

## PRIVACY POLICY

### 1. Introduction

The protection and security of your personal data are important to **AMPYR Global Energy Holdings Pte. Ltd.**, (Registration Number 201906134K), and/or its parent company, subsidiaries and affiliates, which are referred to in this Policy as “**AMPYR Group**”, “**we**” or “**us**” or “**our**” collectively or singularly as the context requires. We are committed to managing personal information under the Data Protection Act 2018 in United Kingdom. Most processing of personal data is subjected to the GDPR. Our Privacy Policy outlines how we collect and handle your personal data when you visit this website (“<https://www.ampyrenergy.com>”) (“**Website**”) and tell you about your privacy rights in connection with our products or services provided in United Kingdom through AMPYR Group.

Our Website has been developed and is operated by AMPYR Group of 104 Amoy Street, #02-01, Singapore 069924 who is the controller of your personal data processed in connection with our Website.

**Please read this Privacy Policy as doing so will allow you to make an informed decision before providing us with any of your personal data via our Website.**

### 2. Types of Information Collected

Personal data, or personal information, means any information or opinion about an identified individual or from which an individual can be reasonably identified. It does not include data where the identity has been removed (anonymous data).

We collect and hold personal data that is necessary for, or related to, one or more of our services or activities; or because it is required under a relevant law or regulation.

The types of personal data that we will collect from you will depend on the nature of your interaction with us. We may collect, use, store and transfer different kinds of personal data about you including as follows:

- **Contact Data** includes full name, residential address, personal email address and personal telephone number.
- **Transaction Data** includes details about products or services your request from us.
- **Technical Data** includes information about how you use our website, internet protocol (IP) address, 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.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us.

From time to time, you may be able to deal with us anonymously or by pseudonym. However, where we need to collect personal data, for example, 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.

### **3. Collection**

We collect personal information to provide our products and services and for our business operations. We describe the main types of personal information we collect and the main reasons why we collect that information below.

Information collected may include your name, postal or residential address, email address, telephone number, date of birth, nationality, tax identification number, bank account and investment details.

We may collect information that you give to us when you or your authorised representatives interact with us, for example, if you contact us regarding an investment. We may also collect information from outside sources such as our business and commercial partners, credit reporting bodies, consultants, other customers and from publicly available sources (such as published content) and data providers, as well as information from AMPYR Group members in United Kingdom or internationally.

We also collect personal information about individuals employed by our suppliers, contractors, dealers, agents and corporate customers. We will explain why we are collecting this information and how we will use that information, unless it is obvious from the circumstances.

When you apply for a job or contract with us, we may collect information about you to help us decide whether to offer you the job or contract. For example, we may collect information about how to contact you, your education or work history, or other information included in your CV or résumé. We may collect this information from you, or from any recruitment consultant, your previous employers, or other referees.

### **4. Purposes for processing your personal information**

We may process any personal data you provide to us to enable us to perform the contract entered into between you and us, to ensure our compliance with legal and regulatory requirements or for the purposes of our legitimate business interests, including the following:

- to enable us to carry out our obligations arising from any contracts and to provide you with the information, products and services that you request from us;
- to enable us to verify your identity;
- to enable us to verify, facilitate, respond to and/or process an enquiry or other request you make when you contact us via our Website, including for customer services support;
- to manage your relationship with us;
- to comply with our legal obligations, standards, policies and procedures under applicable law;
- for purposes related to the administration of products and services offered by us;
- to notify you about changes to our products and services;

- for researching, designing and launching financial, investment services or related products for clients;
- to enable us to issue a notice or corrective action to you in relation to any of our services, if required;
- to better understand how you interact with our Website, including its functionality and features, and ensure that content is presented in the most effective manner;
- to store, host and/or backup (whether for disaster recovery or otherwise) your personal data, whether within or outside United Kingdom;
- for record-keeping purpose;
- to respond to requests for information from public and governmental/regulatory authorities, statutory board, related companies and for audit, compliance, investigation and inspection purposes;
- to communicate and provide you with the relevant market information you have requested in our newsletters (by email);
- for research and data analysis to improve our products and services. We may do this research or engage a service provider to do this on our behalf; and
- for any other purpose related to the above.

Your personal data will be retained for as long as it is necessary to fulfil the purposes for which it was collected or for business or legal purposes, or in accordance with applicable laws.

When we collect your information, we may explain that we will use and disclose your information in other ways.

We may also remove certain information or alter the information we collect about you so you can no longer be identified from that information. We do this so that we can use it or disclose it to third parties for other purposes.

## **5. Marketing**

We may also use your personal data to send you marketing-related information (such as newsletters) from AMPYR Group where it is linked to the products or services we are providing you. You may unsubscribe at any time by clicking on the “unsubscribe” link at the bottom of each marketing communication.

Please note that where you opt-out of receiving marketing communications, we may still send you certain communications relating to your use of our products or services, such as service announcements, notices about information on the products or services and administrative messages.

## 6. Disclosure of Your Personal Data

Your personal data may be used, disclosed, maintained, accessed, processed and/or transferred to the following third parties, whether located in United Kingdom or outside of United Kingdom, for one or more of the purposes set out above:

- our parent company, subsidiaries and affiliated companies;
- public and government/regulatory authorities, statutory boards, industry associations and/or agencies under applicable laws;
- courts and other alternative dispute forums;
- 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;
- banks where we facilitate opening your account for managing your portfolio(s);
- third party service providers which require the processing of your data, for example, third party service providers which have been engaged by us to: (i) to provide and maintain any IT equipment and cloud computing system used to store and access your personal information; or (ii) to host and maintain our Website;
- third party service providers who provide administrative, research, design, launch, digital or telecommunication, settlement clearing or other services to us (such as due diligence services, identification verification services, trustees, custodians, investment managers in the operation of our business); or
- Where we provide your personal data to third party services providers, they are required to keep your personal data confidential and secure, and must only use your personal data as instructed by.

We may also disclose your personal data where required to respond to authorized requests from public and government/regulatory authorities, statutory boards or where required by any applicable law, including for national security. Where required by law, we may also disclose your personal data where necessary to enforce or apply our Website Terms or other agreements, to investigate or protect the rights, property or safety of AMPYR Group, Hartree Partners, our group companies, our products and services and our personnel, customers, distributors or business partners or to prevent or take action regarding illegal activities or fraud, situations involving potential threats to the safety of any person or as evidence in litigation or investigations.

## 7. Keeping Your Personal Information Secure

We will take all reasonable steps (including appropriate technical and organisational measures) to ensure your personal data is processed securely to protect the confidentiality, integrity and availability of your personal data and in accordance with this Privacy Policy.

The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet and any transmission is at your own risk.

## 8. Storing your Personal Information

Your personal data collected via our Website will be stored on servers located in India. It may also be processed by, and transferred to, AMPYR Group staff, Hartree Partners staff or by one of our service providers operating outside of United Kingdom (including Singapore, Australia, India, or other countries). By submitting your personal data to us, you agree and consent of such transfer, storing and processing.

We have implemented appropriate safeguards, to protect your personal data when it is transferred. Please contact our Hartree Data Protection Group by email at [GDPR@hartreepartners.com](mailto:GDPR@hartreepartners.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the United Kingdom or European Economic Area or by mail to our subsidiary: AMPYR Energy UK Development Limited, 100 Victoria Street, 2<sup>nd</sup> Floor Cardinal Place, West Building, London, United Kingdom, SW1E 5JL for the attention of Hartree Legal (Data Protection Group).

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 data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 9. Updating Your Personal Information

Where you submit your personal data to us, you should ensure such personal data is accurate, and let us know if such personal data changes so that we are holding any inaccurate personal data about you.

## 10. Your Rights

You may inform us of any changes to your personal data, and in accordance with our obligations under applicable data protection laws we will update or delete your personal data accordingly. To find out what personal data we hold on you or to have your personal data updated, amended or removed from our database, please contact us using our contact information below.

Residents of the United Kingdom and European Economic Area (“EEA”): You may have the right to: request (a) access the to your personal data we hold about you; (b) request we correct any inaccurate personal data we hold about you; (c) request we delete any personal data we hold about you; (d) restrict the processing of personal data we hold about you; (e) object to the processing of personal data we hold about you; and/or (f) receive any personal data we hold about you in a structured and commonly used machine-readable format or have such personal information transmitted to another company. You also have the right to lodge a complaint about how we process your personal data with the supervisory authority for data protection issues in your country.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing information requested to you.

To exercise any of your rights in connection with your personal data, please contact our Hartree Data Protection Group by email at [GDPR@hartreepartners.com](mailto:GDPR@hartreepartners.com) or by mail to AMPYR Energy UK



Development Limited, 100 Victoria Street, 2<sup>nd</sup> Floor Cardinal Place, West Building, London, United Kingdom, SW1E 5JL for the attention of Hartree Legal (Data Protection Group). We will process any request in line with any local laws and our policies and procedures.

#### **11. Third-Party Links**

This Website may, from time to time, contain links to and from our business partners, affiliates or other 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 nor liable for the contents of their websites and their privacy policies. When you leave our Website, we encourage you to read the privacy policy of every website you visit before submit any personal data to any such websites.

#### **12. Changes to this Privacy Policy**

We reserve the right to amend the terms of this Privacy Policy from time to time and publish on the website. Your continued use of our website and/or the services made available on our Website following any amendment of this Privacy Policy will signify your assent to and acceptance of its revised terms.

#### **13. Our Data Protection Officer(s)**

If you have any questions about the processing of personal data via this Website, please contact our Hartree Data Protection Group by email at [GDPR@hartreepartners.com](mailto:GDPR@hartreepartners.com) or by mail to AMPYR Energy UK Development Limited, 100 Victoria Street, 2<sup>nd</sup> Floor Cardinal Place, West Building, London, United Kingdom, SW1E 5JL for the attention of Hartree Legal (Data Protection Group). If you contact us, we will do our utmost best to address any concerns you may have about our processing of your personal data.