

# Privacy Policy

Date: 1st May, 2021

This Privacy Policy describes HALO Energy Limited (HALO)'s practices regarding the collection, use and disclosure of your Personal Data that we may collect from time to time when you use the Platform or Services. We take our obligations regarding your privacy seriously. By accessing or using our services and/or the Platform, you agree to this Privacy Policy and our Terms.

## 1. Personal Data is collected by us

- i. The types of Personal Data we may collect, from time to time, includes:
  - a. your full name and email address;
  - b. your mobile number and location;
  - c. your photograph or any other optional profile information (such as gender, date of birth, living district) voluntarily provided by you in relation to your User Account ("Profile Information");
  - d. any communications between you and HALO;
  - e. details of your visits to our Platform and your User Account activities;
  - f. Your Content that is submitted by you via your User Account; and
  - g. the information described in paragraph 2 below.
- ii. If you do not provide us with your full name and email address, then we cannot set up your User Account and you will be unable to use the Services.
- iii. When we request any other Personal Data from you, we will notify you at the time of collection as to whether or not it is mandatory for you to provide such Personal Data to us. If you do not provide any mandatory Personal Data to us, then we may not be able to: (i) process or complete your application for a User Account; (ii) provide you with the Services; (iii) process or complete your request to participate in any services or events; (iv) respond to any queries submitted by you; or (v) publish any of Your Content, as requested by you. Policy and the relevant personal information collection statement provided to you.

## 2. Information Collect Automatically

- i. We use technologies such as, but not limited to, cookies and pixel tags to provide, monitor, analyse, promote and improve the Event, Service and Platform. For example, a cookie is used to remember your user name when you return to the Event, Service or Platform, and to improve our understanding of how you interact with the Event, Service and Platform. You can block cookies on your web browser; however please be aware that some features of the Event, Service or Platform may not function properly if the ability to accept cookies is disabled.

### Log Files

- ii. When you use the HALO EV charging services, our servers automatically record certain information in server logs. These server logs may include

information such as your web request, Internet Protocol (IP) address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, mobile carrier, and other such information. Log files help us to monitor, analyze, improve and maintain the Service and to diagnose and fix any Service-related issues.

### **Location Information**

- iii. We may collect and process information about the location of the device from which you are accessing the Platform. Location data is not conveyed information about how you browse the Platform and used in conjunction with personally identifiable information. You can disable location based services in settings associated with the Service; however please be aware that some features of the Service may not function properly if location services are turned off.

### **3. How we use your Personal Data**

We will collect, retain and use your Personal Data in accordance with any express consent provided by you. Such purposes may include the following:

- i. processing and completing your application for registration of a User Account;
- ii. administering your User Account;
- iii. verifying your identity;
- iv. providing you with the Services and any other services requested by you;
- v. providing you with information regarding any Event, Services for which you have applied;
- vi. performing our obligations under any other agreement entered into between you and us;
- vii. enabling us to communicate with you in relation to your queries, feedback, complaints or claims, your User Account, your activities under your User Account, updated information related the usage of the Services for which you have applied or participated;
- viii. providing you with a more personalised experience in respect of the Platform, the Services or your User Account;
- ix. subject to you prior consent, providing you with promotional materials, unless you notify us in writing of your objection to receiving such promotional materials; and
- x. enforcing our rights against you in any legal proceedings, or to defend ourselves against any claim, in relation to you;
- xi. complying with applicable laws or regulations; or
- xii. for any other purpose that you have consented to and/or which has been notified to you on or before the time when the Personal Data is collected.

#### **4. Marketing Activities**

- i. We cannot use your Personal Data without your prior consent for the purposes of providing you with marketing materials. We also cannot transfer your Personal Data to any third parties for their use in direct marketing without your prior consent.
- ii. Subject to your prior consent, , we may use your name and email address to send you messages, announcements and/or information regarding:
  - a. the Platform or Services; or
  - b. any mentoring opportunities organised by us
- iii. Subject to your consent, we may transfer your Personal Data to specified NGOs or Social Enterprises to enable them to directly send you messages, announcements and/or information in relation to the activities of the NGO or Social Enterprise, any services, events or campaigns hosted or operated by the NGO or Social Enterprise.
- iv. You can exercise your right not to receive some or all of the Marketing Materials, or to not have your Personal Data transferred to the NGOs for marketing purposes, by checking the opt-out box on the relevant forms we use to collect your Personal Data. You can also opt-out of receiving any Marketing Materials at any time by notifying us in writing at the email address stated below, or through your User Account.

#### **5. How We Protect Your Information**

The security of your Personal Data is important to us. When you provide Personal Data through the Platform, we encrypt the transmission of any Personal Data that we deem to be particularly sensitive by using industry-standard encryption.

HALO uses commercially reasonable and industry-standard physical, managerial and technical safeguards to preserve the integrity and security of your Personal Data. For example, we continuously and regularly back-up your data to help prevent data loss and aid in data recovery. We also guard against common web attack vectors, we host data in secure data centres, and we have firewalls and access restrictions on our servers to secure our network and to better protect your Personal Data.

#### **6. Changes to Our Privacy Policy**

We may change this Privacy Policy at any time by posting the revised Privacy Policy in the 'Privacy' section of our Website. The revised Privacy Policy is effective immediately when posted on the Website.

It is the responsibility of each User to review the Website and the Privacy Policy periodically to learn of any revisions to this Privacy Policy. Your continued use of our Service and Platform after the effective date of such revisions will constitute your acknowledgment and acceptance of the terms of the revised Privacy Policy.

## 7. **Contact Us**

Please contact the Customer Service of HALO at [support@halo-e.co](mailto:support@halo-e.co), if you:

- a. have any questions regarding this Privacy Policy or the way in which we handle your Personal Data;
- b. wish to submit a request to access or correct your Personal Data held by us; or
- c. wish to withdraw your consent to the receipt of any Marketing Materials.