

SunContract Website Privacy Policy

We appreciate your interest in our products and services and your visit to this Website. Your privacy is important to us and we want you to feel comfortable with how we use and share your personal information.

SunContract OÜ, incorporated and registered in Estonia with an entity number reg. no. 14856791 and address Harju maakond, Tallinn, Lasnamäe linnaosa, Valukoja tn 8/1, 11415, Estonia (“**SunContract**” or “**we**”) and its present and future affiliates are committed to protecting and respecting your privacy.

This Privacy and Cookie Policy (“**Privacy Policy**” or “**Policy**”) sets out the basis on which any personal data you as a user of the **SunContract** website, available at <https://suncontract.org/> (“**Website**” or “**Site**”) (“**User**” or “**you**”) provide to us, will be used, processed or disclosed by us. Personal data or personal information means any information that directly or indirectly identifies you as an individual. In this Privacy Policy, we use “personal data” and “personal information” as synonyms.

This Privacy Policy is effective upon the date of its publication on the Website and is legally binding. By accessing or using the Website, its features or any services through it (“**Services**”), you accept this Privacy Policy and agree to comply with its terms. Please read the following Privacy Policy carefully to understand our views and practices regarding your personal data and how we treat it. If you do not agree with this Policy, or you do not have the right, power, or authority to act on behalf of and bind the business, organization, or other entity you represent, do not access or otherwise use the Website.

We reserve the right at our sole discretion to amend, modify or supplement this Privacy Policy at any time to reflect necessary changes in the applicable law or our business practices.

1. **Consent for processing personal information**

- 1.1. By providing your personal data, you are granting consent for its processing. Furthermore, you explicitly acknowledge and agree that we may process your personal data for our legitimate interests, such as safeguarding SunContract, its users, customers, clients, and other entities' property, rights, or safety.

2. **Purpose of collecting information**

- 2.1. The primary purpose in collecting personal data is to provide you with a secure, smooth, efficient, and customized experience. We use your personal data to provide Services to you on the Website or to comply with our legal obligations or with your consent.
- 2.2. We will use your information for any other purpose only on receiving your consent and then, only for the purpose(s) for which grant consent unless we are required to do otherwise by law.

3. **Information we collect**

- 3.1. Users who simply visit the Website are not required to provide any personal information. The acquired information in such cases might include the IP address, the date, the time and the type of browser. This data is not sufficient to identify the User; however, it may be used to improve our Website, its products and Services or their presentation.

- 3.2. For the purposes of subscription to our newsletter, we might ask you to provide us with your valid email address. The purpose of collecting this data is to provide you with a secure, smooth, efficient, and customized experience of email subscriptions. We may also use the information to contact Users and prospects to further discuss their interest in our company, the Services we provide, ways we can improve our Services, and send information such as announcements of promotions and events regarding **SunContract** or our partners.
- 3.3. We may require Users who contact us through our communication channels and seek customer support services, such as, for example, making questions, comments or other inquiries or communications to us or requiring support or feedback from us (“**Support Services**”) to give us certain contact information. Users are required to provide accurate, lawful and up-to-date information to us and to comply with all applicable laws when sharing personal data with us. The personal data we collect may include:
- First Name;
 - Last Name;
 - Email;
 - Phone number;
 - or any other personal data that you provide to us.
- 3.4. The source of personal data is the User (or someone on the User’s behalf). In case you choose not to share certain personal data with us, we may not be able to provide you with the Support Services.
- 3.5. We will hold the above information for as long as it is necessary in order to deal with any specific issues that you may raise or otherwise as is required by the applicable laws or regulations.

4. Disclosure of personal information

- 4.1. We do not distribute or share any User’s personal information, except as outlined in this Privacy Policy, or as may be required by law and when we believe that disclosure is necessary to protect our rights and/ or to comply with a judicial proceeding, court order, or legal process.
- 4.2. We may disclose your personal information to third parties in the following events and with the following persons:
- with Google Analytics (for the purpose of analysing the visits to our Site);
 - if **SunContract** or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers and Users will be one of the transferred assets;
 - if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
 - with specialized third-party service providers, we utilize for operating the newsletter (such as Mailchimp);
 - to keep you up to date on the latest service announcements, updates, special offers or other information that we think you’d like to hear, either from us, our business partners or third parties;
 - in order to enforce or apply our Terms and Conditions for the use of Website and any other relevant agreements;
 - to protect the rights, property, or safety of **SunContract**, our customers, or others; which includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction; and
 - as otherwise outlined in this Privacy Policy.

4.3. To the best of our efforts, your personal data will not be disclosed to third parties without obtaining your prior consent, unless we are required by law, or if we must disclose the data to enforce our claims to third parties, who are obligated to maintain secrecy, or in events specified in Article 5.2 of this Privacy Policy.

5. Use of cookies and similar technology

5.1. **SunContract** uses cookies on its Website. Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser or/and hard drive and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you. They are also widely used to make websites work, or function more efficiently, as well as to provide information to the owners of the websites.

5.2. By accessing the Website and using any Services through it, you consent to the use of cookies. Where required under applicable laws, your consent to non-essential cookies will be requested and these cookies will not be placed without your consent. You can revoke your consent at any time.

5.3. Cookies can be "persistent" or "session" cookies. Most of the cookies are only used for one session and afterwards they are deleted from your web browser or/and hard drive at the end of the browser session ("session cookies"). Other permanently stored cookies remain on your computer and allow us to recognize you when you visit the Website again ("persistent cookies").

5.4. We use cookies for the following purposes:

- session cookies are mandatory for proper operating and functioning of applications on the website;
- persistent cookies enable the transformation of information of each website visitor to web server;
- to provide analytics, to store your preferences and to enable advertisements delivery, including behavioural advertising;
- to evaluate the effectiveness of our Website and analyze trends, and administer the Website.

The information collected from cookies allows us to determine which parts of our Website are most visited and difficulties our visitors may experience in accessing our Website. With this knowledge we can improve the quality of your experience on the Website by recognizing and delivering the most desired features and information, as well as by resolving access difficulties.

5.5. We also use cookies and/or a technology known as web bugs or clear gifs, which are typically stored in emails to help us confirm your receipt of, and response to, our emails and to provide you with a more personalized experience when using our Website.

5.6. We also employ adserver unique links to connect our emails, your responses and our offers and advertisements to each other.

5.7. In addition to our own cookies, we may also use various third-party cookies, including Google Analytics, Facebook, LinkedIn as well Google Ads to report usage statistics of the Website, deliver advertisements and so on.

5.8. We treat information collected by cookies as non-personal information. However, to the extent that IP addresses or similar identifiers are considered personal data by applicable data protection laws, we

also treat these identifiers as personal data. If we combine non-personal information with personal data, the combined information will be treated as personal data for as long as it remains combined.

- 5.9. You can control the setting of cookies on your device using your browser's settings. In the event the terms and conditions governing cookies are amended, all previous cookies managed by us will be deleted and set again according to the newly published terms and conditions. We cannot delete cookies set on our Website that are managed by third parties (for instance Google Analytics, Facebook, etc.). If you want to avoid using cookies altogether, you can disable or delete cookies in your browser's settings. You can also block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site. Your use of our Website or service with a browser that is configured to accept cookies constitutes an acceptance of our and third-party cookies.
- 5.10. If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all the features and Services we offer, you may not be able to store your preferences, and some of our pages might not display properly.

6. Social Media Widgets

- 6.1. Our Website may include Social Media Features, such as the Facebook button and Widgets, such as the Share this button or interactive mini programs that run on our Site. These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policy of the company providing it. In such federated identity login, the data required for registration (e.g., the e-mail deposited with Facebook/ Google/ LinkedIn, some additional information that is available in your Facebook/ Google/ LinkedIn public profile) will be transferred from your Facebook/ Google/ LinkedIn profile to **SunContract** may also be transferred back from our website to Facebook/ Google/ LinkedIn. The data transferred by Facebook/ Google/ LinkedIn can be stored and processed by **SunContract**.
- 6.2. When you visit one of our web pages with a corresponding plug-in, the browser builds a direct connection with the Facebook servers, which happens even if you are not a Facebook user. The contents of the plug-in are delivered from Facebook right on your browser and embedded in the web page. **SunContract** has no influence on the range of data that Facebook collects. In any case, Facebook may collect the information that you have visited a respective web page via **SunContract**. For Users registered and logged into Facebook, Facebook can associate the visit of the website to your Facebook account. When you interact with the plug-ins by clicking the "Like" button or by leaving a comment, or by sharing, for example, the relevant information is delivered directly from your browser to Facebook and stored there. If you want to prevent such data from being transferred, you must logout of your Facebook account before visiting **SunContract** website. For further information on the function and scope of the data collected by Facebook, as well as the use of your data, please see Facebook's Privacy Policy.

7. Third Party Websites

- 7.1. The Website may, from time to time, contain links to other third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies (including, as the case may be, landing pages of other **SunContract** products or services; i.e. other than

SunContract Platform, accessible at: platform.suncontract.org) and that we do not accept any responsibility or liability in respect of these policies. Please check these policies before you submit any personal data to these websites.

8. Your rights

- 8.1. You can easily opt out of receiving newsletter communications by clicking the hyperlink at the bottom of each email message, or at any time by contacting us at privacypolicy@suncontract.org.
- 8.2. You are entitled to review, correct, or amend your personal data, or to delete that data where it is inaccurate. You are also entitled to receive a copy (that might be subject to a small processing fee) of the personal data undergoing processing. Upon request, we will provide you with information about whether we hold or process any of your personal information and how your data is processed, whether on behalf of a third party or otherwise. To request this information, please contact us at privacypolicy@suncontract.org.
- 8.3. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We use a third-party platform host, who hosts the forms on our Site, they do not have any access to the personal information that you submit on our Website.
- 8.4. We have established internal policies for the deletion of data from Users following the termination of a User's subscription to the newsletter. Personal data whose retention period has expired or whose purpose of processing has been served, are deleted, destroyed, blocked or anonymized.
- 8.5. You may ask us not to process your personal data for a particular purpose, or to access such information, by contacting us at privacypolicy@suncontract.org. Please note, however, that you shall remain liable for any fees or costs incurred at the time of the withdrawal of your consent to process your personal data.

9. Safeguarding your personal data

- 9.1. **SunContract** employs organizational methods and processes as well as technical measures and processes, to protect your data from loss, theft, misuse, unauthorized access or dissemination, alteration and/or destruction. We strive to employ strict security and cyber-security measures to protect your personal data.
- 9.2. The data that we collect will be stored on the cloud based in the **European Economic Area ("EEA")**. Where we need to transfer your personal data outside the EEA to a country not otherwise deemed to have adequate data protection laws, we will comply with transfer restrictions such as executing appropriate transfer agreements and implementing required safeguards to protect your personal data.
- 9.3. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. The communication internally between our servers (e.g. between application server and database) is handled via secure socket layer ("SSL") to provide AE-256 encryption and all information between our servers and your browser is handled via SSL (up to 256-bit encryption, depending upon your browser), providing an industry-standard level of protection for data in-transit. You should always make sure that your browser can validate the Website's certificate. All encrypted data is signed using a message authentication code (MAC) so that the underlying value cannot be modified once encrypted.

9.4. Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee and we do not warrant the security of your data transmitted to the Website, although we will do our best to protect your personal data. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

10. Limitation of liability

10.1. In the case of abuse or breach of security, we are not responsible for any breach of security or for any actions of any third parties which receive the information illegally.

10.2. If you choose to restrict the collection or use of your confidential and personal information, please exit our Website.

11. Changes to this Privacy Policy

11.1. From time to time we may update this Privacy Policy at our sole discretion.

11.2. Unless otherwise notified by us, the changes to this Policy are effective when they are published on the Website. You can determine when this Policy was last revised by referring to the “LAST UPDATED” legend at the bottom of this Policy. Your continued access or use of the Platform after such changes conclusively demonstrates your full acceptance of those changes.

12. Contact Information

12.1. If you have questions, concerns or suggestions related to our Privacy Policy or our privacy practices you may contact us at: privacypolicy@suncontract.org.

12.2. For any questions regarding your rights or if you believe that someone has provided us with your personal information and you would like to request that it be removed from our database, you can contact our data protection officer via this email: privacypolicy@suncontract.org

Date of Last Revision: **March 3rd, 2024**