

Privacy and Personal Data Protection

BioCarbon Cert

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1 Introduction

BioCarbon Cert S.A.S. (BioCarbon) is committed to protecting the privacy of individuals and ensuring the lawful, fair, and transparent processing of personal data in the course of its activities.

BioCarbon operates international certification and registry programs related to climate change mitigation, biodiversity conservation, and water stewardship, including the BioCarbon Standard, the Biodiversity BioCarbon Standard (BBS), and the BioCarbon Water Standard (BWS). These programs involve the participation of multiple stakeholders, including project participants, certification bodies, auditors, registry users, contractors, consultants, partners, and other actors engaged in environmental markets.

In the course of administering these programs and maintaining its organizational operations, BioCarbon may collect, store, use, and otherwise process personal data as necessary to administer certification and registry processes, manage relationships with stakeholders and program participants, ensure the integrity and transparency of environmental crediting systems, comply with applicable legal and regulatory obligations, and support the operational activities of the organization.

BioCarbon recognizes that the protection of personal data is a fundamental right and is committed to safeguarding personal data through appropriate technical, organizational, and legal measures. BioCarbon also promotes a culture of privacy and responsible data management across its programs, systems, and operations.

Responsible management of personal data is essential to maintaining the credibility, transparency, and integrity of BioCarbon’s certification programs and registry systems.

This Privacy and Personal Data Protection Policy establishes the principles, rules, and governance framework that guide the processing and protection of personal data by BioCarbon.

The Policy reflects BioCarbon’s commitment to compliance with applicable data protection legislation and internationally recognized best practices for the protection of personal data and privacy.

2 Purpose

The purpose of this Policy is to establish the principles, rules, and governance framework governing the collection, storage, use, transfer, and protection of personal data processed by BioCarbon.

This Policy aims to:

- (a) ensure the protection of personal data processed by BioCarbon in the course of its activities;
- (b) guarantee respect for the privacy and rights of individuals whose personal data may be processed by the organization;
- (c) ensure compliance with applicable data protection legislation and internationally recognized best practices;
- (d) establish clear internal rules for the lawful and responsible processing of personal data;
- (e) promote transparency and accountability in the handling of personal information within BioCarbon's operations.
- (f) Through this Policy, BioCarbon seeks to maintain the trust of stakeholders, program participants, and users of its systems by ensuring that personal data are processed in a responsible, secure, and lawful manner.

3 Scope

This Policy applies to all personal data processed by BioCarbon in connection with its institutional activities and the administration of its environmental programs and systems.

The Policy applies to the processing of personal data in the context of:

- (a) the administration and operation of the BioCarbon Standard;
- (b) the administration of the Biodiversity BioCarbon Standard (BBS) and the BioCarbon Water Standard (BWS);

- (c) certification, validation, and verification activities conducted under BioCarbon programs;
- (d) the operation of registry systems used for the registration of projects and the issuance and management of environmental credits;
- (e) contractual, commercial, and institutional relationships maintained by BioCarbon;
- (f) stakeholder engagement, communication, and participation processes;
- (g) internal administrative, operational, and governance activities of BioCarbon.

This Policy applies to all persons and entities that process personal data on behalf of BioCarbon, including:

- (a) employees, collaborators, and interns;
- (b) contractors and consultants;
- (c) certification bodies and auditors acting under BioCarbon programs;
- (d) service providers and technology partners;
- (e) registry system administrators and operators;
- (f) any other third party authorized to process personal data in connection with BioCarbon's activities.

4 Principles of Personal Data Processing

BioCarbon processes personal data in accordance with the following principles, which are derived from applicable data protection legislation and internationally recognized privacy and data protection standards.

These principles guide all activities involving the collection, use, storage, transfer, and protection of personal data within BioCarbon's operations.

Lawfulness, Fairness and Transparency

Personal data shall be processed in a lawful, fair, and transparent manner. BioCarbon ensures that personal data are collected and processed only when a

legitimate legal basis exists and that individuals are informed about how their personal data are used.

BioCarbon shall provide clear and accessible information regarding the purposes and conditions under which personal data are processed.

Purpose Limitation

Personal data shall be collected for specified, explicit, and legitimate purposes and shall not be further processed in a manner incompatible with those purposes.

BioCarbon shall ensure that personal data are used only for the purposes for which they were collected or for purposes that are compatible with those originally specified.

Data Minimisation

BioCarbon shall collect and process only the personal data that are necessary and relevant for the purposes for which they are processed.

The organization shall avoid the collection of excessive or unnecessary personal data and shall ensure that data processing activities remain proportionate to their intended purpose.

Accuracy

BioCarbon shall take reasonable measures to ensure that personal data are accurate, complete, and kept up to date.

Where inaccurate or incomplete personal data are identified, BioCarbon shall take appropriate steps to correct or update such data without undue delay.

Storage Limitation

Personal data shall be retained only for as long as necessary to fulfil the purposes for which they were collected, or as required by applicable legal, regulatory, or contractual obligations.

BioCarbon shall establish appropriate data retention practices to ensure that personal data are not kept longer than necessary.

Integrity and Confidentiality

BioCarbon shall implement appropriate technical and organizational measures to ensure the security and confidentiality of personal data.

These measures shall aim to protect personal data against unauthorized access, accidental loss, destruction, alteration, or unlawful disclosure.

Accountability

BioCarbon is responsible for ensuring and demonstrating compliance with the principles set out in this Policy.

The organization shall maintain appropriate governance mechanisms, internal procedures, and oversight measures to ensure responsible and lawful processing of personal data.

5 Objectives

The objectives of this Privacy and Personal Data Protection Policy are to:

- (a) Ensure that personal data processed by BioCarbon are handled in a manner that respects the privacy and fundamental rights of individuals;
- (b) Establish clear principles and rules for the lawful, fair, and transparent processing of personal data in accordance with applicable legal and regulatory frameworks;
- (c) Strengthen BioCarbon's governance framework by defining responsibilities and standards for the proper management and protection of personal data across the organization;
- (d) Promote transparency in the handling of personal data and reinforce the confidence of stakeholders, program participants, and users of BioCarbon systems;
- (e) Ensure that personal data processed in connection with certification processes, registry systems, and program administration are handled securely and responsibly;
- (f) Promote the adoption of appropriate technical and organizational measures to prevent unauthorized access, misuse, loss, or disclosure of personal data;

(g) Ensure that individuals whose personal data are processed by BioCarbon are able to exercise their rights in a clear and effective manner.

6 Definitions

For the purposes of this Policy, the following terms shall have the meanings set out below.

Certification Body (CAB)

An independent conformity assessment body authorized to perform validation and verification activities under BioCarbon programs.

Data Controller

The natural or legal person that determines the purposes and means of the processing of personal data.

Data Processor

A natural or legal person that processes personal data on behalf of the Data Controller.

Data Subject

A natural person whose personal data are collected or processed.

Personal Data

Any information relating to an identified or identifiable natural person.

Personal Data Breach

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

Processing

Any operation or set of operations performed on personal data, whether by automated means or not, including collection, recording, storage, organization, use, consultation, disclosure, transfer, restriction, or deletion.

Registry System

The digital platform used to register projects, track environmental credits, and manage related transactions under BioCarbon programs.

Sensitive Personal Data

Personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health data, biometric data, sexual orientation, or other categories considered sensitive under applicable law.

Third Party

Any natural or legal person other than the data subject, the data controller, the data processor, or persons authorized to process personal data under the authority of the controller or processor.

7 Legal and Regulatory Framework

BioCarbon processes personal data in accordance with applicable data protection laws and regulations in the jurisdictions in which it operates.

BioCarbon is committed to complying with relevant national legislation governing the protection of personal data and privacy, as well as internationally recognized standards and best practices for data protection.

In particular, BioCarbon seeks to align its data protection practices with widely recognized international frameworks, including the principles reflected in the European Union General Data Protection Regulation (GDPR) and other globally recognized privacy and data protection standards.

Where BioCarbon processes personal data in connection with activities that involve multiple jurisdictions, the organization shall seek to ensure that the processing of personal data meets the applicable legal requirements and maintains a high level of protection for the privacy and rights of individuals.

BioCarbon may also adopt additional internal policies, procedures, and safeguards to ensure compliance with evolving legal and regulatory requirements related to data protection and privacy.

Where differences exist between applicable legal frameworks, BioCarbon shall seek to apply the standard that provides the highest level of protection for personal data.

Privacy and Personal Data Protection Policy

8 Processing of Sensitive Personal Data

BioCarbon recognizes that certain categories of personal data require enhanced protection due to their sensitive nature.

Sensitive personal data include information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health data, biometric data, sexual orientation, or other categories considered sensitive under applicable law.

BioCarbon shall process sensitive personal data only where a lawful and legitimate basis exists and where such processing is strictly necessary for legitimate organizational purposes.

Where sensitive personal data are processed, BioCarbon shall implement heightened safeguards designed to ensure the confidentiality, security, and restricted access to such data.

Access to sensitive personal data shall be limited to authorized personnel who require such access for legitimate operational purposes.

9 Roles and Responsibilities

BioCarbon acts as the Data Controller with respect to personal data processed in connection with its programs, systems, and organizational activities. As Data Controller, BioCarbon determines the purposes and means of the processing of personal data and is responsible for ensuring that such processing is conducted in accordance with this Policy and applicable legal requirements.

BioCarbon may engage third parties to support certain operational activities that involve the processing of personal data. In such cases, these entities shall act as Data Processors and may process personal data only on behalf of BioCarbon and in accordance with the instructions, contractual obligations, and safeguards established by the organization.

BioCarbon may also interact with independent entities such as certification bodies, auditors, consultants, service providers, and registry system administrators, which may process personal data in the course of carrying out activities related to BioCarbon programs. Where applicable, such entities shall be required to implement appropriate safeguards to ensure the protection and lawful processing of personal data.

BioCarbon shall designate an internal responsible person or contact point responsible for overseeing matters related to privacy and personal data protection.

All employees, collaborators, contractors, and third parties who process personal data in connection with BioCarbon's activities shall comply with the provisions of this Policy and shall ensure that personal data are handled in a secure, confidential, and responsible manner.

10 Categories of Personal Data Processed

In the course of its activities, BioCarbon may collect and process personal data necessary for the administration of its programs, systems, and organizational operations.

Depending on the context in which personal data are collected, BioCarbon may process personal data relating to various categories of individuals, including but not limited to:

- (a) users of registry systems and digital platforms operated in connection with BioCarbon programs;
- (b) project developers, project proponents, and project participants;
- (c) representatives of organizations participating in BioCarbon programs;
- (d) personnel of certification bodies and conformity assessment bodies;
- (e) auditors, validators, and verifiers;
- (f) consultants, contractors, and service providers;
- (g) employees, collaborators, and interns;
- (h) stakeholders, partners, and participants in consultations or engagement processes.

The personal data processed by BioCarbon may include, where relevant and appropriate:

- (a) identification information, such as name and identification number;
- (b) contact information, such as email address, telephone number, and mailing address;

- (c) professional and organizational affiliation information;
- (d) information necessary to establish or maintain contractual or professional relationships;
- (e) information required to administer certification, validation, verification, or registry processes;
- (f) communications and correspondence with BioCarbon.

BioCarbon shall limit the collection and processing of personal data to what is necessary and relevant for the purposes for which such data are processed.

11 Purposes of Processing

BioCarbon processes personal data solely for legitimate organizational purposes related to the administration of its programs, systems, and institutional activities.

Personal data may be processed for the following purposes:

- (a) administering certification, validation, and verification processes conducted under BioCarbon programs;
- (b) operating registry systems used for the registration of projects and the issuance, tracking, and management of environmental credits;
- (c) maintaining communication and relationships with project developers, program participants, certification bodies, auditors, consultants, and other stakeholders;
- (d) managing contractual, professional, and institutional relationships involving BioCarbon;
- (e) ensuring the integrity, transparency, and traceability of environmental crediting systems administered by BioCarbon;
- (f) complying with applicable legal, regulatory, and contractual obligations;
- (g) managing internal administrative, operational, and governance activities of the organization;

- (h) responding to inquiries, requests, consultations, or communications from stakeholders or members of the public;
- (i) supporting outreach, engagement, and participation processes related to BioCarbon programs and activities.

BioCarbon shall ensure that personal data are processed only for the purposes for which they were collected or for purposes that are compatible with those originally established.

12 Legal Bases for Processing

BioCarbon processes personal data only where a lawful and legitimate basis for such processing exists.

Depending on the circumstances under which personal data are collected and processed, BioCarbon may rely on one or more of the following legal bases:

(a) *Consent*

Personal data may be processed where the data subject has provided clear and informed consent for the processing of their personal data for one or more specific purposes.

(b) *Contractual necessity*

Processing may be necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contractual relationship.

(c) *Legal or regulatory obligations*

BioCarbon may process personal data where such processing is necessary to comply with applicable legal, regulatory, or administrative obligations.

(d) *Legitimate interests*

BioCarbon may process personal data where such processing is necessary for legitimate organizational interests, provided that such interests are not overridden by the rights and freedoms of the data subject.

Where consent is required as the legal basis for processing, BioCarbon shall ensure that consent is obtained in a clear, informed, and voluntary manner and that individuals are able to withdraw their consent where applicable.

BioCarbon shall ensure that the legal basis for processing personal data is appropriate to the context in which the data are collected and used.

13 Data Sharing and International Transfers

BioCarbon may share personal data with third parties where such sharing is necessary for the administration, operation, governance, or oversight of its programs and systems.

Personal data may be shared with entities involved in the implementation and operation of BioCarbon programs, including but not limited to:

- (a) certification bodies and conformity assessment bodies responsible for validation and verification activities;
- (b) registry system administrators and operators responsible for maintaining registry platforms used for project registration and environmental credit management;
- (c) contractors, consultants, and service providers supporting BioCarbon's operational activities;
- (d) auditors, technical reviewers, or independent experts involved in program administration;
- (e) public authorities or regulatory bodies where disclosure is required by applicable law.

Where personal data are shared with third parties, BioCarbon shall take reasonable steps to ensure that such parties process personal data in a manner consistent with this Policy and applicable legal requirements.

Due to the international nature of BioCarbon programs, personal data may be transferred or accessed across different jurisdictions. In such cases, BioCarbon shall seek to ensure that appropriate safeguards are implemented to maintain an adequate level of protection for personal data.

Where applicable, BioCarbon may implement contractual safeguards, confidentiality obligations, or other appropriate measures to protect personal data during such transfers.

BioCarbon shall not disclose personal data to third parties for purposes unrelated to the activities and objectives of the organization unless required by law or authorized by the data subject.

Where appropriate, BioCarbon shall also ensure that third parties receiving personal data are subject to contractual or legal obligations requiring the protection, confidentiality, and lawful processing of such data.

Where BioCarbon engages external service providers or third parties that may process personal data in connection with BioCarbon activities, BioCarbon seeks to ensure that appropriate contractual, technical, and organizational safeguards are implemented to protect such data. The operational procedures governing the management of third-party processing, data transfers, and related safeguards are further described in the Data Protection Operational Procedures.

These arrangements may include service providers supporting registry infrastructure, information technology systems, or operational services required for the administration of BioCarbon programs.

13.1 Publication of Project Information through the Registry Platform

Where personal data are included in project documentation or registry records submitted in connection with BioCarbon programs, BioCarbon shall apply the principle of data minimization to determine the scope of information made publicly available through the registry platform.

BioCarbon distinguishes between information published openly for transparency purposes and personal data maintained on a restricted basis within the registry system. Personal data relating to natural persons, including identification numbers, personal contact details, and physical addresses, shall not be published openly through the registry platform unless required by applicable legal obligations or program rules, and only to the extent strictly necessary.

Where project documentation submitted to the registry contains personal data beyond what is required for public transparency purposes, BioCarbon shall take appropriate steps to ensure that such data are protected from unnecessary public disclosure, in accordance with the principles of data minimization, proportionality, and integrity and confidentiality established in this Policy.

14 Data Security and Confidentiality

BioCarbon is committed to ensuring the security and confidentiality of personal data processed in the course of its activities.

BioCarbon shall implement appropriate technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure. Such measures shall be proportionate to the nature of the data processed and the risks associated with the processing activities.

These measures may include access controls, secure system environments, encryption mechanisms where appropriate, and other safeguards designed to protect personal data from unauthorized access, misuse, alteration, or disclosure.

Access to personal data shall be limited to authorized personnel and third parties who require such access for legitimate operational purposes. Individuals who process personal data on behalf of BioCarbon shall be subject to appropriate confidentiality obligations and shall process personal data in accordance with this Policy and applicable legal requirements.

BioCarbon shall also adopt internal policies and procedures to support the protection of information systems and data assets, including policies related to information security, access control, and the responsible use of digital systems.

Where appropriate, BioCarbon may implement safeguards such as restricted access controls, secure data storage practices, and other measures designed to preserve the integrity and confidentiality of personal data.

All employees, collaborators, contractors, and authorized third parties handling personal data shall take reasonable steps to ensure that personal data are processed in a secure and responsible manner.

BioCarbon shall promote awareness and responsible practices regarding the protection of personal data across its organization and among individuals who process personal data on its behalf.

15 Privacy by Design and Data Protection Governance

BioCarbon adopts a privacy-by-design approach to the management and protection of personal data.

This means that privacy and data protection considerations are integrated into the design and operation of BioCarbon's systems, programs, processes, and organizational practices.

When developing new systems, technologies, operational procedures, or programmatic activities that involve the processing of personal data, BioCarbon shall take reasonable steps to ensure that:

- (a) data protection principles are considered from the earliest stages of design and implementation;
- (b) the collection and processing of personal data are limited to what is necessary for the intended purposes;
- (c) appropriate technical and organizational safeguards are incorporated into the design of systems and processes;
- (d) risks to the privacy and rights of individuals are identified and mitigated where appropriate.

This approach is intended to promote responsible data governance and to ensure that personal data protection forms an integral part of BioCarbon's operational framework.

BioCarbon shall seek to ensure that systems and operational processes collect and retain only the minimum personal data necessary for legitimate organizational purposes.

16 Personal Data Breach Management

BioCarbon shall take reasonable steps to identify, assess, and respond to incidents involving the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

Where a personal data breach or suspected breach is identified, BioCarbon shall take appropriate measures to contain the incident, assess its potential impact, and mitigate risks to affected individuals.

BioCarbon may maintain internal procedures for reporting, documenting, and responding to personal data breaches.

Where required by applicable law or where appropriate to protect the rights of affected individuals, BioCarbon may notify relevant supervisory authorities or affected individuals of a personal data breach.

BioCarbon shall also review incidents involving personal data breaches in order to identify potential improvements to its data protection practices and safeguards.

17 Rights of Data Subjects

BioCarbon respects the rights of individuals whose personal data are processed in connection with its activities.

Where applicable, BioCarbon seeks to align its practices with internationally recognized data protection standards, including the rights commonly recognized under frameworks such as the General Data Protection Regulation (GDPR).

Individuals whose personal data are processed by BioCarbon may exercise the following rights, subject to applicable legal and operational limitations.

The operational procedures for receiving and handling such requests are described in the Data Protection Operational Procedures.

17.1 Right of Access

Individuals have the right to request confirmation as to whether BioCarbon processes their personal data.

Where personal data are processed, individuals may request access to such data and may obtain information regarding:

- (a) the categories of personal data processed;
- (b) the purposes for which the data are processed;
- (c) the recipients or categories of recipients to whom the data may have been disclosed;
- (d) the anticipated period for which the data will be stored, where possible;
- (e) the safeguards applied in the case of international data transfers.

BioCarbon shall make reasonable efforts to provide such information in a clear and accessible manner.

17.2 Right to Rectification

Individuals have the right to request the correction of personal data that are inaccurate, incomplete, or outdated.

Where appropriate, BioCarbon shall take reasonable steps to verify the accuracy of the information and to update or correct the relevant personal data without undue delay.

BioCarbon may request supporting information where necessary to validate the requested correction.

17.3 Right to Erasure

Individuals may request the deletion of their personal data where:

- (a) the data are no longer necessary for the purposes for which they were collected;
- (b) the data subject withdraws consent where consent was the basis for processing;
- (c) the processing is no longer justified or lawful;
- (d) the personal data must be deleted to comply with applicable legal requirements.

BioCarbon may retain personal data where retention is necessary to comply with legal, regulatory, contractual, or legitimate organizational obligations.

17.4 Right to Restriction of Processing

Individuals may request that BioCarbon restrict the processing of their personal data under certain circumstances, including where:

- (a) the accuracy of the personal data is contested;
- (b) the processing of the personal data is considered unlawful;
- (c) the data are required for the establishment, exercise, or defense of legal claims.

Where processing is restricted, BioCarbon shall store the data but refrain from further processing unless necessary for legal or legitimate purposes.

17.5 Right to Object

Individuals may object to the processing of their personal data where such processing is based on legitimate organizational interests or where the processing affects their rights or interests.

Upon receiving an objection request, BioCarbon shall assess whether compelling legitimate grounds exist for continuing the processing of the personal data.

Where no such grounds exist, BioCarbon shall take reasonable steps to cease the processing of the relevant personal data.

17.6 Right to Data Portability

Where applicable, individuals may request that personal data provided by them be transmitted to another entity in a structured, commonly used, and machine-readable format.

This right applies primarily where the processing of personal data is based on consent or contractual necessity and where the processing is carried out by automated means.

BioCarbon shall make reasonable efforts to facilitate such requests where technically feasible.

Individuals whose personal data are processed by BioCarbon also have the right to lodge a complaint with the competent data protection supervisory authority in the jurisdiction where they reside or where the processing of their personal data occurs.

18 Requests, Complaints and Contact Mechanisms

BioCarbon shall provide reasonable mechanisms that allow individuals to exercise their rights in relation to the processing of their personal data.

Individuals who wish to request access to their personal data, request correction or deletion of their data, restrict processing, object to the processing of their personal data, or exercise any other applicable data protection right may submit

a request to BioCarbon through the contact channels designated for this purpose.

Requests may be submitted in writing through the official contact channels provided by BioCarbon, including electronic communication.

BioCarbon shall ensure that appropriate channels are available for the submission of queries, complaints, or requests related to personal data processing.

To ensure the protection of personal data and prevent unauthorized disclosure, BioCarbon may take reasonable steps to verify the identity of the individual submitting the request before processing such request, in order to prevent unauthorized disclosure of personal data.

BioCarbon shall review and respond to requests within a reasonable period of time, taking into account the nature and complexity of the request and any applicable legal or regulatory requirements.

Where a request cannot be fulfilled, BioCarbon shall provide a reasonable explanation of the reasons for such decision, where appropriate.

Individuals who believe that their personal data have been processed in a manner inconsistent with this Policy may submit a complaint through the same contact mechanisms. BioCarbon shall review such complaints and take reasonable steps to address any identified issues.

Where requests involve personal data relating to multiple individuals, BioCarbon shall take reasonable steps to ensure that the rights and confidentiality of other individuals are protected.

BioCarbon may also maintain internal records of requests received and responses provided in order to support accountability and compliance with applicable data protection obligations.

19 Data Retention

BioCarbon shall retain personal data only for as long as necessary to fulfil the purposes for which such data were collected or processed, or as required to comply with applicable legal, regulatory, contractual, or operational obligations.

The retention of personal data shall take into account several factors, including:

- (a) the purpose for which the personal data were collected and processed;

- (b) the nature and sensitivity of the personal data;
- (c) applicable legal or regulatory retention requirements;
- (d) contractual obligations between BioCarbon and relevant stakeholders;
- (e) the operational needs of BioCarbon programs and systems.

In the context of BioCarbon programs and registry systems, certain personal data may be retained for extended periods where necessary to maintain the integrity, traceability, and transparency of environmental crediting systems administered by BioCarbon.

This may include information related to:

- (a) project registration and certification processes;
- (b) validation and verification activities;
- (c) registry system operations;
- (d) issuance, transfer, or retirement of environmental credits;
- (e) contractual and institutional records related to BioCarbon programs.

BioCarbon recognizes that environmental crediting systems often require long-term recordkeeping in order to preserve the transparency and credibility of project documentation, program decisions, and registry transactions.

Where personal data are no longer required for the purposes for which they were collected, and where no legal, contractual, or legitimate organizational interest justifies their continued retention, BioCarbon shall take reasonable steps to securely delete, anonymize, or otherwise dispose of such data.

BioCarbon may establish internal data retention schedules and procedures to support the consistent and responsible management of data throughout their lifecycle.

All data deletion or disposal processes shall be conducted in a manner that preserves the confidentiality and security of personal data.

BioCarbon may maintain internal records and documentation describing its personal data processing activities in order to support accountability and compliance with applicable data protection laws.

Such records may include information regarding the purposes of processing, categories of personal data processed, categories of recipients of personal data, and applicable retention practices.

These internal records support the responsible governance of personal data throughout their lifecycle.

Confidentiality and data protection obligations established in this Policy shall survive the termination or expiration of any contractual relationship between BioCarbon and the relevant party for a period of five (5) years, unless a longer period is required by applicable law or by the nature of the personal data processed. During this period, personal data shall continue to be handled in accordance with the principles and safeguards established herein.

20 Policy Governance and Review

This Policy forms part of BioCarbon's governance framework for the protection of privacy and personal data.

BioCarbon shall take reasonable steps to ensure that this Policy is effectively implemented across the organization and that individuals who process personal data in connection with BioCarbon's activities are aware of their responsibilities under this Policy.

BioCarbon may establish internal procedures, guidelines, or supporting documents to facilitate the implementation of this Policy and to ensure the consistent and responsible handling of personal data within its programs and systems.

BioCarbon may maintain documentation and internal records demonstrating the implementation of this Policy and the organization's commitment to responsible data governance.

BioCarbon shall periodically review this Policy to ensure that it remains appropriate, effective, and aligned with evolving legal requirements, operational needs, and internationally recognized best practices related to privacy and personal data protection.

Reviews may also consider developments in BioCarbon's certification programs, registry systems, and international environmental market frameworks.

In this way, reviews of this Policy may take into account:

- (a) changes in applicable legal or regulatory frameworks;

- (b) developments in international data protection standards;
- (c) changes in BioCarbon's organizational structure, programs, or systems;
- (d) technological developments affecting the processing of personal data;
- (e) operational experience gained through the implementation of this Policy.

BioCarbon reserves the right to update or modify this Policy where necessary to reflect such developments.

Where significant changes are made to this Policy, BioCarbon may take appropriate steps to communicate the updated version through its official communication channels.

21 Entry into Force

This Privacy and Personal Data Protection Policy shall enter into force on the date of its formal adoption by BioCarbon.

This Policy replaces any previous internal policies governing the processing and protection of personal data within BioCarbon to the extent that such policies are inconsistent with the provisions set out herein.

This Policy shall remain in effect until amended, replaced, or withdrawn by BioCarbon.

22 Institutional Commitment

BioCarbon reaffirms its commitment to protecting privacy and ensuring the responsible management of personal data across all its programs, systems, and organizational activities.

BioCarbon's leadership supports the implementation of this Policy and promotes a culture of responsible data governance, transparency, and respect for the rights of individuals whose personal data may be processed in connection with BioCarbon's operations.