

# Data Protection Policy

# Cardano Development Data Protection Policy

**Updated Date: May 2023**

## **Approved by: Cardano Development Managing Board**

Audience: Stichting Cardano Development, Cardano Development, All Cardano Development Companies and Frontier Finance Solutions

Custodian: Senior Counsel

## **1. Introduction**

Cardano Development Group and its companies are committed to protect the privacy of and security of their clients, partners, employees, contractors and agents personal information in accordance with General Data Protection Regulation (GDPR) (EU) (2016/679).

"Personal data" or "personal information" means any information about an individual from which that individual can be identified.

## **2. Responsibility**

This policy (the Data Policy) applies to all employees, directors, contractors, and agents ("Personnel") of Stichting Cardano Development, Cardano Development B.V., Frontier Finance Solutions B.V. and all subsidiaries controlled directly or indirectly by Frontier Finance Solutions B.V. (in this document hereafter collectively referred to as "CD" or the "CD Companies" and each, a "CD Company").

Cardano Development expects the managing boards of all of its affiliates to either

- (a) adopt the policy as stated herein; or
- (b) if required to address a need particular to that affiliate, adopt an alternative policy with substantially similar intent.

## **3. Data Protection Principles**

CD is committed to processing data in accordance with its responsibilities under Data Protection Act. Under GDPR, CD is the data controller and such determines the purpose and the manner in which, any personal data is/ or will be processed. CD ensures that it will:

- Lawfully, fairly and transparently process personal data and will use its logos on the documents, state the intention of processing the data and state it, and whom it intends to share personal data;
- Process the Data for limited purposes and will not use the Data for a purpose other than those agreed by the data subjects. If the data held by CD is requested by an external organization, it will only be shared if agreed by the data subject. External organizations must state the purpose for requesting the data;

- Hold adequate, relevant and not excessive data. CD will monitor the purpose of data held for its purposes, ensuring it holds neither too much nor too little data in respect of the individuals about whom the data is held. If data provided for an intended purpose deemed excessive, it will be immediately permanently deleted and/or destroyed;
- Hold accurate and where necessary up to date data. It is the responsibility of individuals and/or organizations to ensure data held by CD is accurate and up to date. Verbal confirmation will also be accepted as confirmation that current data held is accurate. It is the responsibility of the data subject to notify CD for their data to be updated. Upon notification, It is the responsibility of CD to ensure all relevant data has been updated.
- Store data only as long as it is necessary. CD discourages retention of data for longer than it is required;
- Process data in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing against accidental loss, destruction or damage, using appropriate technical or organization measures.
- Keep all data secure. Appropriate technical and organizational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of data. CD uses multiple factor authentication for their personnels to be able to log into the CD systems. CD has a comprehensive Information Technology and Cyber Security Policy and Procedures which all personnel are required to adhere with,
- Any hard copies of personal or financial data is kept in a locked filing cabinet and can only be accessed by authorized CD personnel.

## 4. What Information We Collect About You

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender. This may also include images (such as copies of passports or CCTV images) and photographs, films and video recordings which may be taken at special events organised or attended by CD.

- Contact Data includes postal address, email address and telephone numbers.
- Technical Data including internet protocol (IP) address, your 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 to access our website. Security data such as passwords or memorable information is always encrypted and cannot be accessed by us.
- Profile Data includes your username and password, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing and other information from us and our third parties and your communication preferences.

We may also process certain **Special Categories** of information for specific and limited purposes, such as detecting and preventing any form of abuse, if it is in the wider public interest (for example, to protect individuals' well-being) or to make our services accessible. We will only

process special categories of information where we have obtained your explicit consent or are otherwise lawfully permitted to do so. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## 5. How Do We Collect Your Information

We use different methods to collect information from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - apply for financing for a project
  - apply for a job with us
  - submit a response to an invitation to tender (or equivalent)
  - subscribe to our service or publications or give us some feedback or submit a complaint.
- Information that we learn about you through our relationship with you.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns which may include personal information. We collect this information by using cookies, and other similar technologies. Please see our Cookie Policy for further details.
- **CD Stakeholders:** we may receive personal information about you from other CD Companies, that provide our funding, or we provide funding to.
- **Third parties or publicly available sources.** We may receive personal information about you from various third parties and public sources including: analytics providers
  - advertising networks or search information providers
  - data brokers or aggregators.
- Know your client ("KYC") and due diligence. We may carry out KYC and other due diligence checks on potential employees, directors or officers, contractors, clients and suppliers.

## 6. How We Use Your Information

We will only use your personal information for the purposes for which we collected it. The main purposes for which we use your information are as follows:

- For procurement and recruitment purposes
- To contract with you
- To manage our relationship with you which will include notifying you about changes to our terms or Privacy Notice
- To administer and protect our business
- To improve our website, products/services, marketing, customer relationships and experiences
- To make suggestions and recommendations to you about services that may be of interest to you

- To keep you informed about CD and CD companies when you subscribe to our newsletter
- To process and respond to your enquiry, application or complaint, for example, in respect of an investment proposal, working for CD or providing products or services to CD and CD companies.

We may use your information for another reason where we reasonably consider that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## 7. Legal Bases We Rely On Your Information

The data protection legislation allows us to use your personal information for a range of reasons, known as the “legal bases”. These include:

- **Consent:** where you have consented to our use of your information for a specific purpose.
- **Contract performance:** where your information is necessary to enter into or perform our contract with you (or to take steps at your request before entering into such a contract).
- **Legal obligation:** where we need to use your information to comply with our legal and regulatory obligations.
- **Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- **Vital interests:** in rare situations it may be necessary to use your information to protect someone’s life.
- **Public interest:** there may be times when we need to share your personal information to perform a task in the public interest.

Most commonly, we rely on the following legal basis to use your personal information:

- to perform the contract, we are about to enter into or have entered into with you.
- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing information and communications to you. You have the right to withdraw consent to this at any time by contacting us.

## 8. Who We Share the Information With

We may share your personal information with:

- Other companies within our group who provide products or services that you may require or who may be interested in your products or services.
- Third parties providing services to us, such as market analysis and benchmarking, agents and subcontractors acting on our behalf.
- Social media companies (in a secure format) or other third-party advertisers (subject to your consent) so they can display relevant messages to you and others about us and our activities.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **9. Transfer Of Data Subjects Information Outside The EU**

CD may share data subjects information within CD group and with other organizations. This may involve transferring information outside the EU as some of the companies are domiciled in other jurisdictions. Whenever CD transfers any personal information out of the EU, CD ensures a similar degree of protection is offered to it by ensuring at least one of the following safeguard is implemented:

- CD only transfers personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- CD uses specific contract clauses approved for use in the EU which give personal information the same protection it has in the EU.

## **10. How We Keep Your Information Secure**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

## **11. How Long We Keep Your Information**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please contact us if you would like more information about how long we keep your information.

## 12. Rights Of Data Subject

Under certain circumstances, data subjects have rights under data protection laws in relation their personal data. These include the right to:

- **Request access** to personal information (commonly known as a “data subject access request”). This enables data subject to receive a copy of the personal information CD holds about and to check that CD are lawfully processing it.
- **Request correction** of the personal information that CD holds. This enables data subject to have any incomplete or inaccurate information CD hold to be corrected, though CD may need to verify the accuracy of the new data provide by the data subject.
- **Request erasure** of personal information. This enables data subject to ask CD to delete or remove personal information where there is no good reason for CD continuing to process it. Please note, however, that CD may not always be able to comply with this request of erasure for specific legal reasons which will be notified, if applicable, at the time of the request.
- **Object to processing** of data subjects personal information where CD is relying on a legitimate interest (or those of a third party) however, based on data subjects particular situation, it is causing you damage or distress or impacts data subjects rights. In some cases, CD may demonstrate that CD have compelling legitimate grounds to process data subjects information which override data subjects rights and freedoms.
- **Request restriction** of processing of personal information. This enables data subject to ask CD to suspend the processing of data subjects personal information in the following scenarios:
  - a) if you want CD to establish the data’s accuracy;
  - b) where CD use of the data is unlawful, but data subject does not want CD to erase it;
  - c) where data subject needs CD to hold the data even if CD no longer require it as data subject needs it to establish, exercise or defend legal claims; or
  - d) data subject have objected to CD’s use of their data, but CD needs to verify whether CD have overriding legitimate grounds to use it.
- **Request the transfer** of personal information to data subject or to a third party, in a structured, commonly used, machine-readable format. This right only applies where CD process data subjects personal information by automated means for contractual purposes or with data subjects consent.
- **Withdraw consent** at any time where CD is relying on consent to process data subjects personal information. If data subject withdraws their consent, CD may not be able to provide certain products or services to. CD will advise data subject if this is the case at the time of withdraw of consent.

## 13. Managing Data Protection

Cardano Development’s Senior Counsel has been appointed as dedicated Data Protection Officer.

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