

PRIVACY POLICY

A. Who we are and how to contact us

Our offering, which comprises our website available at <http://www.exponentialscience.org> and/or a mobile app and any supporting servers, software, or third-party integrations used to deliver our services is operated by Exponential Science Foundation (“we”, “our” or “us”).

To contact us, please email: dataprotection@esf.org.

B. Privacy policy

1. This privacy policy gives you information about how we collect and use your personal data through your use of this website, including any data you may provide when you register with us or sign up to our newsletter.
2. This website is not intended for children and we do not knowingly collect data relating to children.

C. Controller

1. We are the controller of your personal data and responsible for your personal data.
2. We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us our DPO at dataprotection@esf.org.

D. The types of personal data we collect about you

1. Personal data means any information about an individual from which that person can be identified.
2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - (i) **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
 - (ii) **Contact Data** includes billing address, delivery address, email address and telephone numbers.
 - (iii) **Financial Data** includes bank account and payment card details.
 - (iv) **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
 - (v) **Technical Data** includes 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, device ID and other technology on the devices you use to access this website.

- (vi) **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
 - (vii) **Usage Data** includes information about how you interact with and use our website, products and services.
 - (viii) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
3. We also collect, use, and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

E. How is your personal data collected?

1. We use different methods to collect data from and about you including through:
- 1.1. **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - 1.1.1. create an account on our website;
 - 1.1.2. subscribe to our service or publications;
 - 1.1.3. make a payment to us;
 - 1.1.4. request marketing to be sent to you; or
 - 1.1.5. give us feedback or contact us.
 - 1.2. **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [Cookie Policy](#) for further details.
 - 1.3. Technical Data is collected from the following parties:
 - 1.3.1. analytics providers;
 - 1.3.2. advertising networks; and
 - 1.3.3. search information providers.
 - 1.4. Contact, Financial and Transaction Data is also collected from providers of technical, payment and delivery services.
 - 1.5. Identity and Contact Data is collected from data brokers or aggregators.
 - 1.6. Identity and Contact Data is collected from publicly available sources.

F. How we use your personal data

1. **Legal basis:** The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:
 - 1.1. **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
 - 1.2. **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
 - 1.3. **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
 - 1.4. **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

G. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register you as a new customer and to create an account in your name	(a) Identity (b) Contact	Performance of a contract with you
(a) To manage payments, fees and charges (b) To collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)

Purpose/Use	Type of data	Legal basis
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) or consent, having obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

H. Refusal to provide necessary personal data

If you fail, neglect and/ or refuse to, or are unable to provide us any Personal Data which we necessarily need to provide our Services or which we need to collect by law, we may not be able to perform the Services. In this case, we have the right to discontinue your use of the Platform and/ or may or disapprove your service requests. In such a situation, we will notify you of our inability to provide you our Services at the earliest.

I. Direct marketing

1. You will receive marketing communications from us if you have registered with us and you have not asked to be excluded from receiving marketing communications.
2. We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view as to which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

J. Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

K. Opting out of marketing

1. You can ask to stop sending you marketing communications at any time by contacting us.
2. If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

L. Cookies

For more information about the cookies we use and how to change your cookie preferences, please see [Cookie Policy](#).

M. Disclosures of your personal data

1. We may share your personal data where necessary for the purposes set out in the table. **Purposes for which we will use your personal data** are stated above.
2. We require all third parties to respect the security of your personal data and to treat it in accordance with the relevant law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
3. Here is a list of the specific circumstances in which we share your Personal Data with third parties and specific categories of third parties with whom such data is shared:
 - **To provide Services to You:** To enable this we may share your Personal Data with select third-party vendors.
 - **Applicable law, government requests, etc.:** Where we are legally required to do so, we may disclose your Personal Data to comply with applicable law, governmental requests, a

judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements), or where we find it is necessary to investigate, prevent or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities. We may disclose your Personal Data as evidence in any litigation in which we are involved. To enable this we may share your Personal Data with the relevant law enforcement, regulatory, administrative, judicial, or government bodies, authorities or agencies.

- **Merger, acquisition etc.:** We may disclose your Personal Data in connection with, or during negotiations of, any merger, sale of company assets, financing, acquisition of all or a portion of our business to another company, any dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, your Personal Data may also be transferred as a business asset forming part of our good will. If another company acquires us, our business or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations held by us regarding your Personal Data, as described in this Policy. To enable this we may share your Personal Data with the relevant corporate entities involved in the merger, acquisition etc. and their select vendors and service providers.
- **Advertisements:** We may disclose your Personal Data to third-party advertising companies to serve ads when you visit or use the Platform. These companies may use information about your visits to our Platform and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you, provided you have consented to the same.
- **With select third-party vendors:** In connection with the performance of our Services, we may share your Personal Data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples of such third parties include customer relationship management, data analysis, email delivery, hosting services, customer service, quality assurance testing, technical support, operational support and maintenance services and marketing efforts. This is not an exhaustive or stationary list and may be revised from time to time.

Some of these third parties may be in a jurisdiction outside the laws stated in this Policy, in which case we will take all necessary steps to ensure that your Personal Data is treated securely and that such transfers are permitted under the applicable data protection laws.

We may also use any or all of the Personal Data above to administer and manage our business in general, to detect and prevent misuse of our Services (including fraud), and to enforce our Terms of Service or any other contract to which we may be a party to.

N. International transfers

1. We may share your personal data within our group. Whenever we transfer your personal data we always ensure that a suitable degree of protection is afforded to it by ensuring that your personal data is protected by requiring all our group companies to follow the same set of rules when processing your personal data.
2. We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data to countries which have laws that do not provide the same level of data protection as the ADGM.

3. Whenever we transfer your personal data to service providers, we ensure a similar degree of protection is afforded to it.
4. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
5. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
6. Your Personal Data is stored and transferred in compliance with the applicable legislation of the ADGM.
7. We store and process your Personal Data in data centers within Singapore and the United Kingdom, or wherever we have our premises, or where our third-party service providers are located. We may transfer some of your Personal Data outside of Singapore and the United Kingdom. Some of the international organisations and countries to which your Personal Data will benefit from an appropriate data protection regulatory framework as evidenced by an adequacy decision by the appropriate regulatory authority. However, this may not always be possible. For such international organisations and countries, we shall transfer your Personal Data, only upon ensuring that a suitable degree of protection is afforded to it through the implementation of the necessary safeguards, such as **adequate binding corporate rules or through the inclusion of standard contractual clauses in our agreements with such organisations and countries**. If sought by you, we shall notify you of the specific safeguards we adopt to transfer your Personal Data to such an international organisation and/or country.

8. We may transfer your Personal Data outside of Singapore and the United Kingdom in the following circumstances:
- the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and another natural or legal person;
 - the transfer is necessary for important reasons of public interest;
 - the transfer is required by law enforcement agencies in accordance with applicable law;
 - the transfer is necessary for the establishment, exercise or defence of legal claims (including judicial, administrative, regulatory and out-of-court procedures); or
 - the transfer is necessary in order to protect your vital interests or of another person, where you are physically or legally incapable of giving consent.

O. Data retention

1. How long will you use my personal data for?

- 1.1. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 1.2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 1.3. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for compliance with applicable anti-money laundering and know your customer laws.
- 1.4. In some circumstances you can ask us to delete your data: see below for further information.
- 1.5. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

P. Your legal rights

1. You have a number of rights under data protection laws in relation to your personal data.
2. You have the right to:

- (i) Request access to your personal data (commonly known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (ii) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (iii) Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (iv) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- (v) You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see ‘Opting Out of Marketing’).
- (vi) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (vii) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - (a) If you want us to establish the data's accuracy;
 - (b) Where our use of the data is unlawful but you do not want us to erase it;
 - (c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (d) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

3. Where we rely on your consent to process your Personal Data, if you wish for us to stop processing your Personal Data, it is your right to withdraw consent, preventing us from further processing the Personal Data, without prejudicing any processing of your Personal Data which we may have had undertaken till we effectuate your consent withdrawal request. If you wish to withdraw such consent, please contact us at dataprotection@esf.org.

4. If you wish to exercise any of the rights set out above or any other laws concerning Personal Data (in so far as the same is applicable), please contact us at dataprotection@esf.org. We may need to request specific information from you to help us confirm your identity. This security measure is to ensure that your Personal Data is not

disclosed to any person who has no right to receive it. We aim to respond to all legitimate requests without undue delay and within one (1) calendar month of receipt of any request from you. Occasionally it may take us longer than one (1) calendar month, if your request is particularly complex, or if you have made duplicated or numerous requests. In this case, we will notify you of receipt of such request(s) and keep you updated as to the status of progress concerning such request(s).

Q. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

R. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

S. Time limit to respond

We try to respond to all legitimate requests within one (1) month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

T. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us at dataprotection@esf.org.

U. Complaints

You have the right to make a complaint at any time. We would, however, appreciate the chance to deal with your concerns before a complaint is made, so please contact us in the first instance.

V. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

W. Third-party links

This 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 policy of every website you visit.

X. Governing Law

These terms of service, their subject matter and their formation, are governed by Cayman Island Law. We both agree that the Federal Data Protection and Information Commissioner and/or courts of Cayman Islands will have exclusive jurisdiction.