PRIVACY POLICY

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1. Introduction

Velora Group Ltd (Company No. 2217964) ("**Velora**", "**we**", "**our**", "**us**") is a company incorporated in the British Virgin Islands under the BVI Business Companies Act, 2004. Velora is the holding company of a group of companies (each company that is, from time to time, a direct or indirect subsidiary of Velora, a "**Group Company**").

This Privacy Policy describes how we collect, use, disclose and protect Personal Data (as defined below) in connection with the website on which this Privacy Policy is published (the "**Website**"), enquiries made to us and our business as a holding company. We are the data controller of the Personal Data we collect, and we handle it in accordance with the Data Protection Act, 2021 of the Virgin Islands ("**DPA**").

Where the EU General Data Protection Regulation ("**GDPR**") or another data protection law applies to a particular activity (for example, where we offer services to, or monitor the behaviour of, individuals in the European Union), we will also comply with its applicable requirements.

Each Group Company is responsible for the Personal Data it processes in connection with its own website and services, as described in its own privacy policy.

In this Privacy Policy, ***Personal Data*** has the meaning given to "personal data" in the DPA and, in general terms, means information that relates directly or indirectly to an individual who is identified or identifiable from that information, or from that and other information in our possession.

The latest Privacy Policy is published on the Website and is available free of charge.

2. Personal Data we collect

We may collect Personal Data relevant to enquiries, our business and our business relationships, including:

- identification, professional and contact information, such as your name, job title, company name, address, email address and telephone number;
- information relating to your enquiries, including the Group Company and markets you are interested in, the nature of your enquiry and our communications with you;
- information required to establish, administer or fulfil a business relationship with us, including billing and payment information where applicable;
- information provided in connection with a job application or engagement with us;
- technical and usage information collected through the Website, where applicable; and
- any other Personal Data that you provide to us or that is reasonably necessary for the purposes described in this Privacy Policy.

Please do not provide us with sensitive personal data (such as information about your physical or mental health, sexual orientation, political opinions, religious or similar beliefs, or criminal

convictions or alleged offences) unless we specifically request it. Where we need to process sensitive personal data, we will do so only with your explicit consent or as otherwise permitted under section 20 of the DPA.

3. How we collect Personal Data, and our lawful basis

We generally collect Personal Data directly from you through the Website contact form, correspondence and other interactions with us.

We may also collect Personal Data from our Group Companies, your employer or colleagues, business partners and service providers, and from publicly available sources.

Information marked as required in our forms is necessary for us to respond to your enquiry. If you do not provide it, we may be unable to respond to your enquiry or to refer it to the relevant Group Company. Other information is provided on a voluntary basis.

In accordance with section 7 of the DPA, we process Personal Data with your express consent or where the processing is necessary: for the performance of a contract to which you are a party, or for taking steps at your request with a view to entering into a contract; for compliance with a legal obligation to which we are subject; to protect your vital interests; for the administration of justice; or for the exercise of any functions conferred by law. We process Personal Data only for lawful purposes directly related to our activities, and only to the extent that it is adequate but not excessive in relation to those purposes.

Where we process Personal Data with your consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out before it.

Where the GDPR applies, we process Personal Data on one or more of the following legal bases: your consent; the performance of a contract with you, or steps taken at your request before entering into a contract; compliance with a legal obligation; or our legitimate interests (such as responding to enquiries, managing our business relationships, and operating and improving the Website), where those interests are not overridden by your interests or fundamental rights and freedoms.

4. Why we collect Personal Data

We use and disclose Personal Data for the following purposes:

- to respond to your enquiries and, where relevant, refer them to the appropriate Group Company;
- to manage our relationships with business partners, service providers and other business contacts;
- to carry out our functions as a holding company, including group management, governance, reporting and coordination with our Group Companies;
- to consider concerns or complaints;
- to comply with applicable laws and regulatory obligations;
- where relevant, to conduct identity verification, due diligence, sanctions screening, fraud prevention and other compliance and risk management activities;
- to manage recruitment and our relationships with employees and contractors;

- subject to your consent, or where otherwise permitted by law, to send you communications about our Group Companies, their services, news or events;

- to maintain, secure and improve the Website; and

- for any other purpose to which you have consented, or that is otherwise permitted or required by law.

We will not use or disclose Personal Data for any purpose other than the purpose for which it was collected, or a directly related purpose, without your consent, unless otherwise permitted under the DPA.

5. Who we share Personal Data with

We may disclose Personal Data, where relevant, to the following classes of third parties:

- our Group Companies, for example to enable the relevant Group Company to respond to your enquiry or to provide its services;

- agents, contractors and service providers that we engage to carry out our functions and activities, including website hosting, cloud storage, IT, communications, design and development providers, and our lawyers, accountants, auditors and other professional advisers;

- business partners, where relevant to your enquiry;

- organisations involved in a transfer or sale of all or part of our assets, shares or business;

- financial institutions and payment service providers, where relevant;

- regulatory bodies, government agencies, law enforcement bodies and courts; and

- anyone else to whom you authorise us to disclose it or where disclosure is required or permitted by law.

Where a Group Company receives your Personal Data to respond to your enquiry, that Group Company is responsible for its handling of that Personal Data under its own privacy policy and applicable law.

Where a service provider processes Personal Data on our behalf, we require it to provide sufficient guarantees in respect of the technical and organisational security measures governing the processing, and we take reasonable steps to ensure compliance with those measures. We do not sell Personal Data.

6. Transfers outside the British Virgin Islands

Our Group Companies and service providers are located outside the British Virgin Islands. Personal Data we collect will therefore generally be transferred to, stored in or accessed from jurisdictions outside the British Virgin Islands.

In accordance with section 7(1)(c) of the DPA, we transfer Personal Data outside the British Virgin Islands only where there are adequate data protection safeguards, such as written contracts containing data protection terms, or with your consent. Where we rely on your consent, we will ask for it when we collect your Personal Data, for example through the Website contact form.

Where the GDPR applies, we transfer Personal Data outside the European Economic Area only where the recipient country is the subject of an adequacy decision of the European Commission or appropriate safeguards are in place, such as the European Commission's standard contractual clauses.

7. Security of Personal Data

In accordance with section 10 of the DPA, we take practical steps to protect Personal Data from loss, misuse, modification, unauthorised or accidental access or disclosure, alteration or destruction. However, no method of transmission over the internet or of electronic storage is completely secure.

8. Cookies

The Website may use cookies, which are small text files transferred to your device when you visit a website. These may include cookies necessary for the Website to function and, where used, non-essential cookies such as analytics, performance or marketing cookies. We will request your consent before placing non-essential cookies on your device where required by applicable law.

Where cookies collect or process Personal Data, we will handle that Personal Data in accordance with the DPA and this Privacy Policy. You can use your browser settings to accept, refuse or delete cookies; if you do so, some features of the Website may not be available.

9. Data breaches

We take steps to detect, contain and respond to data breaches involving Personal Data. Where a data breach is likely to result in harm to affected individuals, we will take appropriate steps, which may include notifying the affected individuals and relevant authorities, and we will comply with any notification requirements under applicable law.

10. Direct marketing

We will send you marketing communications only with your consent or where otherwise permitted by law. You may at any time, by notice in writing to us (including by using the unsubscribe facility provided in a marketing message), require us to stop, or not to begin, processing your Personal Data for direct marketing purposes. In accordance with section 21 of the DPA, we will comply with your notice within three days of receiving it and notify you in writing.

11. Retention and accuracy of Personal Data

In accordance with section 11 of the DPA, we keep Personal Data only for as long as is necessary for the fulfilment of the purposes for which it was collected, including to comply with legal, accounting and reporting obligations and to maintain business and correspondence records. When Personal Data is no longer required, we take reasonable steps to destroy or permanently delete it.

In accordance with section 12 of the DPA, we take reasonable steps to ensure that Personal Data is accurate, complete, not misleading and up to date. Please let us know if any Personal Data you have provided to us changes.

12. Your rights

Subject to the DPA, you may:

- **request access** to your Personal Data by written request. We will inform you within thirty days after receiving your request whether access will be given. We may extend this period where permitted under the DPA, in which case we will notify you in writing. We may require information to verify your identity and locate the Personal Data, and may charge any fee prescribed under the DPA;
- **request correction** of Personal Data that is incomplete, incorrect, misleading, excessive or not relevant, by written application specifying the Personal Data concerned, the reasons for your request and the correction requested;
- **withdraw your consent** to our processing of your Personal Data at any time. We will inform you of the likely consequences, for example that we may be unable to respond to your enquiry; and
- **require us to stop** processing your Personal Data for direct marketing purposes, as described in section 10.

If we refuse a request for access or correction, we will notify you in writing of the reasons and of your right to complain to the Information Commissioner.

Where the GDPR applies, you may also have the right to request erasure of your Personal Data, restriction of its processing or data portability, and to object to its processing, in each case subject to the conditions and exceptions in the GDPR. Where another applicable data protection law gives you additional rights, you may contact us to exercise them.

Where your request concerns Personal Data held by a Group Company in connection with its own services, we may refer your request to that Group Company.

13. Children

The Website is intended for businesses and professionals. We do not knowingly collect Personal Data from individuals under the age of 18. If we become aware that we have collected such Personal Data, we will take reasonable steps to delete it.

14. Complaints and contact

If you have any questions about this Privacy Policy or wish to make a request or complaint about how we have handled your Personal Data, please contact:

Velora Group Ltd

Registered office: Wickhams Cay II, Road Town, Tortola, VG1110, British Virgin Islands

Email: info@veloragroupltd.com (please use the subject line “Data Protection”)

If you are not satisfied with our response, you may lodge a complaint with the Office of the Information Commissioner of the Virgin Islands. Where the GDPR applies, you also have the right to lodge a complaint with a data protection supervisory authority, in particular in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

15. Updates to this Privacy Policy

We will review this Privacy Policy from time to time to reflect changes in laws, technology and our operations. The current version will be published on the Website. Where required by law, we will provide further notice or obtain consent for material changes to our handling of Personal Data.