

Policy Number: LAW-POLY-005	POLICY TITLE: SINGAPORE WEBSITE DATA PRIVACY POLICY	Effective Date: 29-NOV-2021
Policy Owner: Chief Legal Officer		Revision Date: 15-OCT-2025

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DEFINITIONS

*This **Data Privacy Policy** ("Policy") is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of the Company or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.*

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INTRODUCTION:

Quantinum, a company incorporated under the laws of the Cayman Islands, and its subsidiaries (the “Company”, “Quantinum”, “our”, “us”, or “we”) is committed to safeguarding the privacy of Personal Data provided to it and in respect of any natural person(s), including but not limited to, clients, suppliers, partners and website visitors (“you” or “your”) in accordance with the EU General Data Protection Regulation (Regulation 2016/679) (“GDPR”), Singapore Personal Data Protection Act 2012 and any other applicable data privacy Laws. The Company is the data controller of any Personal Data provided to it when you visit or use any of our websites (the “Sites”) or use products or services that we offer.

In the process of providing services to clients, Quantinum may Process Personal Data as a data processor, meaning that we Process the data solely on the instructions of our clients, who determine the purpose and means of Processing and exercised overall control of the data. Therefore, if you have questions or wish to exercise your rights relating to your Personal Data, you may need to contact the client (and controller) on whose behalf the Processing of your data is carried out. If we receive a request from you relating to data controlled by a client, we will pass the request to the appropriate client (and controller) where permitted by applicable privacy Law.

PURPOSE:

This Quantinum Data Privacy Policy and Website Privacy Statement (the “Policy”) establishes uniform, global guidance regarding how the Company generally intends to Process and protect Personal Data. The Policy explains how we collect, share, and use Personal Data collected and how you can exercise your privacy rights. Note that, by using our Sites, you are consenting to Quantinum collecting and Processing your Personal Data in accordance with this Policy, as it may be amended from time to time. If you do not agree to these terms, do not use the Sites. Unless otherwise stated, this Policy should not be construed as a guarantee of action by the Company or as creating contractually binding promises. To the extent that Law or

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contractual provisions impose stricter requirements than the guidance set forth below, the Company will comply with the more restrictive Law or contractual provisions. Adherence to this Policy may be limited to the extent required to respond to legal, governmental or regulatory requirements, or where expressly permitted by Law.

This Policy does not replace or supersede any other privacy statement, privacy policy, or other notice or agreement addressing the Processing by the Company of Personal Data issued or otherwise made available to Data Subjects, but rather, shall be read in conjunction with such statements, policies, notices or agreements; provided, however, that in the event of a conflict between such statements, policies, notices or agreements and this Policy, the provisions of the former shall govern.

If you are a California resident, please see our CCPA/CPRA Privacy Notice below to learn about your rights under the California Consumer Privacy Act and California Privacy Rights Act.

If you are a Virginia resident, please see our Virginia Privacy Notice below to learn about your rights under the Virginia Consumer Data Privacy Act.

If you are a resident of the European Union or United Kingdom, then you have additional privacy rights which are explained below in the EU/UK Privacy Rights Notice.

If you are an individual in Singapore, you agree that, notwithstanding anything in this Policy and any clause which provides that this Policy is not intended to create contractual obligations, your use of the Sites and/or provision of Personal Data to us constitutes a legally binding promise and contractual obligation that you consent to the Company collecting, using, disclosing and/or processing your Personal Data in accordance with this Policy.

SCOPE OF POLICY

This Policy applies to the Processing of Personal Data of the Company's customers, suppliers and end users of Company's products and services worldwide in addition to users of the Sites.

APPLICABILITY:

LOCATION(S): ALL

BUSINESS UNIT(S): ALL

DISTINCTIONS: Applies to the Company, its operating units, direct and indirect subsidiaries and joint ventures where the Company has a controlling interest. This includes all Employees, sub-contractors, third party employees and Company resource and Sites users.

APPLICABLE LAW

The Company Processes Personal Data in compliance with Law, this Policy, contractual obligations and any privacy policy, privacy statement or other notice or agreement

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addressing Processing of Personal Data. The requirements in this Policy apply except where a particular jurisdiction's Law and/or contractual obligations impose more detailed or stricter requirements relating to the Processing of Personal Data, in which case that Law or those contractual obligations will apply and take precedence.

POLICY:

1. INFORMATION COLLECTION

1.1 GENERAL

The Company collects Personal Data for identified and appropriate business purposes, or as may otherwise be required or permitted by Law and does not Process Personal Data in ways that conflict with those purposes, unless otherwise required or permitted by Law.

1.2 COOKIES

The Company may also collect Personal Data automatically using cookies or other similar tracking technologies located on any Company website, application, software or similar electronic system Company-issued or Company-authorized. For more information about the cookies the Company uses, users should consult the Company's online Cookie Notice at www.quantinuum.com/cookie-notice. In order to receive further information about the cookies used in a particular Company electronic system, please contact compliance@quantinuum.com.

1.3 OUR COLLECTION OF PERSONAL DATA

Information collected directly from you. We may ask you for Personal Data to provide a service or carry out a transaction that you have requested. You may also provide Personal Data to us when you contact or engage with us (e.g., with a comment, inquiry or customer support request, site visitors) or register for an account to use our Sites. This Personal Data may include:

- Identity data, such as your name, title, company/organization name, e-mail address, telephone number and physical address (including street, city, state, postal or zip code, and/or country);
- Registration data, provided by you when you register for an account to use our Sites, including username and password;

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- Recruitment data, provided by you when you register for an account to use our Sites, including usernames and passwords;
- Business contact data, such as information related to other employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, non-profit, or government agency);
- Marketing and communications data, including your marketing preferences and your subscriptions to our publications;
- Financial information, including credit card or other financial account information for the purpose of enabling us to facilitate your purchase of Company products and services that may be available on our Sites or otherwise;
- Export control information, such as your nationality, citizenship, and country of residence, that allows us to determine your eligibility under export control regulations to receive information about certain technologies;
- Transaction data, including inquiries about our products and services and details of payments to and from you, including purchase order history and information needed to facilitate payment transactions;
- Event registration information, including information you provide when filing in e-registration forms; and
- Your feedback, including surveys, recommendations or other feedback from you about our Sites as well as our products and services generally.

If you do not provide the requested information, we may not be able to provide you with the requested service or complete your transaction.

Information we collect automatically about you. We collect certain information about your visit to our Sites using cookies and similar tracking technologies. We will respect any legal rights you may have to prevent us from doing this. Data collected in this way includes:

- Usage data, including information about how you use our Sites, what pages you view, the number of bytes transferred, the links you click, the materials you access, the date and time you access the Site, the website

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from which you linked to one of our Sites and other actions taken within the Sites; and

- Technical data, such as your Internet Protocol (IP) address, your browser type and capabilities and language and your operating system

For information about the cookies and other similar tracking technologies we use on our Sites, please refer to our Cookie Notice and the Cookie disclosure discussed above.

Geo-location information. For certain Sites, with your consent, we may collect the precise, real- time location (i.e., geo-location) of your mobile device. This information will be used only for the purpose of facilitating your use of the Sites including by our service providers who may Process this information in connection with providing services on our behalf. If given, you may adjust this consent by managing your Location Services preferences through the settings of your mobile device.

Information collected from third parties. In accordance with applicable Law, we may collect Personal Data about you from third parties, such as social media websites and applications and combine it with information we already hold, to help us improve and customize our Sites to your preferences and for other purposes set forth in this Policy. We may also collect your business contact information from your employer or other third parties to facilitate or otherwise engage in traditional business activities and similar administrative matters.

1.4 OUR USE OF INFORMATION

We may use the Personal Data via our Sites or when you contact us for purposes that include:

- **Business Contact Data.** Quantinuum collects and uses business contact data to engage in communications or transactions, including for conducting due diligence regarding, or providing or receiving, a product or service. For example, Quantinuum may collect and use this business contact data to facilitate and manage orders, contracts, warranties, maintenance, and similar business functions, for credit analysis and collection purposes, to assist with our own internal compliance and legal requirements, and (if necessary) to defend our interests and claims.
- **Services and transactions.** We may use your Personal Data to deliver services to you or carry out transactions you have requested,

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including, but not limited to, providing information on Company products or services you have purchased or otherwise use, registering purchased products, Processing product orders, handling warranty claims, replacing product manuals, answering customer service requests and facilitating the use of our Sites.

- **Administering and protecting our business and Sites.** We may use your Personal Data to administer and protect our business and our Sites, including troubleshooting, system maintenance, support, reporting and hosting of data.
- **Improving our business, Sites, products and services.** We may use your Personal Data to perform business analyses or for other purposes that help us to develop and improve the quality of our business, Sites, products and services (including new products and services), for example, by customizing our Sites to your particular preferences or interests.
- **Marketing.** In accordance with applicable Laws and regulations, we may, with your consent, use your Personal Data to inform you of products or services which may be of interest to you, and to otherwise communicate with you about offerings, events and news, surveys, special offers, and related topics. You can opt-out from marketing communications sent via e-mail at any time, free of charge by using the “unsubscribe” link in any e-mail marketing materials you receive from us, or by contacting us using the contact information listed in this Policy. Depending on your country of residence, you may also be able to opt out of other types of marketing communication; please contact us using the contact information listed below for more information. Some jurisdictions provide individuals (e.g., California residents) with the right to request certain information regarding our disclosure of Personal Data to third parties for the third party’s direct marketing purposes. For more information on our data disclosure practices for marketing purposes, please contact us in accordance with the instructions listed below.
- **Interest-Based Advertising.** We may collect data about your online activities and identify your interests so that we can provide advertising that is most relevant to you. You can opt-out of receiving interest-based advertising from Quantinuum as described in our [Cookie Notice](#).
- **Research and analysis.** We may use your Personal Data to conduct research and analysis to help us analyze your purchasing preferences, identify the products and services that best meet your requirements and

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measure the effectiveness of the advertising we serve you.

- **Legal Obligations and Enforcement:** We may use your Personal Data to comply with Laws and regulations or to fulfil a contract we have entered with you. We may use the Personal Data we collect to detect, prevent and respond to fraud, intellectual property infringement, violations of our terms and conditions, violations of Law or other misuse of our Sites.

Where permitted by Law, we may combine the information that we collect via our Sites with other information we hold about you (such as information about your use of our products and services) to offer you an improved and consistent customer experience when interacting with us or for other purposes set forth in this Policy.

LEGAL BASIS ON WHICH WE PROCESS INFORMATION

Where required by Law, we will ensure there is a legal basis for the Processing of your Personal Data. In most cases, our legal basis will depend on the Personal Data concerned, the specific context in which we collect it and the applicable data privacy Laws.

- **Contract:** the Processing is necessary for the performance of the services we provide to you, or to take steps (at your request) prior to, and anticipation of, performing, such services;
- **Legal obligation:** the Processing is necessary to comply with our legal obligations, including compliance with applicable Laws, regulations, governmental and quasi-governmental requests, court orders or subpoenas;
- **Consent:** the Processing is based on your consent to the processing of your Personal Data for one or more specified purposes (e.g., marketing);
- **Legitimate interests:** the Processing is necessary to meet our legitimate interests, for example to develop and improve our Sites, products and/or services for the benefit of our customers; or
- **Vital interests:** the Processing is necessary to protect your vital interests (for example, health and safety reasons if you attend a meeting at a Quantinuum location).

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Data, please send an

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email to compliance@quantinuum.com.

Anonymizing information

In accordance with applicable Law, we may anonymize your Personal Data so that it can no longer be used to identify you. Anonymized information is not considered Personal Data and is therefore not subject to this Policy. We may collect, use, aggregate and share anonymized information for any purpose.

How long we keep information

The period during which we store your Personal Data varies depending on the purpose of the Processing. For example, we store Personal Data needed to provide you with products and services, or to facilitate transactions you have requested, for so long as you are a customer of Quantinuum or if you submit an employment application via our Sites, we will retain details of your application as set forth in the privacy notice made available to you in connection with your application or as otherwise required by Law. In all other cases, we store your Personal Data for as long as is needed to fulfil the purposes outlined in this Policy, following which time it is either anonymized (where permitted by applicable Law), deleted or destroyed.

1.5 TRANSFERS OF DATA

Quantinuum is a global company, and your Personal Data may be transferred to, held, stored, or used across various locations worldwide as necessary for the uses stated above and in accordance with this Policy and in applicable Law. This means that when we collect your Personal Data it may be Processed in countries that may have data protection Laws that are different to the Laws of your country.

However, Quantinuum will take commercially reasonable steps to protect your privacy and to provide a level of protection of Personal Data that is comparable to that of your country of residence which may include implementing the European Commission's Standard Contractual Clauses, or another adequate transfer mechanism. For more information on the appropriate safeguards in place to protect your Personal Data, please see the jurisdiction-specific notices below or contact us at compliance@quantinuum.com.

1.6 DISCLOSURE OF YOUR INFORMATION

We may share your Personal Data with selected third parties in accordance

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with applicable Law, including as set out below:

- Our group companies. We may share your Personal Data with our affiliates and group companies as reasonably necessary for the purposes set out in this Policy. If, in the future, the Company re-organizes or transfers all or part of its business, the Company may need to transfer all information to new entities or third parties through which its business will be carried out.
- Service providers. We may share your Personal Data with companies with which we have contracted to provide services on our behalf, such as HR services, hosting websites, conducting surveys, processing transactions, analyzing our Sites and performing analyses to improve the quality of our business, Sites, products and services. We require these service providers to protect the confidentiality of your Personal Data.
- Professional advisers, auditors, and insurers.
- Distributors and other trusted business partners. We may share your Personal Data with third parties that distribute our products and other trusted business partners for purposes that include allowing those third parties to send marketing communications to you. Such sharing of Personal Data for marketing purposes will be performed in accordance with applicable Laws and regulations.
- Disclosure in connection with transactions. In connection with certain transactions, we may disclose some or all your Personal Data to financial institutions, government entities and shipping companies or postal services involved in fulfilment of the transaction.
- Disclosures in connection with acquisitions or divestitures. Circumstances may arise where for strategic or other business reasons Quantinuum decides to sell, buy, divest, merge or otherwise reorganize businesses in some countries. We may disclose information we maintain about you to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, divestiture or sale of all or a portion of Quantinuum's assets.
- Disclosure for other reasons. We may disclose Personal Data if required or authorized to do so by Law or in the good-faith belief that such action is necessary to comply with legal or regulatory requirements or with legal process served on us, to protect and defend our rights or property or, in urgent circumstances, to protect the personal safety of any individual.

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Personal Data may be accessed by third parties and by our Company offices from countries whose laws provide various levels of protection for personal data which are not always equivalent to the level of protection that may be provided in the country of operation of the Company. Where the Company transfers information internationally, the Company will take reasonable steps to ensure that information is treated securely, and the means of transfer provides adequate safeguards.

Personal Data may be stored with, and managed by, a cloud service provider located in a different country to the Company office.

When a third-party Processes Personal Data on behalf of the Company, the Company shall enter into an appropriate Processing contract with the third party to: govern the Processing relationship with the third party; ensure that the third party acts only on instructions from the Company with respect to the Processing of the Personal Data; and provide sufficient written guarantees that the third party has implemented, and is compliant with, appropriate technical, security, and organizational measures designed to protect Personal Data against (a) accidental or unlawful destruction, loss or alteration and (b) unauthorized disclosure or access.

2. TECHNICAL, PHYSICAL, AND ORGANIZATIONAL SAFEGUARDS

2.1 IN GENERAL

The Company protects Personal Data by applying reasonable technical, physical, and organizational safeguards designed to prevent unauthorized or unlawful access to or acquisition or disclosure of Personal Data or any accidental loss, alteration, destruction or damage to Personal Data. These safeguards take into account applicable industry standards, the practicality of the protection, and the sensitivity of the Personal Data being protected and are appropriate to the risks posed by the relevant Processing activities, including the risk of exposure to loss, theft or unauthorized use or access of Personal Data.

2.2 PHYSICAL AND ELECTRONIC SECURITY

The Company maintains physical and electronic measures to protect Personal Data as provided in the Company's security policies.

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2.3 ORGANIZATIONAL SECURITY

The Company maintains organizational measures to protect Personal Data, including:

Privacy Impact Assessments - A Privacy Impact Assessment (PIA) is designed to solicit information needed to ensure compliance with applicable Law, this Policy and other policies and standards while helping the Company avoid significant financial penalties and/or reputational damage that can result from violations of Law or Policy.

A PIA must be performed annually and submitted (or updated, if one had previously been submitted) for any new, or changes to, an existing product, service, application, system or project that involves the Processing of Personal Data.

Role-Based Access - The Company takes steps to ensure that access to Company IT systems that contain Personal Data is given only to those employees who require it to properly perform their role ("role-based access"). For example, role-based access will be utilized for HR systems including but not limited to PeopleSoft, Cezanne and ADP, which are the primary databases containing employee Personal Data. HR employees who are granted role-based access to Company HR systems are required to complete data privacy training and sign appropriate user agreements before accessing the relevant HR system.

Audit - Where required by Law or otherwise in accordance with Company practice, the Company may conduct audits of its data Processing activities and may issue audit reports that are shared with relevant stakeholders.

2.4 REPORTING OF INCIDENTS

Employees should immediately (and in any case no later than 24 hours after discovery) report any actual or suspected compromise of the confidentiality, integrity, or availability of Personal Data or the systems or databases on which the Personal Data is stored, transmitted or Processed; including, but not limited to, any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or acquisition of, or access to, any Personal Data (each, an "Incident") to the Data Protection Officer for investigation regardless of magnitude of the Incident or the type of Personal Data involved.

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The Data Protection Officer shall identify one or more individuals to lead the investigation of the Incident (each a “Primary Investigator”). No action may be taken to investigate the Incident until a Primary Investigator has been appointed by the Data Protection Officer. Notwithstanding the foregoing, any employee responsible for a system or database containing Personal Data that may have been compromised shall take immediate steps to secure that system or database in accordance with relevant Company policies to ensure that any privacy risks arising because of the Incident are mitigated. The Data Privacy Function shall notify Incidents to the relevant supervisory authorities and Data Subjects as may be required by Law.

3. YOUR RIGHTS

Depending on applicable Law, you may have certain rights with respect to your Personal Data:

- **You may have the right to access, correct, update or request deletion** of your Personal Data.
- You can **object** to the Processing of your Personal Data, ask us to **restrict** Processing of your Personal Data or request **portability** of your Personal Data.
- You may have the right **not to have a decision made about you that is based solely on automated processing, including profiling** if that decision produces legal effects about you or significantly affects you.
- Similarly, if we have collected and Processed your Personal Data with your consent, then **you can withdraw your consent at any time**. Withdrawing your consent will not affect the lawfulness of any Processing we conducted prior to your withdrawal, nor will it affect Processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- You may have the right to opt out of the sale of your Personal Data. Quantinuum does not sell your Personal Data to third parties for profit. However, we may share or otherwise disclose your Personal Data to third parties in accordance with this Policy and our Cookie Notice. For example, we may engage with third parties to distribute our products, provide you with technical assistance, operate website analytical tools and features, and engage in marketing and sales of our products and services. Such activities may involve the disclosure of your Personal Data to third parties and may be considered a “sale” of data under certain (but not all) data protection Laws.

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- You have the right to complain to the data protection authority responsible for overseeing compliance with data protection Law in your jurisdiction about our collection and use of your Personal Data if you believe our Processing of your Personal Data does not comply with data protection Law.

We will facilitate your exercise of the rights that apply to you in accordance with applicable Law. However, even if your Personal Data is not afforded protection under, or otherwise subject to, a data protection Law, we may seek to accommodate any request or inquiry you may have regarding our data Processing activities. If you have questions about your rights or wish to exercise your rights, you can contact us at compliance@quantinuum.com.

4. CHILDREN'S INFORMATION

Our Sites are not directed to, and should not be used by, children under the age of sixteen (16) and we do not knowingly collect, use or sell information from such individuals. If you are a minor as understood by Laws of your country, please do not submit any Personal Data through our Sites.

5. LINKS TO OTHER WEBSITES

Our Sites may contain links to third-party websites, products and services. We have no liability or responsibility for those websites, products and services, their policies, or their collection or other Processing of your Personal Data. The practices of those third parties are governed by their own privacy policies. We encourage you to learn about the privacy policies of those third parties.

6. EXCEPTIONS TO THIS POLICY

Consistent with Law, the Data Protection Officer or his/her designee may make exceptions to the requirements of this Policy on a case-by-case basis. Any deviation from or exception to this Policy requires prior written approval from the Data Protection Officer or his/her designee.

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7. CONCERNS AND APPEALS

The Company takes reasonable steps to permit Data Subjects to raise concerns about the way it Processes Personal Data. If an Employee has a concern about the Company's collection or Processing of Personal Data, the Employee should notify the Company's Data Protection Officer at compliance@quantinum.com.

A customer or supplier may also raise concerns with the Company about how it Processes the Personal Data of that customer or supplier. Concerns will be addressed in an appropriate manner in accordance with Law. The Company business units shall provide and notify customers and suppliers of an appropriate contact mechanism for any customer or supplier who has questions about the Company's handling of Personal Data as well as, if applicable, with the contact details of the pertinent Data Protection Officer or similar person or department responsible for the protection of their Personal Data.

8. REGISTRATIONS WITH NATIONAL DATA PROTECTION AUTHORITIES

The Company shall comply with the national data protection Laws and regulations to which it is subject and shall make all required notifications to competent data protection authorities and/or obtain authorizations in respect to its Processing of Personal Data, as required by Law.

DEFINITIONS

Data Subject. For purposes of this Policy, Data Subject means any individual – including current and former employees, job candidates, customers, suppliers and end users of Company's products and services – who is the subject of Personal Data.

Data Protection Officer. Quantinum has delegated authority to our Associate General Counsel of Compliance to serve the role of Data Protection Officer (DPO). The DPO may be contacted at compliance@quantinum.com.

Employee. For purposes of this Policy, "Employee" or "employee" shall include current and former regular, part-time and temporary workers, and non-traditional workers, including secondees, interns, or other temporary assignees.

Quantinum or Company. For purposes of this Policy, Quantinum or Company shall mean *This Data Privacy Policy ("Policy") is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of the Company or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.*

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Quantinuum, its subsidiaries and affiliates, and their respective predecessors and successors.

Information Resources. For purposes of this Policy, Information Resources means Company assets used to store, process, or transact data (e.g., media devices, portable storage devices, workstations, laptops, phones and other telecommunications devices, networks, web resources, and email).

Law. For purposes of this Policy, Law means all applicable international, national, state, provincial, and local laws and regulations.

Personal Data. For purposes of this Policy, Personal Data means any information relating to an identified or identifiable natural person in accordance with Article 4 of the GDPR; or 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 in accordance with CA Civ. Code § 1798.140; or any data, whether true or not about an individual who can be identified from that data or from that data and other information to which we have or are likely to have access in accordance with section 2 of the SG PDPA. An identifiable natural person is one who can be identified directly or indirectly in particular by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. Personal Data shall include Sensitive Identification Data and Sensitive Personal Data.

Processing (or Process, Processes or Processed). For purposes of this Policy, Processing means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Sensitive Identification Data. For purposes of this Policy, Sensitive Identification Data means certain types of Personal Data that pose a risk of financial, reputational, or other harm to the Data Subject if compromised, such as a national identification number (e.g., Social Security Number in the U.S., Social Insurance Number in Canada and Permanent Account Number in India), driver's license number, bank account number, credit or debit card number, passport number and date of birth (when in combination with other data that can subject an individual to risk of identity theft), and user names and passwords for online accounts.

Sensitive Personal Data. For purposes of this Policy, Sensitive Personal Data means Personal Data that reveals race or ethnicity, political opinions, religious or philosophical beliefs, membership in a trade union, processing of genetic data and biometric data for the purpose of uniquely identifying a natural person, data concerning health, data concerning a natural person's sex life and sexual orientation and criminal records.

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Additional terms not defined herein can be found in the Glossary of Terms and Acronyms. **RESPONSIBILITY FOR THE POLICY:**

OWNERSHIP: The Company Chief Legal Officer shall serve as the policy “owner” and be responsible for future revision cycles.

POLICY CONTACT: Chief Legal Officer

REVISION HISTORY:

Effective Date	Version	Description of Change	Section(s) Affected
15-JUL-2023	1.0	Updating to account for U.S. state and global privacy law requirements and industry best practices.	All
25-APR-2025	2.0	Updating the contact telephone number.	All
15-OCT-2025	3.0	Updating to ensure compliance with Singapore laws and regulations.	All

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