with the Paris Trade and Companies Register under number 888 173 218, 21 rue Albert Camus 93400 Saint-Ouen-sur-Seine, France.

ORMEX is a recognized global standard in the voluntary carbon market involved in the certification of projects that through the implementation of regenerative practices in the agricultural sector, aim to support the reduction of emissions and the sequestration of greenhouse gases and contribute to the improvement of sustainable development objectives.

As part of this activity, ORMEX has developed a digital platform accessible at the www.ormex.app address (hereinafter referred to as the "ORMEX REGISTRY PLATFORM" or the "Site") providing technical tools for the management of Carbon Credits within the framework of the Voluntary Carbon Market.

This privacy policy (the "Privacy Policy") sets out the practices for collecting, processing and sharing Personal Data in the context of the services provided by ORMEX to Users.

The Privacy Policy may be modified at any time by ORMEX, in particular in order to comply with any changes in the applicable regulations. ORMEX will inform users of the services accessible on the Site in the event of any changes.

ARTICLE 1. DEFINITION

The terms listed below have the following definitions:

term	Definition
Personal Data:	Means any information likely to directly or indirectly identify a natural person within the meaning of Regulation (EU) 2016/679 known as the General Data Protection Regulation ("GDPR"), the national laws implementing the said Regulation and any other applicable regulations on the protection of Personal Data and privacy (hereinafter, together, the "Regulations")
Personal space	Refers to the interface through which the User accesses ORMEX services, after registering on the Site.
Data Controller	Refers to the legal entity which, alone or jointly with others, determines the purposes and means of the processing.
Treatment	Means any operation or set of operations involving Personal Data, regardless of the method used, including recording, organizing, storing, modifying, transmitting or communicating Personal Data, among other activities.
User	Refers to any person accessing the web-application via the Site, with a view to registering on the digital platform made available by ORMEX under the conditions established by the general terms and conditions of use and the general terms and conditions of sale accessible on www.ormex.app

ARTICLE 2. IDENTITY OF THE DATA CONTROLLER

Personal Data is collected and processed by ORMEX, in its capacity as data controller.

ORMEX (SAS)

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93400 Saint-Ouen-sur-Seine.

Registered with the Bobigny Trade and Companies Register n° 888 173 218

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ARTICLE 3. COLLECTION OF PERSONAL DATA

ORMEX may collect the Personal Data of any Internet user accessing the Site, and in particular the data provided by the Internet user when creating a user account, which can only be used after acceptance of the Privacy Policy.

ORMEX collects information provided by the user, including:

- ✓ Identification data: Title, surname, first name, position, profession, date of birth,
- ✓ Contact data: E-mail address, telephone, login details,
- ✓ Location data: Postal address.

This data undergoes automated processing, it being specified that if the required information is not provided, no contract can be finalized, and the User will be unable to access the services offered by ORMEX.

Furthermore, ORMEX does not automatically collect Personal Data such as information about the device used, the browser, the IP address.

It is specified that ORMEX does not register any Personal Data on the shared electronic recording device (blockchain technology) used in its services.

ARTICLE 4. PURPOSE, LEGAL BASIS AND RETENTION PERIOD

The Personal Data collected when accessing and registering on the Site is collected for the purpose of contract formation and, if applicable, its execution under the conditions defined below.

ORMEX only collects and processes Personal Data when there is a legal basis for its collection and use in accordance with current regulations, particularly in the following cases:

- ✓ when the concerned individual has given free, specific and informed consent regarding the Processing;
- ✓ where it is necessary for the execution of a contract or within the framework of commercial relations;
- ✓ where it is necessary to comply with legal or regulatory obligations;
- ✓ where justified by ORMEX's legitimate interests.

With regard to the above-mentioned legal bases, ORMEX processes Personal Data for the following purposes:

Purpose	Legal basis for processing
Data processing for research and development purposes (analysis of the use of the ORMEX platform – Cookies – Audience measurement)	Legitimate Interests
Information on the relevance of the operation of the ORMEX platform and improvement of the user experience	Legitimate Interests
Access to and use of the site and its features	Legitimate Interests and Execution of Contract, Consent
Creating and managing user accounts	Legitimate Interests, Execution of Contract and Consent
Validation of projects registered on the platform	Legitimate Interests, Execution of Contract, Consent
Communication between Users and ORMEX teams	Legitimate Interests, Execution of Contract, Consent
Connecting Users with independent auditors	Legitimate Interests, Execution of Contract and Consent
Promotional literature about new offers, features, or updates	Legitimate interest and consent
Information on Functional Changes and Updates	Legitimate Interests and Execution of Contract
Invoicing, accounting and management of unpaid invoices	Legitimate Interests, Contractual Execution and Legal Obligations
Claims Management	Legitimate Interests and Execution of Contract
Information in the event of a reorganization of the activity or the company (sale, cessation, modification, etc.), transmission of Personal Data in the event of a sale of the company to a third party.	Legitimate Interests

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The Personal Data collected for the purposes detailed above are actively stored for the duration of the contract established with the User, and in an intermediate archive for the legal prescription period for litigation, particularly to establish evidence of a right or the existence of a contract, or under a legal obligation as imposed by the provisions of the French Civil Code and the French Commercial Code. Notably, invoices are retained for 10 years from the date of issuance.

It is specified that if ORMEX does not validate the creation of the user account, especially if it does not meet the conditions required and established by the general terms and conditions, or if the user does not complete the registration process, ORMEX will proceed to delete its Personal Data within a period of one (1) month.

ARTICLE 5. DATA RECIPIENTS AND SUBCONTRACTORS

The Personal Data collected on the Site are intended for ORMEX and any potential service providers responsible for carrying out Processing operations on behalf of ORMEX.

If the missions of third parties involve the transmission of Personal Data, ORMEX requires that such third party process such Data in accordance with the Privacy Policy. ORMEX is committed to ensuring the confidentiality and security of this Data.

Thus, ORMEX may use subcontractors to offer its services, including third-party technical service providers, and to transfer or grant them access to Personal Data. For this purpose, ORMEX implements appropriate guarantees to ensure compliance with the protection of Personal Data.

Any agreement with subcontractors must include obligations that are no less protective than those of the Privacy Policy. Where a subcontractor fails to fulfil its obligations under any subcontracting agreement or any applicable data protection legislation, ORMEX remains solely responsible to the concerned Client for the performance of its obligations under the Contract.

Some of ORMEX's subcontractors may operate in countries outside the European Union. Client data may be transferred to countries providing adequate protection in accordance with current regulations, ensuring a sufficient level of protection of Personal Data.

In other cases, the transfer of personal data will be carried out through legal tools such as the Standard Contractual Clauses published by the European Commission and recognized as a guarantee of the protection of Personal Data.

In certain circumstances, ORMEX may be required by law to disclose Personal Data to third parties, such as public bodies or judicial authorities.

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ARTICLE 6. OBLIGATIONS OF THE DATA CONTROLLER

ORMEX takes the utmost care to protect the personal data related to the account of registered User or one in the process of registering.

Thus, when ORMEX processes Personal Data in the pre-contractual context, or in the context of the execution of the contract, ORMEX must:

- ✓ Process Personal Data in accordance with the User's instructions and ORMEX's Legitimate Interests;
- ✓ Implement appropriate technical, material and organizational measures to protect against destruction, loss, alteration, unauthorized disclosure or unauthorized access to Personal Data processed in connection with the use of the Site;
- ✓ Ensure that staff who need access to Personal Data have committed to confidentiality or are subject to an appropriate legal obligation of confidentiality.

If ORMEX becomes aware of any accidental, unauthorized, or unlawful destruction, loss, alteration, disclosure or access to the personal data that ORMEX processes for the User, ORMEX will immediately inform the User.

ARTICLE 7. RECORDS OF PROCESSING ACTIVITIES

Within the context of ORMEX's contractual relations with its clients, ORMEX must maintain a record of the processing activities carried out on behalf of the Client, including those entrusted to its own personal data subcontractors with the consent of the clients. This register should indicate, for both ORMEX and on behalf of the Client, the location where the services are performed and the transfers of the client's Personal Data outside the European Economic Area (EEA) and/or outside the country in which the User is established.

The register maintained by ORMEX must also include information, if necessary, on the implementation of appropriate protective measures to ensure an adequate level of protection, as well as any other information required by the regulations.

ARTICLE 8. EXERCISING OF RIGHTS

In accordance with regulations, any person has the right to access, rectify, transfer, and delete their data, as well as the right to object and the right to limit the processing of their data.

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Users thus has the following rights:

➤ **Right to information about the processing of Personal Data;**

ORMEX will endeavour to provide concise, transparent, comprehensible and easily accessible information in clear and simple terms, on the terms and conditions of the Processing.

➤ **Right of access, rectification and right to erasure;**

The right of access allows obtaining from ORMEX information about the existence of a Processing, and, if applicable, on the conditions of this Processing, as well as to receive an electronic copy of it.

Users can also request the rectification of their Personal Data, which ORMEX undertakes to carry out as soon as possible following this request.

Finally, subject to the exceptions provided for by applicable law (e.g., necessary retention to comply with a legal obligation), Users can exercise their right to be forgotten when one of the following reasons applies:

- ✓ The Processing is no longer necessary in relation to the purposes for which the Personal Data was collected or otherwise processed;
- ✓ In case of withdrawal of the consent on which the Processing was based and to the extent that there is no other basis justifying the Processing;
- ✓ On the basis of a legal obligation.

➤ **Right to limit Processing**

The applicable regulations provide that this right may be invoked in certain cases, in particular where:

- ✓ The accuracy of the Personal Data is contested;
- ✓ The User is able to establish that the Processing is unlawful while objecting to the erasure of the Personal Data and instead demanding the limitation of the processing;
- ✓ When the User objects to Processing that would be based on the interest of ORMEX, during the verification of whether the legitimate grounds pursued by the Data Controller prevail over those of the data subject.

➤ **Right to portability of Personal Data**

When the processing is based on consent or a contract, the right to portability allows the User to receive the Personal Data provided in a structured, commonly used format and to

transmit such personal data to another Data Controller without hindrance from ORMEX, where technically feasible.

➤ **Right to withdraw consent**

When the basis for the Processing is consent, it may be withdrawn at any time by contacting ORMEX under the conditions specified below. In accordance with applicable law, the withdrawal of consent is only valid for the future and cannot affect the lawfulness of the processing carried out prior to such withdrawal.

The user also has the right to give instructions on the fate of their data after their death and to withdraw their consent at any time when processing is carried out on such a basis.

ARTICLE 9. CLAIM

For any request relating to the exercise of their rights, the User must provide ORMEX with the following information in order to verify your identity: [surname](#), [first name](#), [email address](#), [company details](#).

For any question, exercise of rights, or complaint concerning the protection of the User's Personal Data, the User may contact the following email address: contact@ormex.org

If ORMEX does not meet the User's request or if they believe their rights are not being respected, they can file a complaint with a personal data protection authority, namely the French National Commission for Informatics and Liberties (Commission nationale informatique et libertés – CNIL) in France.

DOCUMENT HISTORY

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