ONTOLY PRIVACY STATEMENT

Version 1.1 — Final — November 2, 2026 (Version 1.0: August 24, 2026)

1483124 BC Ltd. dba Ontoly and its affiliates and subsidiaries (collectively, "**Ontoly**", "**we**", "**our**" or "**us**") recognize the importance of privacy. The purpose of this privacy statement ("**Privacy Statement**") is to inform you about our privacy practices, including how we collect, use and disclose your Personal Information. We provide this Privacy Statement at or before the point at which we collect Personal Information from you.

Ontoly administers the Building Emissions Reduction Standard (BERS) Program and operates the **Sites and Services**, which comprise www.ontoly.org, the **Ontoly Portal** (our secure, authenticated operational interface, and the only venue through which BERUs are bought, held, transferred and retired), and the **Ontoly Registry** (our public-facing database). This Privacy Statement applies to all of them, and to all Platform Activities, unless we have provided you with a separate privacy statement for a particular product, service or activity.

It applies to you whether or not you have an account. It covers visitors who browse our website or the public Registry, Account Holders on the Ontoly Portal including buyers of BERUs, and individuals whose information reaches us from someone else — for example beneficial owners, Building Owners and retirement beneficiaries.

This Privacy Statement forms part of the Ontoly Program Rules and should be read together with the Ontoly Platform Terms and Conditions (the "**Platform Terms**"), the BERS Standard, the BERS Validation and Verification Standard, the Know Your Customer (KYC) Policy, the Acceptable Use Policy, the E-Sign Consent and the Cookie Policy. Capitalized terms used but not defined in this Privacy Statement have the meanings given to them in the Platform Terms. In the event of any conflict between this Privacy Statement and any other Ontoly Program Rules, the order of precedence set out in Section 2.4 of the Platform Terms applies, except that this Privacy Statement governs our handling of Personal Information to the extent required by applicable privacy laws.

Please review this Privacy Statement carefully. By submitting your Personal Information to us, by opening or maintaining an account on any Ontoly Platform, by registering for or using any of the services we offer, by undertaking any Platform Activity, by using our website, or by voluntarily interacting with us, you consent to our collecting, using and disclosing your Personal Information as set out in this Privacy Statement, as revised from time to time.

Two points deserve particular attention. First, the Ontoly Registry is a **public database** — certain information relating to Projects, BERU issuance, Disposition, Retirement and cancellation, and to enforcement action under the BERS Program, is published publicly and is retained on a long-term basis. Second, because Ontoly administers a carbon crediting program with financial-integrity controls, we collect **identity verification and financial-crime screening information**, including information about the individuals who ultimately own or control an Account Holder. We verify identity electronically wherever we can, and we ask for a government-issued identification document only in limited circumstances. Both topics are described in detail below.

How to Use This Privacy Statement

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Privacy statements are long because the law requires them to be complete. This one is organized so you can find what applies to you:

If you are…	The sections that matter most to you
Just browsing the website or the public Registry	Personal Information We Collect (technical and usage information); Our Use of Cookies; Rights Regarding Personal Information
A buyer of BERUs	Buying BERUs Through the Ontoly Portal; Identity Verification and Anti-Money Laundering Information; Public Disclosure Through the Ontoly Registry; Retention; Rights Regarding Personal Information
An Ontoly Portal Account Holder	All of it, and in particular Identity Verification and Anti-Money Laundering Information, and Public Disclosure Through the Ontoly Registry
A beneficial owner, Building Owner or retirement beneficiary whose details someone else gave us	Personal Information About Other Individuals; Public Disclosure Through the Ontoly Registry; Rights Regarding Personal Information
A resident of the European Economic Area or the United Kingdom	Regional Supplement — European Economic Area and United Kingdom, together with the rest of this Statement
A resident of the United States	Supplemental Notice for US Residents, together with the rest of this Statement

Our Role

For most of what we do, Ontoly decides why and how personal information is handled — we are the organization accountable for it, and we answer to you directly for it. That is the case for account information, identity verification, Project and Registry data, and BERU transactions.

There are two exceptions worth naming. **Card and bank details used to pay our fees are handled by our payment processor, not by us** — see "Buying BERUs Through the Ontoly Portal" below. And where a **Validation Body or Verification Body** receives your information, it acts under contract with Ontoly for the specific purpose of validation or verification, and is separately accountable for its own professional records.

Privacy Statement Updates

This Privacy Statement is current as of the "updated" date which appears at the top of this page. We may make changes to this Privacy Statement from time to time to reflect changes in our practices, our services or products, the BERS Program, or applicable laws. Consistent with Section 2.5 of the Platform Terms, where a change is material we will notify Account Holders via an Ontoly Platform or by email at least thirty (30) days before it takes effect. Non-material changes become effective when published in a revised Privacy Statement posted on our website unless otherwise noted. Your continued use of any Ontoly Platform, or your undertaking of any Platform Activity, following the effective date of a change will be deemed acceptance of the revised Privacy Statement.

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What's in this Privacy Statement?

This Privacy Statement covers the following topics:

- How to Use This Privacy Statement
- Our Role
- Meaning of Personal Information
- Personal Information We Collect
- Identity Verification and Anti-Money Laundering Information
- Sensitive Personal Information
- Information We Collect From Other Sources
- Personal Information About Other Individuals
- How We Use Your Personal Information
- How We Share Your Personal Information
- Buying BERUs Through the Ontoly Portal
- Service Providers We Rely On
- Public Disclosure Through the Ontoly Registry
- Financial Additionality Rating
- Confidential Information and Personal Information
- Your Consent to Collection, Use and Disclosure
- Our Use of Cookies
- Opting Out of Communications
- Retention of Personal Information
- International Transfer and Storage of Information
- Information Security
- Automated Processing
- Rights Regarding Personal Information
- How to Exercise Your Rights
- Regional Supplement — European Economic Area and United Kingdom
- Regional Supplement — Quebec

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- Third Party Websites and Services
- Children
- Governing Law
- How to Contact Us
- Supplemental Notice for US Residents

Meaning of Personal Information

"Personal Information" means information about an identifiable individual as described under applicable privacy laws, including the *Personal Information Protection and Electronic Documents Act* (Canada) ("**PIPEDA**"), the *Personal Information Protection Act* (British Columbia) and, where applicable, the US Consumer Privacy Laws described below.

Personal Information does not include business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, or work e-mail address. Much of the information exchanged through the Ontoly Platform in the ordinary course of the BERS Program is business contact information of this kind, or is information about a building, a corporation or another entity rather than about an individual.

Personal Information also does not include information that has been de-identified, anonymized or aggregated in such a way that there is no serious possibility it can be used to identify an individual, whether on its own or in combination with other information. Where we hold information in de-identified or aggregated form, we maintain it in that form, we do not attempt to re-identify it except as permitted by law to test our de-identification methods, and we require by contract that any recipient do the same.

Where information about a Project, a premises, a Building Owner or a Building Representative can reasonably be associated with an identifiable individual — for example, where a Building Owner is a natural person or a sole proprietorship — we treat that information as Personal Information.

Personal Information We Collect

Personal Information reaches us in three ways. This table is the summary; the detail follows.

How it reaches us	What it is	Where it comes from
You give it to us	Identity and contact details, account credentials, Account Purpose Declaration, identity verification details, beneficial ownership declarations, Project and building data, financial additionality data, monitoring reports, retirement instructions, corre	pondence You, or an Account Holder acting for you
We collect it automatically	IP address, device and browser details, log data, pages viewed, session and security	Your device, when you use the Sites

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How it reaches us	What it is	Where it comes from
	data, approximate location from IP	
We get it from others	Identity and address verification results, sanctions and PEP screening results, adverse media and litigation history, corporate registry and land title records, transaction outcomes and chargeback notices, verification findings	Screening providers, public registries, our payment processor, Validation and Verification Bodies, other Account Holders

The categories below set out what we collect in each case. Not all of them will apply to you — a visitor reading the public Registry generates only technical and usage information, while an Account Holder submitting a Project generates most of the list.

- **identity information**, such as your name, username or similar identifier, date of birth, title and role (for example, whether you act as a Building Owner, Building Representative, buyer, investor, intermediary, or Validation Body or Verification Body personnel);
- **contact information**, such as your residential or billing address, delivery address, e-mail address and telephone numbers;
- **identity verification and anti-money laundering information**, as described in the next section;
- **account information**, such as the contents of your Account Purpose Declaration — the nature of your business activities, your intended use of the Ontoly Platform, and the jurisdiction(s) in which you intend to operate — together with account credentials, security settings and account status;
- **financial information**, such as your bank account number and payment card details used to pay fees under the Ontoly Fee Schedule, invoicing and remittance details, payment history, and source-of-funds documentation such as bank statements, tax documentation or investment account statements where enhanced due diligence applies;
- **Project and building information**, such as the address and characteristics of the premises applicable to a Project, evidence of legal and beneficial title, the Building Owner Attestation & Representative Authorization Form, Eligible Engineering Documentation, utility account details, metered performance data, occupancy data, non-routine adjustment and operational change disclosures, and the financial data submitted in support of the Financial Additionality Assessment;
- **Platform Activities information**, such as records of account opening, maintenance and closure; Project listing and registration; Monitoring Report submissions; verification correspondence; BERU issuance, holding, Disposition, transfer acceptance, Retirement and cancellation; and the Retirement disclosures required under Section 8.2 of the Platform Terms, including the identity of the Person on whose behalf a BERU is Retired and the stated purpose of the Retirement;

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- **compliance, audit and enforcement information**, such as records of investigations, audits and forensic reviews, Corrective Action Notices, findings of non-conformance, data manipulation or material misrepresentation, suspensions, disqualifications and related correspondence;
- **technical and usage information** when you use our website or the Ontoly Platform, such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use;
- **correspondence and support information**, such as notices, requests, complaints and other communications you send to us at info+info+privacy@ontoly.org, info@ontoly.org or through your Ontoly Platform account;
- **contracts and documents you upload**, including any Pre-Purchase Agreement or forward sale contract a buyer uploads to obtain a Reservation. These are executed away from the Ontoly Platform between the buyer and the Building Representative; we receive them only to record the Reservation, we do not verify or interpret them, and we do not publish them or their commercial terms;
- **transaction information**, as described under "Buying BERUs Through the Ontoly Portal" below, including purchase and transfer records, retirement instructions, invoice and payment references from our payment processor, and fraud and sanctions screening results;
- **event participation information**, such as your enrollment and attendance at our events;
- **information provided via surveys and contests**; and
- **marketing and communications information**, such as your preferences for receiving our newsletter.

Identity Verification and Anti-Money Laundering Information

Ontoly maintains a Know Your Customer (KYC) Policy in support of the financial-integrity controls of the BERS Program. Under that policy we collect, verify and retain the following categories of Personal Information from applicants for Supplier Accounts and Buyer Accounts, from Building Owners and Building Representatives, from Validation Bodies and Verification Bodies and their personnel, and from counterparties to BERU transactions:

- **identity details used for electronic verification**, being your name, date of birth and residential address, which we confirm against independent data sources through a dedicated electronic identity verification provider. Where that check returns a confirmed match, we do not ask you for an identity document;
- **a government-issued photo identification document**, such as a passport, driver's licence or national identity card, **only where** electronic verification is inconclusive, where a discrepancy in your information cannot otherwise be resolved, or where enhanced due diligence applies to you under the KYC Policy. Where you provide such a document we record the document type, issuing authority, document number and

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expiry date and the outcome of our verification, and we do not retain an image of the document after verification is complete;

- **proof of residential address**, such as a utility bill, bank statement or lease agreement, only where your address is not confirmed by electronic verification;
- **entity information**, including constating documents, business registration details and confirmation of good standing obtained from the applicable corporate registry;
- **beneficial ownership information**, including the identity of each natural person who directly or indirectly owns or controls 25% or more of the voting equity of an entity applicant, the identity of officers, directors and managers with decision-making authority, organizational charts where the ownership structure includes more than one intermediary layer, and signed beneficial ownership declarations;
- **information about trusts and similar structures**, including the identity of settlors, trustees, beneficiaries entitled to 25% or more of the trust's capital or income, and any person holding power to amend or revoke the trust. We do not require the identification of contingent or discretionary beneficiaries below that threshold unless the trust is classified as Higher Risk;
- **politically exposed person (PEP) status**, including whether you hold or have held a prominent public position and whether you are a spouse or common-law partner, child or parent of such a person, or a person publicly known to be closely associated with one;
- **sanctions screening results**, including matches, partial matches and the outcome of our review of them;
- **adverse media, litigation and regulatory history** obtained through screening, where relevant to a risk assessment;
- **source of funds information**, being a declaration of the source of the funds used to pay our fees or to acquire BERUs and, where enhanced due diligence applies, documentary evidence supporting that declaration;
- **records of the identity verification methods used**, which may include a short verification conducted by video conference, and the outcome of database and third-party verification checks; and
- **risk classification and due diligence records**, including our assessment notes and any approvals required under the KYC Policy.

When we collect it. We collect this information **at the point you request an Ontoly Portal account**, and we complete our checks before the account is activated. Your Portal account cannot be activated, and no Project may be listed and no BERU issued, transferred, accepted or Retired, until they are complete. **The Ontoly Registry is publicly viewable without an account**, so if you only wish to view the Registry, we do not collect identity information from you at all.

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We collect this information because it is necessary to verify identity, to assess and manage financial-crime risk, to comply with sanctions law, and to protect the integrity of the BERS Program and the Ontoly Registry. We collect the minimum information necessary for those purposes, and we ask for identity documents only in the circumstances described above. Where we are required by law to collect, retain or report this information — in particular under sanctions legislation, which applies to us regardless of our regulatory classification — we do so on the basis of that legal obligation rather than on the basis of your consent, and you cannot withdraw consent to that processing while you hold an account.

What we do not do. We do not use facial recognition, liveness detection or any other biometric identification technology, and we do not create, collect or store biometric identifiers or templates. We do not obtain consumer credit reports about you for identity verification purposes. We do not collect social insurance or social security numbers. Where a documentary discrepancy cannot be resolved electronically we may arrange a short live video call solely to confirm that the person presenting a document is the person shown in it; we do not retain a recording of that call beyond a record of the outcome.

Anti-money laundering reporting. Ontoly is not a "reporting entity" under Canada's *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* or a "financial institution" under the US *Bank Secrecy Act*. We therefore do not file Suspicious Transaction Reports with FINTRAC or Suspicious Activity Reports with FinCEN, and we do not disclose your Personal Information to those agencies. We may refer a matter to police or a regulator where we have reasonable grounds to believe an offence has occurred and the disclosure is permitted by privacy law, and we are required to make reports and disclosures under sanctions legislation as described below. If our activities change such that we become a reporting entity, we will update this Privacy Statement before any reporting begins.

Sensitive Personal Information

Some of the information we collect for identity verification and anti-money laundering purposes is treated as "sensitive personal information", "sensitive data" or a comparable category under certain privacy laws. This includes the number of a government-issued identification document, where you have provided one in the circumstances described above, together with account log-in credentials and financial account information. We do not collect social insurance or social security numbers.

We collect and use sensitive personal information only for the purposes described in this Privacy Statement — principally identity verification, fraud prevention, sanctions and financial-crime screening, security, payment processing, and compliance with legal obligations. **We do not use or disclose sensitive personal information for the purpose of inferring characteristics about you, and we do not sell it or share it for cross-context behavioural advertising.** Where a right to limit our use of sensitive personal information applies to you under applicable law, you may exercise it by contacting us as described below; we will honour that request except to the extent the information is necessary for the purposes permitted by law, including performing our services and complying with legal obligations.

We do not seek to collect information revealing racial or ethnic origin, religious or philosophical beliefs, health, sex life, sexual orientation, or trade union membership, and we ask that you do not provide such information to us. Where information of that kind appears

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incidentally in a document you provide (for example, on an identity document), we do not use it for any purpose other than verifying the document.

Information We Collect From Other Sources

We do not collect all Personal Information directly from you. We also obtain Personal Information from the following sources:

- **identity verification providers**, which we use to confirm your name, date of birth and address against independent data sources and, where you have provided an identity document, to confirm that it is authentic and current. We do not obtain consumer credit reports about you for this purpose;
- **sanctions, PEP and adverse media screening providers**, which maintain databases compiled from government sanctions lists, public records, court and regulatory filings and media reporting;
- **government and public registries**, including corporate registries, land title records and sanctions lists;
- **Account Holders and their representatives**, who provide information about beneficial owners, authorized representatives, Building Owners and Retirement beneficiaries;
- **Validation Bodies and Verification Bodies**, in the course of validation and verification under the BERS Validation and Verification Standard;
- **our service providers**, in the course of providing services to us; and
- **publicly available sources**, including the Ontoly Registry itself.

Where we obtain a screening result or a report about you from a third party and that result contributes to a decision to refuse, restrict, suspend or close an account, you may ask us for information about the source of that result, and we will provide it to the extent we are permitted to do so by applicable law. Some information cannot be disclosed to you — see "Rights Regarding Personal Information" below.

Personal Information About Other Individuals

In the course of the BERS Program we necessarily collect Personal Information about individuals who are not themselves Account Holders. This includes beneficial owners, directors, officers and authorized representatives of entity Account Holders; settlors, trustees and beneficiaries of trusts; Building Owners; Retirement beneficiaries; personnel of Validation Bodies and Verification Bodies; and, where PEP screening applies, immediate family members and known close associates of a politically exposed person.

If you provide Personal Information about another individual to us, it is your responsibility to ensure that you are entitled to do so and, where required, to obtain that individual's consent and to bring this Privacy Statement to their attention, so that we may collect, use and disclose their information as described here — including any publication on the Ontoly Registry. This obligation is in addition to your representations and warranties under Part XI of the Platform Terms.

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Individuals whose Personal Information we hold in this way have the same rights under this Privacy Statement as Account Holders, and may contact our Privacy Officer directly using the details below.

How We Use Your Personal Information

We may use your Personal Information for purposes such as:

- administering the BERS Program and operating, maintaining and securing the Ontoly Platform, including the Ontoly Portal and the Ontoly Registry;
- opening, maintaining, suspending, closing and administering your accounts, and communicating with you about them;
- verifying your identity and eligibility, determining beneficial ownership, conducting sanctions, PEP and adverse media screening, assessing and classifying financial-crime risk, monitoring for suspicious activity, and meeting our anti-money laundering and counter-terrorist-financing obligations and commitments;
- reviewing, assessing, registering and listing Projects, assigning Projects to Validation Cohorts and Verification Cohorts, contracting Validation Bodies and Verification Bodies, and administering the validation and verification processes under the BERS Standard and the BERS Validation and Verification Standard;
- issuing, serializing, recording, tracking, transferring, cancelling and Retiring BERUs, and maintaining the audit trail necessary to prevent double-counting and double-claiming;
- calculating, invoicing and collecting fees and payments, and administering taxes and interest on overdue amounts;
- publishing information on the Ontoly Registry as described below;
- enhancing transparency for stakeholders, including traceability of environmental attributes, and conducting assessments for alignment with the ICVCM Core Carbon Principles, carbon credit quality ratings, CORSIA, Article 6 of the Paris Agreement, or other third-party integrity frameworks;
- auditing accounts and Platform Activities, reviewing or requesting additional evidence in respect of a Project (including post-issuance), and engaging third-party auditors or forensic investigators;
- investigating and responding to suspected breaches of the Ontoly Program Rules, suspected fraud, data manipulation, misrepresentation, greenwashing or misleading environmental claims, and taking enforcement action;
- monitoring the usage of our products and services to support their proper functioning, security and further improvement;
- analyzing the needs and activities of our Account Holders and users to help us better serve them, and improving our offerings;

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- generating de-identified and aggregated data to conduct research, statistical reporting and analysis related to the BERS Program, our business, products and services;
- responding to inquiries, notices, complaints and other requests, and providing customer and technical support;
- collecting opinions and comments about our products and services;
- sending you marketing communications where you have consented to receive them or where we are otherwise permitted by law to do so, including under Canada's anti-spam legislation;
- establishing, exercising or defending legal claims, enforcing the Ontoly Program Rules, protecting our rights, operations and property, and pursuing available remedies or limiting damages; and
- complying with applicable laws and responding to lawful requests from regulators, courts and law enforcement.

We will not use your Personal Information for a materially different purpose without first providing notice and, where required, obtaining your consent.

Tier 2 Data. Section 10.3 of the Platform Terms grants Ontoly a licence in respect of data, materials and documents you submit ("Tier 2 Data"). That licence governs the commercial and program use of Tier 2 Data as a body of information. It does not displace privacy law: where Tier 2 Data contains Personal Information, we use and disclose that Personal Information only for the purposes set out in this Privacy Statement, and your rights of access, correction, withdrawal of consent and (subject to the limits described below) deletion continue to apply notwithstanding that licence.

How We Share Your Personal Information

We may share your Personal Information with the following categories of recipients:

- **Identity verification, screening and due diligence providers.** We disclose identifying details to providers of identity verification, address verification, sanctions, PEP and adverse media screening services in order to run the checks described above. We do not disclose your details to consumer credit reporting agencies for identity verification purposes. These providers act on our behalf under written contracts, or as independent controllers of their own reference databases as permitted by law.
- **Validation Bodies and Verification Bodies.** We share Project data, Eligible Engineering Documentation, financial additionality data, Monitoring Reports, supporting documentation and related Personal Information with the qualified, independent, accredited Validation Body contracted by Ontoly for your Validation Cohort, and with the Verification Body contracted by Ontoly for your Verification Cohort. Both are engaged by Ontoly rather than by you, and both are subject to confidentiality and conflict-of-interest obligations under the BERS Validation and Verification Standard and the Conflict of Interest Policy.

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- **Service providers.** We rely on third party service providers to perform services on our behalf, such as data hosting and processing, platform administration, technical support, payment processing, communications, and analytics. As contemplated by Section 18.4 of the Platform Terms, our administration of the Ontoly Registry, the Ontoly Portal and the BERS Program may be performed by third parties contracted by us. We engage service providers under written contracts that require them to keep Personal Information secure, to handle it only for the limited purposes we specify, and not to disclose it to unauthorized parties or use it for their own direct marketing purposes.
- **Prospective and existing BERU buyers.** Where you have indicated an intention to transact with a counterparty, or where a counterparty has entered into a non-disclosure agreement with Ontoly, we may provide that counterparty with access through the Ontoly Portal to the Verification Report for the relevant Verification Cohort applicable to your Project, in accordance with Section 16.2(d) of the Platform Terms.
- **Counterparties to Platform Activities.** Where you Dispose of or accept BERUs, we disclose to the other party the information necessary to identify the transferor or transferee and to complete, record and confirm the transaction.
- **Financial Market Settlement Systems.** We may exchange information with an exchange, clearing house, central counterparty, custodian or other settlement system in connection with settlement instructions and with any erroneous or fraudulent transfer affecting an account in the Ontoly Portal.
- **Regulatory, financial intelligence and law enforcement authorities.** We may disclose Personal Information to regulators, financial intelligence units and law enforcement where required or permitted by law, where necessary to comply with a legal obligation, or where fraud, sanctions evasion or material misrepresentation is suspected. In some circumstances we are prohibited by law from informing you that such a disclosure has been made or is contemplated.
- **Professional advisers, auditors and insurers**, under duties of confidentiality.
- **Our payment processor.** We share with Stripe the information needed to process payment of **our own fees** and to detect fraud. Stripe handles your card or bank details directly and acts under its own privacy policy as well as under contract with us. **We do not use Stripe, or any other processor, to handle the price you pay a Building Representative for BERUs — that money never passes through us or through any processor we engage.**
- **Purchasers and successors.** We may transfer your Personal Information and other information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets, or other business transaction.
- **The public, through the Ontoly Registry**, as described in the next section.

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Additionally, we may use and disclose your information when we believe such use or disclosure is permitted, necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce the Ontoly Program Rules; (e) to protect our rights, operations or property, or the safety of any person; and (f) to allow us to pursue available remedies or limit the damages that we may sustain.

If we otherwise intend to disclose your Personal Information to a third party for a purpose not described above, we will identify that third party and the purpose for the disclosure, and obtain your consent.

Buying BERUs Through the Ontoly Portal

The Ontoly Portal is where Building Representatives offer issued BERUs for sale and buyers acquire them. **Every buyer holds an activated Ontoly Portal account and has completed our identity and anti-money-laundering checks; there is no guest, unregistered or anonymous route to acquiring a BERU.** Three things about it affect your privacy directly.

We never handle the money, and we do not hold your card details

The price you pay a Building Representative for BERUs is paid by you directly to that Building Representative, away from the Ontoly Portal. Ontoly never receives, holds, escrows or has custody of that money, and we neither see nor store the account details you use to pay it. Separately, you pay Ontoly its own fees — the Certification Fee, and for Building Representatives the Preliminary Assessment Report Fee — through the Ontoly Portal, and those payments are processed by our payment processor, **Stripe**. **We do not collect or store your full payment card number, CVV or bank account credentials**; those are collected directly by Stripe and handled under Stripe's own privacy policy and terms, which you accept separately. We receive from Stripe only what we need to record the payment of our fee and provide support — for example a transaction reference, the amount, the last four digits and card brand, the outcome, and any chargeback or dispute notice.

What we collect when you buy

When you acquire BERUs we collect: your name and email address; the quantity and serial numbers of the BERUs transferred to you; the Certification Fee you pay us and the reference for that payment from Stripe; the Building Representative's confirmation that it has received the purchase price from you; your IP address and device information; the results of sanctions and fraud screening; and **the retirement details you provide — the beneficiary and the declared purpose of retirement. We do not collect the price you agreed with the Building Representative unless you or the Building Representative give it to us**, for example in an uploaded Pre-Purchase Agreement, and where we do hold it we treat it as confidential and do not publish it or disclose it to other Account Holders.

Retirements are published

When BERUs are retired, the retirement is published on the public Ontoly Registry — the quantity, the retiring entity, the **named beneficiary** and the declared purpose. This is required by BERS Standard Section 12.3.1 and we cannot suppress it. The published record is permanent, is downloadable in bulk, and may be copied and indexed by others.

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If you are retiring on behalf of someone else, tell them their name will be published before you submit the retirement. If you do not want a name published, contact us first and we will explain the options.

Buying is available only from the Eligible Jurisdictions published on the Ontoly Portal, as set out in Section 6B.15 of the Platform Terms. Every buyer is screened against sanctions lists before a transfer is recorded, as required by law, and no transfer is recorded where a screening match is unresolved. Because every buyer holds an Ontoly Portal account, the identity verification, beneficial ownership, politically-exposed-person and adverse media checks described under "Identity Verification and Anti-Money Laundering Information" apply to every buyer.

Service Providers We Rely On

We name our main service providers so you can see who is involved rather than having to accept a generic reference to "third parties". This list is current as at the date of this Statement and may change; the current list is available on request from our Privacy Officer.

Provider	What they do for us	Where they process
Stripe	Processing payment of Ontoly's own fees, payment credential handling, fraud screening. Stripe is not used to process, and does not process, the price paid by a buyer to a Building Representative for BERUs.	United States, Canada
Identity verification provider	Electronic confirmation of identity and address at account opening	anada, United States
Sanctions, PEP and adverse media screening provider	Screening against sanctions lists and politically-exposed-person data	Canada, United States, international databases
Cloud hosting and infrastructure provider	Hosting the Ontoly Platform, the Registry and our website; backups	Canada, United States
Google LLC (Google Analytics 4)	Aggregate website usage measurement on ontoly.org (optional, consent-based). Google Signals, advertising personalization and Ads linking are disabled	United States
Webflow, Inc.	Hosting and delivery of the ontoly.org website, and secure operation of our contact and newsletter forms	United States
Mailchimp (Intuit Inc.)	Delivery of our newsletter and marketing emails to subscribers who have opted in	United States
Calendly LLC	Scheduling of meetings you choose to book with us. Calendly opens on its own website and collects your details directly	United States
Email and	Delivering operational notices, invoices and	Canada, United

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Provider	What they do for us	Where they process
communications provider	newsletters	States
Consent management provider	Presenting our cookie consent popup, applying your cookie choices, and keeping the record of the consent you gave	United States
Contracted Validation Bodies and Verification Bodies	Independent validation and verification under the BERS Program	Varies by engagement

Every provider in this table is engaged under a written contract that limits what they may do with your information, requires them to keep it secure, and prohibits them from using it for their own purposes. Stripe is different in one respect: it handles your payment credentials as a payment processor under its own privacy policy as well as under contract with us.

Public Disclosure Through the Ontoly Registry

The Ontoly Registry is a **public-facing** digital platform that serves transparency and public disclosure functions. It is distinct from the Ontoly Portal, which is the secure, authenticated operational interface. Information published on the Ontoly Registry can be viewed by anyone, may be indexed by search engines, and may be copied, cached, republished or retained by third parties beyond our control. Once information is published, our ability to withdraw it is limited.

We publish the minimum information necessary to serve the transparency purposes of the BERS Program. In accordance with Sections 4.5, 8.2, 9.5 and 16.3 of the Platform Terms, we publish on the Ontoly Registry:

- non-confidential Project information as specified in the BERS Standard, including the Project Registration Report, Project Description Report, Project identifiers and Project status. Consistent with BERS Standard Section 5.3.6(c), **Project location is published only to the first three digits of the postal code or ZIP code**, not to a full street address;
- Validation Statement summaries and Verification Statement summaries, including the BERS Public Validation Summary;
- the **Financial Additionality Rating** for each Project, as described below — the Rating itself is published, the underlying financial data is not;
- BERU issuance, Disposition, Retirement and cancellation records. As required by BERS Standard Section 12.3.1, for every retired batch we publish the quantity, the **retiring entity**, the **named beneficiary** and the **declared purpose of retirement**, together with serial numbers, vintage, methodology and retirement date. You should assume that a beneficiary you name will be published;
- enforcement actions, including Corrective Action Notices, suspensions, BERU cancellations and Project disqualifications; findings of intentional data manipulation

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or material misrepresentation; the identity of non-compliant Projects (by Project ID); the status and outcome of corrective actions; and the suspension or termination of any Project, Validation Body or Verification Body and the rationale for it; and

- such other information as may be required by the ICVCM Core Carbon Principles, CORSIA, Article 6 of the Paris Agreement, or applicable law.

Individual names. Where an Account Holder, Building Owner or Retirement beneficiary is an entity, we publish the entity name and Project identifier rather than the names of individuals. We publish the name of an individual where that individual is themselves the Account Holder, Building Owner or Retirement beneficiary — the BERS Standard requires the retiring entity and named beneficiary to be published for every retired batch, and we cannot suppress them — or where publication is otherwise required by applicable law or the Ontoly Program Rules. If you are retiring on behalf of an individual, tell them their name will appear on a public database before you submit the retirement. We do not publish contact details, identity document details, beneficial ownership information, date of birth, financial account information, source-of-funds information, screening results or any other identity verification or anti-money laundering information on the Ontoly Registry.

Enforcement findings. We publish an enforcement finding only after the affected Account Holder has been notified and given an opportunity to respond through the Corrective Action process set out in the BERS Standard, except where immediate publication is necessary to prevent ongoing harm or is required by law. Published findings state the factual basis and outcome. Where a finding is subsequently varied, withdrawn or resolved, we will publish an update to that effect and amend or annotate the original entry.

Confidential material is not published. Verification working papers, unredacted verification reports, and identity verification and anti-money laundering records are not published on the Ontoly Registry or displayed in the Ontoly Portal to anyone other than you and, where applicable, the Validation Body or Verification Body contracted by Ontoly in respect of your Project.

Financial Additionality Rating

To assess whether a Project would have proceeded without BERU revenue, we collect detailed Project financial information — including capital cost, grants and incentives received, contracts, financing terms and projected returns — and use it to calculate a net present value for the Project.

The underlying financial information you submit is confidential and is not published. We do not disclose your capital costs, grant amounts, contract terms, financing terms or net present value figures on the Ontoly Registry or in the Ontoly Portal to any party other than the Validation Body or Verification Body contracted by Ontoly in respect of your Project and those who need it to administer the BERS Program.

The results derived from that information are published. Consistent with BERS Standard Section 10.5.2, the **NPV Financial Additionality Test result (pass or fail)** and the rating assigned by reference to the magnitude of the Project's funding gap — a score of 1 to 5, together comprising the **Financial Additionality Rating** — are publicly displayed. The Rating is a summary indicator of the strength of a Project's financial additionality. It is displayed on

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the public Ontoly Registry and in the Ontoly Portal, alongside the Project identifier. Publication of the Rating is a requirement of the BERS Program, because the credibility of a BERU depends on a public, comparable indication that the underlying Project needed carbon revenue to proceed.

Where the Building Owner of a Project is a natural person or a sole proprietorship, the published Rating may constitute information about that individual's financial affairs. In those cases we publish the Rating **as a band or category only, tied to the Project identifier**, and we do not publish the underlying figures, the calculation inputs, the net present value, or any other derived monetary amount. If you are an individual Building Owner and you have concerns about the publication of a Rating for your Project, contact our Privacy Officer before your Project is registered so that we can explain what will be published and discuss whether the Project can be listed under an entity name.

Uploaded contracts are not published. Where a buyer uploads a Pre-Purchase Agreement to obtain a Reservation, we treat it as Confidential Information. We may record on the Registry that a stated volume of a Project's forecasted credits is reserved, but we do not publish the contract, its commercial terms, or the identity of the buyer, unless both parties consent.

Bulk access. Under BERS Standard Section 15.1.2(b), retirement data is made available in machine-readable CSV and XLSX format, searchable and downloadable at no cost without login credentials. Published Registry information can therefore be copied and analysed in bulk by anyone, not merely viewed one record at a time.

Where published information identifies or can reasonably be associated with an individual, it is Personal Information. By opening an account, listing a Project, requesting BERU issuance or Retiring a BERU, you consent to the publication of that information and acknowledge that publication is a necessary and integral feature of a credible carbon crediting program.

Your rights to request correction or deletion are limited in respect of published Registry records: Retirement is irrevocable and permanent, and issuance, transfer, Retirement and cancellation records form part of the permanent audit trail that prevents double-counting. We will correct demonstrable factual inaccuracies in Registry records, and we will consider in good faith any request to minimize the Personal Information published about you where doing so would not compromise the integrity or transparency of the BERS Program. We will not delete records whose retention or publication is required by the Ontoly Program Rules or applicable law.

As provided in Section 16.6 of the Platform Terms, Ontoly's right to publicly disclose enforcement actions takes precedence over any claim of confidentiality with respect to the information so disclosed, and, as provided in Section 4.5, that right survives termination of the Platform Terms.

Confidential Information and Personal Information

Part XVI of the Platform Terms designates certain non-public information provided to or through an Ontoly Platform — including building-level utility data, metered performance data, financial data submitted for the Financial Additionality Assessment, occupancy data, monitoring reports and verification working papers — as "Confidential Information". Some

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Confidential Information is also Personal Information. Where that is the case, both our confidentiality obligations under Part XVI and our obligations under this Privacy Statement and applicable privacy laws apply, and we apply whichever affords the greater protection. Our contractual confidentiality obligations under Part XVI survive termination for a period of five (5) years; our obligations under applicable privacy laws are not limited to that period.

Your Consent to Collection, Use and Disclosure

We collect, use and disclose your Personal Information with your consent or as otherwise permitted or required by applicable privacy laws. How we obtain your consent may be express or implied and will depend on the circumstances, the reasonable expectations of the individual, and the sensitivity of the information collected. Where you provide Personal Information to us in connection with a service you have requested, we will treat that as consent to use the information for the purposes identified to you at the time.

Processing that does not depend on consent. Some of our processing is carried out to comply with legal obligations or to protect the integrity of the BERS Program, and does not depend on your consent. This includes identity verification, beneficial ownership determination, sanctions, PEP and adverse media screening, ongoing monitoring, record retention required by law, reporting to regulators and financial intelligence units, and the publication of information on the Ontoly Registry that the Ontoly Program Rules require. You cannot withdraw consent to this processing while you hold an account or while our legal obligations subsist.

If you wish to withdraw your consent to other collection, use or disclosure of your Personal Information, please contact us using the contact information in the “How to Contact Us” section below. In some cases, withdrawal of your consent may mean that we can no longer provide certain products or services, maintain your account or your Project registration, or permit Platform Activities to continue. We will explain the consequences before giving effect to a withdrawal request.

Our Use of Cookies

A “cookie” is a small text file that contains information and is stored on your device. We use a limited set of cookies and similar technologies on our website and the Ontoly Platform. Optional cookies are set only where you have consented to them through our cookie consent popup, which appears before any optional cookie is placed and lets you accept all optional cookies, reject all of them, or consent to each category separately. Cookies that are strictly necessary — for example, to keep you signed in to the Ontoly Portal, to maintain session security and to protect against cross-site request forgery — are set whenever you use the authenticated Platform, because the service cannot function without them.

We do not use advertising, retargeting or social media tracking cookies or pixels, we do not use session replay technology, and we do not use your Personal Information to engage in interest-based or behavioural advertising of our services across third-party websites or service offerings. We honour the Global Privacy Control (GPC) and other opt-out preference signals that we are required to recognize.

You can withdraw or change your cookie consent at any time through the Cookie Preferences link in the footer of our website, which reopens the consent popup, and you can

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adjust your browser settings to deny or delete cookies. Withdrawing your consent does not affect the lawfulness of anything we did on the basis of your consent before you withdrew it. Some features of our website and the Ontoly Platform rely on strictly necessary cookies and will not work if you block them.

We do not use cookies or similar technologies to verify your identity or to collect identity documents; identity verification is described under "Identity Verification and Anti-Money Laundering Information" above and in the Know Your Customer (KYC) Policy.

Full details of the cookies we use, their purposes and their durations are set out in our **Cookie Policy**, which forms part of this Privacy Statement.

Opting Out of Communications

If you no longer want to receive marketing-related emails from us, you may opt out by clicking the "unsubscribe" link at the bottom of any marketing email you receive from us, or by contacting us directly using the contact information below. We will give effect to your request promptly and in any event within the time required by applicable law.

Please note that if you opt out of marketing emails, we will still send you communications about your use of our products or services. These include notices required or contemplated by the Ontoly Program Rules — for example, notices of amendments to the Platform Terms, Monitoring Report deadlines and reminders, validation and verification correspondence, Corrective Action Notices, transfer and retirement confirmations, invoices and receipts, security and breach notifications, and notices of suspension or termination. You cannot opt out of these operational and legal notices while you hold an account.

Retention of Personal Information

We use, disclose and retain your Personal Information only for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by applicable law. We apply the following retention periods and criteria:

- **Identity verification and financial-crime screening records** — including the record of the verification performed and its outcome, beneficial ownership declarations, address verification results, screening results and risk assessment notes — are retained for a minimum of seven (7) years from the date of account closure, in accordance with our KYC Policy. Where you have provided a government-issued identification document, we retain the record of the document type, issuing authority, document number and expiry date for that period, and we do not retain an image of the document after verification is complete.
- **Transaction records** relating to BERU issuance, purchase, sale, transfer, Retirement and cancellation are retained for a minimum of seven (7) years from the date of the transaction, including for terminated accounts.
- **Escalation Reports** prepared under our KYC Policy, and related assessments and supporting documentation, are retained for a minimum of seven (7) years from the date of the report, and are held separately from customer files with restricted access.

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- **Project source documents** — utility bills, meter exports, invoices and permits — are retained for a minimum of ten (10) years from the date of submission, consistent with Section 5A.1(f) of the Platform Terms.
- **Project and monitoring records** are retained for the duration of the Crediting Period, which may run for up to ten (10) years from the Project End Date, and thereafter for as long as necessary to support post-issuance review, audit and verification rights under Section 4.4 of the Platform Terms.
- **Ontoly Registry records** of BERU issuance, Disposition, Retirement and cancellation form part of the permanent audit trail of the BERS Program. They are retained for as long as necessary to preserve the integrity of the Program and to prevent double-counting and double-claiming, which in practice means they are retained on a long-term basis and are not routinely deleted.
- **BERU transaction records**, including purchase, transfer and fee payment records, are retained for a minimum of seven (7) years from the date of the transaction, consistent with our transaction record obligations. The associated **retirement record on the Ontoly Registry is permanent**.
- **Account, billing and correspondence records** are retained for the duration of the relationship and thereafter for the period required by applicable limitation, tax, accounting and audit requirements.

In determining retention in any particular case we also consider whether the information may be needed to establish, exercise or defend legal claims or in connection with an actual or anticipated investigation, audit, dispute or regulatory proceeding, and the sensitivity of the information and the risk of harm from unauthorized use or disclosure.

If your Personal Information was collected in connection with your use of our products and services, upon request by you within thirty (30) days after the effective date of termination or expiration of the applicable term, we will make Personal Information related to those products or services available to you. After that 30-day period we have no obligation to make it available, subject to your rights of access described below.

When Personal Information is no longer required for any of the purposes described above and no legal obligation requires us to keep it, we delete, destroy or irreversibly anonymize it.

International Transfer and Storage of Information

Your Personal Information may be stored and processed at our offices in Canada and at the premises of our service providers, screening providers and Verification Bodies, which are located in Canada, the United States of America and other jurisdictions in which those parties operate. Where your Project is located outside Canada, information relating to that Project may be processed in the jurisdiction in which the Project is located.

Other jurisdictions may have different data protection rules than Canada. While your Personal Information is outside of Canada, it is subject to the laws of the country in which it is located, and those laws may require disclosure of your Personal Information to authorities in that country. We use written contracts with our service providers requiring a comparable level of protection to that which applies in Canada, and, where the transfer is subject to

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European Economic Area or United Kingdom data protection law, the transfer mechanisms described in the Regional Supplement for those regions. For written information about our policies and practices regarding service providers outside of Canada, contact our Privacy Officer at the email address below.

Information Security

We maintain a written information security program with administrative, technical and physical safeguards that are appropriate to our size and complexity, the nature and scope of our activities, and the sensitivity of the information we hold. These safeguards are designed to protect Personal Information from loss or theft, and from unauthorized access, disclosure, copying, use or modification. Access to Personal Information is restricted to personnel with a business 'need-to-know' or whose duties reasonably require it, and identity verification and anti-money laundering records are subject to additional access restrictions. We require our service providers and contracted Verification Bodies to maintain comparable confidentiality and security obligations.

Despite these measures, no method of information transmission or storage is completely secure, and we cannot guarantee absolute security. Where a security breach involving Personal Information creates a real risk of significant harm, or where notification is otherwise required, we will notify affected individuals and the applicable regulators within the timeframes required by applicable law. Where a breach of Registry data security or integrity affects a CORSIA participant account holder, we will notify the affected account holder within seventy-two (72) hours of breach confirmation and inform the ICAO Secretariat, in accordance with BERS Standard Section 15.3.2.

As set out in Sections 2.6(b) and 3.2 of the Platform Terms, you are responsible for safeguarding your passwords and log-in credentials, you should use unique and strong passwords and not share them, and you must immediately notify us of any unauthorized use of your account or any security breach affecting it.

If you have reason to believe that your interaction with us is no longer secure, or that your Personal Information is no longer secure, please contact us immediately using the contact information below.

Automated Processing

Decisions about account opening and refusal, risk classification, Project registration and listing, verification outcomes, BERU issuance, enforcement action and account suspension or closure are not made solely by automated means. They involve review by Ontoly personnel and, where applicable, by our Compliance Officer or an independent accredited Verification Body.

We do use automated tools to support these processes, including data validation checks, standardized normalization methodologies applied to metered performance data, anomaly and transaction monitoring, and identity, sanctions and PEP screening. Screening tools may generate potential matches that require human review before any action is taken; a potential match is never treated as conclusive without that review. Where you have a right under applicable law to object to a decision based solely on automated processing, or to obtain human review of such a decision, you may exercise it by contacting us as described below.

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Rights Regarding Personal Information

We expect you to supply us with updates to your Personal Information when required. This includes your obligation under Section 11.1(a) of the Platform Terms to update your Account Purpose Declaration within fifteen (15) Business Days of any material change, and your obligation under our KYC Policy to confirm at each review that the information we hold remains accurate, and to provide refreshed documentation where information has changed or a document has expired.

Individuals have a number of rights concerning their Personal Information under privacy laws. Under certain conditions, you may make a written request to review Personal Information about you that we have collected, used or disclosed, and we will provide it to the extent required by applicable law. You may also challenge the accuracy or completeness of your Personal Information in our records. If you demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend it as required.

We may require sufficient identification to fulfill your request. Any identifying information provided for this purpose will be used only for this purpose. We will not charge you any fees to access your Personal Information in our records without first providing you with an estimate of the approximate fees, if any.

Under some privacy laws, you may be entitled to additional rights, including: (i) the right to withdraw consent to processing where consent is the basis of processing; (ii) the right to access your Personal Information and certain other supplementary information; (iii) the right to object to unlawful data processing; (iv) the right to erasure of Personal Information about you; (v) the right to demand that we restrict processing; (vi) the right to data portability in a structured, commonly used, and machine-readable format; (vii) the right to object to decisions taken by automated means which produce legal effects concerning you or similarly significantly affect you; and (viii) the right to lodge a complaint with a data protection authority. Each of these rights applies only under the conditions set out in the applicable law.

Limits on these rights. These rights are not absolute. Applicable law or regulatory requirements allow or require us to refuse to provide some or all of the Personal Information we hold about you, or to decline a correction or deletion request. These situations include, without limitation, where the request would:

- reveal Personal Information about, or Confidential Information of, another Account Holder, a beneficial owner, a Building Owner, a counterparty or a Verification Body;
- reveal that we have made, are considering making, or have been asked about a disclosure to a regulator, sanctions authority or law enforcement agency — where a court order, production order or sanctions reporting requirement prohibits disclosure, we will refuse the request without stating the reason and will notify the applicable privacy commissioner where required to do so;
- reveal the details of our financial-crime risk assessment methodology, screening criteria or investigative techniques, or otherwise prejudice the detection and prevention of money laundering, terrorist financing, sanctions evasion or fraud;
- reveal Tier 1 Data, verification working papers, verification opinions, or our proprietary quantification models, methodologies or standards;

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- compromise an ongoing investigation, audit, enforcement action or legal proceeding, or be subject to solicitor-client or litigation privilege; or
- require us to alter, delete or withhold information that we are required to publish or retain under the Ontoly Program Rules or applicable law, or that is necessary to preserve the integrity of the Ontoly Registry, including issuance, Disposition, Retirement and cancellation records and mandatory anti-money laundering retention periods.

Where we cannot accommodate your request, we will inform you of the reasons, subject to any legal or regulatory restriction on doing so, and we will tell you how to challenge that decision.

You may also raise a concern through the BERS Program grievance and appeals mechanism described in Section 2.4 of the BERS Standard, by writing to info+grievances@ontoly.org. No fee is charged for use of that mechanism.

If you object to how we have handled your request, you may make a complaint to the Office of the Information and Privacy Commissioner for British Columbia or to the Office of the Privacy Commissioner of Canada. If you reside in the United States, you may also contact the Attorney General of your state. If you reside elsewhere, you may contact the privacy or data protection authority in your jurisdiction.

How to Exercise Your Rights

Where to send a request. Email **info+info+privacy@ontoly.org** with the subject line "Privacy Request", or write to our Privacy Officer at the address below. Tell us what you want (access, correction, deletion, a copy of your data, withdrawal of consent, or something else), and give us enough detail to find your records — your name, the email address associated with any account, and the approximate dates involved.

You do not need an account to make a request. If your details reached us from someone else, or you no longer hold an account, write to us the same way.

Verifying who you are. Before we act on a request we will confirm your identity, using information already in our possession wherever we can. For a sensitive request — deletion, or a copy of identity verification records — we may ask for more. Anything you send us for verification is used only for that purpose and then deleted.

Authorized agents. Someone may make a request on your behalf. We will ask for written proof of their authority and will verify your identity separately.

How long we take. We acknowledge requests promptly and respond within **30 days** under Canadian privacy law and within **45 days** under US state privacy laws. Where a request is complex or we have received several from you, we may extend once, and will tell you within the original period if we do.

If we say no. We will tell you why, unless the law prevents us from doing so, and we will tell you how to challenge the decision. You may ask our Privacy Officer to review it, and you may complain to a regulator — see "Rights Regarding Personal Information" above.

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No charge, no penalty. We do not charge for a request unless it is manifestly unfounded or repetitive, and we will always give you an estimate before charging anything. We will not treat you differently, degrade your service, or close your account because you exercised a right.

Regional Supplement — European Economic Area and United Kingdom

This section applies where the General Data Protection Regulation (EU) 2016/679 ("**EU GDPR**") or the UK General Data Protection Regulation and the *Data Protection Act 2018* ("**UK GDPR**") applies to our processing of your Personal Information, which will generally be the case where you are in the European Economic Area or the United Kingdom and you use the Sites or hold an Ontoly Portal account.

Controller. 1483124 BC Ltd. dba Ontoly is the controller of the Personal Information described in this Privacy Statement, except where this Privacy Statement states that another party acts as controller of its own records.

Our representative. Our representative for the purposes of Article 27 of the EU GDPR, and our representative for the purposes of the UK GDPR, are identified on our website at www.ontoly.org. You may contact either of them, or our Privacy Officer at info+privacy@ontoly.org, in relation to any matter arising under this section.

The legal bases we rely on. We process Personal Information on the following bases:

- **Performance of a contract** — to open, maintain and administer your account; to register and administer your Project; to issue, transfer, Retire and cancel BERUs; to record your BERU purchases and collect our fees; and to provide support.
- **Compliance with a legal obligation** — to carry out sanctions screening, to freeze and report where sanctions law requires it, and to retain records where law requires their retention.
- **Legitimate interests** — to verify identity and assess financial-crime risk beyond what law strictly requires; to publish the information the BERS Program requires on the Ontoly Registry in order to maintain a credible, independently auditable carbon crediting programme and to prevent double-counting and double-claiming; to secure, monitor and improve the Sites and Services; to investigate suspected breaches and take enforcement action; and to establish, exercise or defend legal claims. Where we rely on legitimate interests we have assessed those interests against your interests, rights and freedoms, and you may object as described below.
- **Consent** — for optional cookies, for marketing communications where consent is required, and where we otherwise ask for it. You may withdraw consent at any time, and withdrawal does not affect the lawfulness of processing carried out before withdrawal.

Publication on the Ontoly Registry. Publication of the information described under "Public Disclosure Through the Ontoly Registry" is carried out on the basis of our legitimate interests in operating a credible and auditable carbon crediting programme, and not on the basis of your consent. **Before you name an individual as a Retirement beneficiary, you should understand that the name will be published on a public database, will be downloadable in bulk, and cannot afterwards be removed from the historical record.** You may object to that

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publication on grounds relating to your particular situation, and we will consider the objection and cease publication unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims. Where we cannot remove a record without compromising the integrity of the Registry, we will consider whether the Personal Information it contains can be minimized, and we will tell you the outcome and the reasons for it.

Your rights. In addition to the rights described under "Rights Regarding Personal Information", you have the right to access your Personal Information; to have inaccurate information rectified; to erasure in the circumstances the law provides; to restrict processing; to data portability in respect of information you provided to us and which we process by automated means on the basis of consent or contract; to object to processing carried out on the basis of legitimate interests, including profiling; and not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you. As described under "Automated Processing", we do not make such decisions solely by automated means.

Retention. We retain Personal Information for the periods described under "Retention of Personal Information". Where a retention period is expressed as a minimum, we retain the information only for as long as one of the purposes described in this Privacy Statement continues to apply, and we then delete, destroy or irreversibly anonymize it.

International transfers. We are established in Canada, and your Personal Information is transferred outside the European Economic Area and the United Kingdom. Transfers to Canada in respect of processing subject to Canada's *Personal Information Protection and Electronic Documents Act* are made on the basis of the adequacy decisions in force for Canada. Transfers to our service providers in the United States and elsewhere are made on the basis of the European Commission's Standard Contractual Clauses, or the United Kingdom's International Data Transfer Agreement or Addendum, together with an assessment of the transfer and any supplementary measures required. You may request a copy of the safeguards we rely on by contacting our Privacy Officer.

Complaints. You may lodge a complaint with the supervisory authority in the European Economic Area member state of your habitual residence, place of work or the place of the alleged infringement, or, in the United Kingdom, with the Information Commissioner's Office. You may also complain to us first at info+privacy@ontoly.org, and we would prefer the opportunity to resolve the matter with you.

Regional Supplement — Quebec

If you are in Quebec, the *Act respecting the protection of personal information in the private sector* gives you additional rights, and we confirm the following:

- **Person in charge.** Our Privacy Officer is the person in charge of the protection of personal information within Ontoly, and can be reached at info+privacy@ontoly.org.
- **Outside Quebec.** As described under "International Transfer and Storage of Information", your information may be communicated outside Quebec, including to

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Canada outside Quebec and to the United States. We assess each transfer and use written contracts requiring comparable protection.

- **Automated decisions.** As described under "Automated Processing", we do not make decisions about you based exclusively on automated processing. If that ever changes, we will tell you at the time of the decision and you may submit observations and ask for the decision to be reviewed by a person.
- **Portability.** You may ask us for the computerized personal information you provided to us, in a structured, commonly used technological format.
- **Cessation of dissemination and de-indexing.** You may ask us to stop disseminating your personal information, or to de-index a link to it, where the dissemination contravenes the law or a court order. This right is limited in respect of information the BERS Program requires us to publish, as explained under "Public Disclosure Through the Ontoly Registry".
- **Complaints.** You may complain to the Commission d'accès à l'information du Québec.

Third Party Websites and Services

We may provide links to third-party websites for your convenience and information. We may also make opportunities available to you to purchase, subscribe to, or use other products or services from third parties with different privacy practices, including Verification Bodies, energy benchmarking tools such as ENERGY STAR Portfolio Manager, utility data providers, exchanges, brokers and Financial Market Settlement Systems. Those websites, products and services are governed by the privacy statements and policies of the respective third party. This Privacy Statement does not extend to them. We do not assume responsibility for the privacy practices of these third parties and we encourage you to review their privacy statements before using their websites, products or services.

Children

Our products and services are directed to businesses and to individuals acting in a commercial or investment capacity, and are not directed to children. We do not knowingly collect Personal Information from anyone under the age of 18, and we do not knowingly collect Personal Information from children under 13. If you believe we have inadvertently collected Personal Information from a child, please contact us using the contact information below and we will take steps to delete it.

Governing Law

Consistent with Section 18.10 of the Platform Terms, this Privacy Statement is governed by and construed in accordance with the laws of the Province of British Columbia and the laws of Canada applicable therein. Nothing in this Privacy Statement limits any mandatory right or remedy available to you under the privacy laws of your own jurisdiction of residence, and where the law of your jurisdiction of residence applies to our processing of your Personal Information, that law applies in addition to this Privacy Statement.

How to Contact Us

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All comments, questions, concerns or complaints regarding your Personal Information or our privacy practices, and all requests to exercise your rights, should be sent to our Privacy Officer as follows:

By e-mail:	info+privacy@ontoly.org
Address:	Attention: Privacy Officer 1483124 BC Ltd. dba Ontoly B3787 Garibaldi Highlands PO Squamish, BC Canada V0N 1T0

We will acknowledge your request promptly and respond within the time required by applicable law.

Notices given under the Platform Terms should be directed to info@ontoly.org or through your Ontoly Platform account, in accordance with Section 2.7 of the Platform Terms.

Supplemental Notice for US Residents

Scope of this Notice

This section provides additional information required by certain US state privacy laws, including the California Consumer Privacy Act as amended by the California Privacy Rights Act, the Virginia Consumer Data Protection Act, the Colorado Privacy Act, the Connecticut Data Privacy Act, the Utah Consumer Privacy Act, and comparable laws in other states, in each case as amended from time to time (collectively, "**US Consumer Privacy Laws**"). It applies to the extent a US Consumer Privacy Law applies to our processing of your Personal Information. Where it does not apply, the rest of this Privacy Statement governs.

Categories of Personal Information Collected

In the preceding twelve months we may have collected the following categories of Personal Information, depending on how you engage with us:

Category	Examples	Sources
Identifiers	Name, postal address, email address, phone number, account name, IP address, identification document numbers where provided Y	u; screening and verification providers; public registries
Customer records and financial information	Bank account and payment card details, billing records, payment history, source-of-funds documentation	You; payment processors
Commercial information	Records of Platform Activities, Project registrations, BERU holdings, Dispositions, Retirements and cancellations	You; the Ontoly Platform
Professional or employment-related	Role, title, employer, Account Purpose Declaration, beneficial ownership and	You; corporate registries

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Category	Examples	Sources
information	director information	
Internet or network activity	Browser and device type, operating system, log data, pages viewed	Your device; our analytics provider
Geolocation-related information	Address of Project premises; jurisdictions in which you operate	You; public registries
Audio and visual information	Records of the outcome of identity verification conducted by video conference Yo	
Sensitive personal information	Identification document numbers where provided, account log-in credentials, financial account information Yo	; screening and verification providers
Inferences	Financial-crime risk classification; user interests and preferences	Derived by us

We retain each category for the periods described in "Retention of Personal Information" above.

Purposes of Collection

We collect and use each of the above categories for the purposes described in "How We Use Your Personal Information", which include operating the BERS Program and the Ontoly Platform; identity verification and financial-crime prevention; Project registration, verification and BERU administration; billing and collections; publishing required information on the Ontoly Registry; security, audit and enforcement; customer support; service improvement and research using de-identified data; marketing where permitted; and compliance with legal obligations.

Disclosure of Personal Information

In the preceding twelve months we may have disclosed each of the above categories for business purposes to the categories of recipients described in "How We Share Your Personal Information", namely identity verification and screening providers, Verification Bodies, service providers, transaction counterparties and prospective buyers, financial market settlement systems, regulators and law enforcement, professional advisers, and — for the limited categories described in "Public Disclosure Through the Ontoly Registry" — the public.

No Sale or Sharing of Personal Information

We do not sell your Personal Information for money or other valuable consideration, and we do not share it for cross-context behavioural or targeted advertising. In the preceding twelve months we have not sold Personal Information, and we have not shared Personal Information for cross-context behavioural advertising, as those terms are defined under the US Consumer Privacy Laws. We do not sell or share the Personal Information of minors under 16.

Your Rights

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Subject to the limits described in "Rights Regarding Personal Information" above, consumers in the United States may request the following:

Right to know and access. You may request the categories and specific pieces of Personal Information we have collected about you, the categories of sources, the business or commercial purposes for collection, and the categories of third parties to whom we disclosed it, together with a portable copy of your Personal Information.

Right to correct. You may request that we correct inaccurate Personal Information about you.

Right to delete. You may request that we delete Personal Information we have collected from you. We will decline this request to the extent the information is necessary to complete a transaction, provide a service you requested, detect or prevent fraud or other illegal activity, comply with a legal obligation — including anti-money laundering record-retention requirements — or maintain the integrity of the Ontoly Registry.

Right to opt out of sale, sharing and targeted advertising. Because we do not sell or share Personal Information for targeted advertising, there is nothing to opt out of. We nonetheless honour the Global Privacy Control and other opt-out preference signals we are required to recognize.

Right to limit the use of sensitive personal information. We use sensitive personal information only for the permitted purposes described above, and not to infer characteristics about you. You may nonetheless submit a request to limit, which we will honour except where the information is necessary for a permitted purpose.

Right to opt out of profiling. You may request that we opt you out of profiling in furtherance of decisions producing legal or similarly significant effects. As described in "Automated Processing", we do not make such decisions solely by automated means.

Right of non-discrimination. We will not discriminate against you for exercising any of these rights.

How to Submit a Request

Submit a request using the contact details in "How to Contact Us" above. You may use an authorized agent to submit a request on your behalf, in which case we may require written proof of the agent's authority and separate verification of your own identity. We will verify your identity before acting on a request, using information already in our possession where possible.

We will respond within 45 days of receipt, and may extend that period by a further 45 days where reasonably necessary, in which case we will notify you within the initial period.

Appeals

If we decline your request, you may appeal by writing to our Privacy Officer at info+info+privacy@ontoly.org with the subject line "Privacy Request Appeal". We will respond to the appeal within the period required by applicable law and will explain the reasons for our decision. If your appeal is denied, you may contact the Attorney General of your state to submit a complaint.

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