
Carbon Asset Solutions Privacy Policy

Date: 13 May 2024

1 Introduction

Carbon Asset Solutions Ltd (ACN 624 242 842) with its principal offices at Level 19, 10 Eagle Street, BRISBANE QLD 4000 AUSTRALIA (**CAS, we, us and our**) understand that your privacy is paramount and are committed to protecting your privacy. This CAS Privacy Policy sets out how we handle personal information about you.

This Privacy Policy applies to the <https://carbonassetsolutions.com/> website, CAS Registry, the Carbon Asset Solutions Soil Carbon Methodology Portal (**CAS Portal**) and databases, and any other web properties which are owned or operated by CAS (collectively, the **Sites**), as well as our processing practices in relation to the collection of personal information through other means.

We may modify or amend this Privacy Policy from time to time. We will display a notice on our Sites indicating when material revisions have been made. This Privacy Policy was last updated on 13 May 2024.

Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Privacy Policy.

2 Collection of personal information

CAS may collect and store personal information disclosed by you, such as your email-address, name, home or work address or telephone number, when you:

- visit our Sites;
- subscribe to any updates or newsletters on our Sites;
- submit an Expression of Interest Form on our Sites;
- open a Registry Account on the CAS Registry. We will also require the position title of the authorised representative/s, account manager and billing contact identified by the Account Holder for the account. If the Account Holder or other party is an individual, additional details about that person may be collected such as bank account and physical address and, if required, details to conduct verification checks such as date of birth or official identity documentation;
- operate a Registry Account on the CAS Registry. We may also record details about activities on the CAS Registry such as transaction details which could identify a person;
- open and operate an account as a Project Owner, Third Party Auditor or Contractor on the CAS Portal. Where an account is opened for a Project Owner on the CAS Portal, additional information and data about the specific project will also be obtained;
- provide your contact details for communications with stakeholders, strategic partners and other parties relevant to CAS' activities. We may also require the position title of the representatives of parties that will communicate with CAS;
- provide personal information in reports, surveys, questionnaires and forms provided to CAS in order to participate in the CAS Registry;
- communicate with us by any method, such as via our Sites, telephone, email, post or in person;

or otherwise as notified to you from time to time.

If CAS is not provided with all requested personal information, CAS may be unable to register an Account Holder, provide the requested CAS service and resources or respond fully to a request.

This Privacy Policy only applies to information that is collected through our Sites. It does not apply to any information that may be collected by other website users, such as through email communications or transactions between you and another user. If you disclose your information to other Site users, different rules may apply to their use or disclosure of your personal information. CAS does not govern the privacy or security of the personal information you provide to others.

Sometimes our Sites contain links to other websites. When you access a website other than our Sites, we are not responsible for the privacy practices of that website. We recommend that you review the privacy policies of each website that has links within the CAS Sites and which you choose to navigate to from our Sites so that you understand how those websites collect, use and share your information.

3 Our Sites

Our Sites may automatically collect and store information when you visit our Sites, including:

- your IP address;
- the date and time of your visit;
- the parts of our Sites you access during your visit;
- your actions and any activities on our Sites; and
- the browser you are using.

In using our Sites, your personal information may be collected through the use of cookies. These are small text files placed on your mobile device or computer by our Sites which automatically collect information about you without you providing that information to us directly. Most browsers are set by default to accept cookies. CAS uses cookies to make your use of our Sites, resources and services more convenient.

If you do not wish to receive any cookies, you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies. Please note that rejecting cookies may mean that some of the functions and services on our Sites will not be available to you.

4 Using your personal information

The personal information that we collect is used to offer our products and services to you in an efficient and personalised way.

To this end, you agree and accept that your personal information collected by CAS may be used for the following purposes:

- operating the CAS Registry and CAS Portal, providing the CAS Program services and resources and related initiatives and activities;
- administering, maintaining and improving our Sites;
- informing you of other products or services available from CAS;

- improving CAS' products, services and resources;
- complying with legal and regulatory obligations;
- responding to your questions or suggestions and stakeholder queries or requests for information; and
- contacting you to conduct research about your opinion of current services or of potential new services that may be offered.

You may opt out of receiving marketing information and / or our newsletter updates by notifying us accordingly, or by using any unsubscribe facility we provide for that purpose.

5 Sharing your personal information

We may disclose your personal information to service providers under contract with CAS, who help us conduct our business operations. Where information is disclosed to our service providers, we will take all reasonable steps to ensure that the service provider observes the confidential nature of such information.

We may disclose your personal information to a service provider as referred to above that is located outside Australia, including but not limited to the United States of America, Canada, United Kingdom, the European Union and Singapore. As CAS' operations expand, service providers may also be located in other parts of Europe, Asia, South America and the Middle East. Due to circumstances which change from time to time it is not practicable for us to specify all the countries in which such third parties are located, however, CAS will take all reasonable steps to update this Policy to incorporate key jurisdictions.

We will not sell, rent or trade your personal information to any third parties.

If, through the use of our Sites, you receive personal information about another Site user, you agree to (a) keep such information confidential and protect the personal information of such user in a manner at least as restrictive as the manner in which CAS protects such information as set out herein; (b) use the information only for Site transaction-related purposes; or (c) use the information for other purposes expressly authorised by the information owner.

CAS may disclose your personal information as permitted or required by law or in the good faith belief that such action is necessary to: (a) conform to legal requirements or comply with a legal process served on CAS or our Sites; (b) protect and defend the rights or property of CAS; (c) enforce our policies; (d) respond to claims that a listing or other content violates the rights of others; (e) protect the personal safety of users of CAS or the public; or (f) to report suspected illegal activity. All such information will be disclosed in accordance with applicable laws and regulations.

6 Accessing and correcting your personal information

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact our Privacy Contact as described in section 10 below and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

We will, on request, provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under relevant privacy legislation. If you require access to your personal information,

please contact our Privacy Contact as described in section 10 below. You may be required to put your request in writing for security reasons.

For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part. If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the Australia Privacy Principles (unless it would be unreasonable to do so).

7 Protecting your personal information

We are committed to protecting your personal information. We take appropriate security measures to protect your personal information from misuse, interference or loss, and from unauthorised access, modification or disclosure. This includes the use of technologies and processes such as multi-factor authentication, access control procedures, network firewalls, data encryption, secure communication, and physical security to protect the privacy of your personal information.

Individuals who have been granted access to personal information are aware of their responsibilities to protect the security, confidentiality and integrity of that information. As effective as modern security practices are, we cannot always guarantee the security of our database, nor can we guarantee that the information you supply will always remain private. CAS retains your personal information to comply with the law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, enforce our Terms of Use, and take other actions as permitted by law.

8 GDPR compliance

CAS adheres to the European Union General Data Protection Regulation (**GDPR**). CAS may process your personal information as both a Processor and a Controller, in accordance with the GDPR. This means:

- you have the right to request access to information we hold about you. You can do this by contacting our Privacy Contact as described in section 10 below. In order to comply with your request, we may ask you to verify your identity.
- if you believe the information we have on you is incorrect or requires updating, you can contact our Privacy Contact so we can update it; and
- if at any time you would like us to delete your information, please contact our Privacy Contact.

9 Change of policy

We may modify or amend this Privacy Policy from time to time. We will display a notice on our Sites for a reasonable period after any material revisions have been made. We will keep the current version of this Privacy Policy on our Sites. Each time you use our Sites, the current version of the Privacy Policy will govern your use.

10 Contact us

If you have any queries or complaints with regards to our collection, use or management of your personal information, please contact us at enquiry@carbonassetsolutions.com or on our Site here.

If you make a complaint, we will endeavour to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by emailing enquiries@oaic.gov.au.