

Privacy Policy

1. PRIVACY POLICY

1.1 Solace (“**we**”, “**us**”, or “**our**”) respects your privacy and is committed to protecting it in accordance with applicable laws and regulations. This Privacy Policy describes how we collect, use, and share your personal information (“**Personal Data**”) when you access or use our website at <https://solacelaunch.com/> and any subdomain and/or sub-directory thereof, including <https://app.solacelaunch.com/>, tools, applications, smart contracts, application programming interfaces (“**APIs**”) (collectively, the “**Platform**”), or or any products, devices, services, content, webpages, information offered through the Platform (collectively, the “**Products & Services**”). By accessing or using the Platform, you acknowledge that you have read and understood this Privacy Policy. If you do not wish to be bound by the terms of this Policy, please refrain from accessing or using the Platform.

1.2 This Privacy Policy is an agreement between you and us, our subsidiaries and affiliated entities regarding the treatment of your Personal Data that you provide to us or acquired by us through your access to our Platform.

1.3 We may update this Policy at any time. Any changes will be indicated with a “Last Updated” date. Please check the Platform frequently to view any updates or changes to this Privacy Policy. Your continued access or use of the Platform after we have made any changes constitutes your acceptance of any new, amended or updated Policy.

2. PERSONAL DATA COLLECTION

2.1 We may receive and collect your Personal Data when:

- (a) You visit our Platform and/or register an account with us;
- (b) You contact us through telephone, e-mail, customer support, social media or our Platform;
- (c) You fill forms on our Platform requesting demonstration of our Products & Services or for joining our mailing lists;

- (d) You respond to any e-mails or letters that we may send or any surveys that we may conduct;
- (e) You access or utilize our Platform or any Products & Services; and
- (f) You enter into agreements with us or are referred to us by any of our business partners or third parties.

2.2 We may collect personal, financial, technical, legal and other data relating to you, including but not limited to the following:

- (a) Data required to create an account on our Platform, such as your name and a valid email address;
- (b) Your emergency contact details;
- (c) Your preferences such as favourite artists and languages;
- (d) Any input you provide to the Platform, via written messages, journal entries, attachments, voice recordings, or wellness assessments, quizzes, or similar tools, or in such other manner which may be made available to you,
- (e) Information regarding the execution of contracts, consents or agreements with regards to the use of our Products & Services; and
- (f) Information about your visits to and use of the Platform to help us maintain the appropriate features, functionality and user experience.

2.3 We do not collect more Personal Data than is necessary for the purposes for which they are collected.

2.4 Your communications with us are not covered by legal privilege. Unlike conversations with licensed professionals, your interactions may be disclosed to authorities or other third parties, if required by law. Please do not share sensitive personal information with us that you consider confidential.

3. PERSONAL DATA STORAGE

3.1 We shall implement commercially reasonable safeguards to securely store Personal Data, using our offline and online technological capabilities, as appropriate. However, no method of transmission over the internet or method of electronic storage is completely secure, and we cannot guarantee absolute security. You should therefore exercise caution when deciding what Personal Data to share with us. We are not responsible for any unauthorized access to or circumvention of privacy settings, security measures on the Platform, or third-party websites.

3.2 We will keep Personal Data for as long as necessary, in accordance with this Privacy Policy and as required by any applicable law, and once this time period has expired, we will delete such Personal Data accordingly.

4. WEB-RELATED INFORMATION COLLECTION

4.1 When you visit our Platform, we may send one or more cookies to your device. "Cookies" are small text files containing a string of alphanumeric characters that may be placed on your web browser when you visit our Platform that may convey to us anonymous information about your preferences and how you browse our Platform. However, cookies do not collect your Personal Data.

4.2 We use cookies when you sign in to keep track of your personal session, including some account identifiers, so that we can ensure that you are the only person making changes to your account. We also use cookies to track your activity, as a unique person, on our Platform.

4.3 All of this information is only stored in an encrypted form. You can adjust the settings on your web browser such that you are informed when cookies are used or to prevent cookies from being used. Please note, however, that if you decline to use cookies, our Platform's performance may be affected or you may be prevented from using some of our Products & Services.

4.4 In addition, we may also collect technical information related to your use of our Products & Services. This may include, but is not limited to:

- (a) Information regarding the web pages of our Platform which you have accessed;
- (b) Types of content that you view or engage with, the features you use and the actions you take, as well as your time zone, country, the dates and times of access, user agent and version, type of computer or mobile device, and your computer connection;

- (c) The frequency of such access;
- (d) Name of the device, operating system, and device identifiers you are using;
- (e) Your product and service preferences;
- (f) Your Internet Protocol (IP) address;
- (g) Your browser type and version;
- (h) Your internet service provider (ISP);
- (i) Your operating system;
- (j) Referring or exit pages;
- (k) The dates and times that you visit our Platform; and
- (l) The search terms you enter on our Platform.

4.5 Such technical data may be used for administrative purposes to assess the usage, value and performance of our Products & Services and with a view of improving user experience. As with cookies, the web surfing information collected is aggregated, anonymous “click stream” and transactional data, and is not associated with any users as individuals.

5. PURPOSES OF COLLECTING PERSONAL DATA

5.1 The Personal Data we collect is required for legal, compliance or security purposes. Where possible, we shall inform you of the specific purpose for which such Personal Data is being collected.

5.2 We may use the Personal Data collected on our Platform for the following purposes:

- (a) For the specific purpose for which the information was volunteered;
- (b) To provide you with the Products & Services;
- (c) To enable the service providers, legal and tax advisors, fund administrators and other relevant persons that we have appointed to continue to fulfill their obligations or provide services in respect of our Platform, including but not limited to processing users’ Personal Data for purposes such as legal, regulatory, audit and tax analysis, compliance, anti-money laundering/counter-terrorist financing checks and due diligence;

- (d) To provide you with alerts, newsletters, education materials or information that you have specifically requested;
- (e) Promoting and marketing services and products subject to your right to opt-out;
- (f) To communicate with you and respond to your queries;
- (g) To process your application, inquiry or request;
- (h) To verify your identity, conduct know-your-customer and other due diligence checks, as may be required;
- (i) To guard against potential fraud and other illegal activities;
- (j) To maintain regular communications with you as may be necessary to inform you of Platform or Products & Services updates;
- (k) To conduct surveys, research and statistical analysis with the aim of helping us monitor or improve our Products & Services;
- (l) To comply with the applicable laws or inquiries from regulatory authorities and enforcement agencies or in respect of legal proceedings; and
- (m) For any other purpose permitted by the applicable laws.

5.3 We may also use a variety of online analytics products to help us analyze how you and other users use our Platform, with the aim of enhancing the user experience.

6. WHY YOU SHOULD PROVIDE US WITH PERSONAL DATA

6.1 In order to access/utilize our Products & Services, you need to voluntarily provide us with your Personal Data. It may be absolutely impossible for us to provide you with certain Products & Services in the absence of certain key Personal Data about yourself. You acknowledge that if you withdraw your consent for us to process your Personal Data, then you acknowledge that we may exercise any rights we may have to refrain from or discontinue providing you with any or all of our Products & Services.

7. THIRD PARTY DATA

7.1 In the course of utilizing our Products & Services, you may have to disclose Personal Data relating to third parties. When making such disclosure to us, you represent to us that you have

the authority to disclose such Personal Data for the purpose for which it may be required or any other purpose as mentioned in this Privacy Policy.

8. MINORS

8.1 Our Products & Services are not directed at persons under the age of majority. We do not knowingly collect data from anyone under the age of majority. If we discover such data has been collected, we will delete it promptly. If you are a parent or guardian and you become aware that your child has provided us with Personal Data without your consent, please contact us.

9. HOW WE SHARE YOUR INFORMATION

9.1 We do not sell users' Personal Data to third parties. We do, however, work with a number of trusted third parties who perform vital functions as part of our operations.

9.2 We may engage third parties to help us to carry out certain other internal functions such as account processing, client services or other data collection relevant to our business. By using our Platform or Products & Services, you consent for us to disclose your Personal Data to such third parties. Your Personal Data shall be shared with these third parties only to the extent necessary, including but not limited to providing Products & Services to you, making our Products & Services available to you or acting on your instructions. Such third parties shall be required to comply with any applicable data protection laws.

9.3 We may also share your Personal Data in the following circumstances:

- (a) With law enforcement or other government agencies;
- (b) As required by applicable laws;
- (c) For preventing, detecting or investigating offences;
- (d) For preventing injury or damage, including in respect of our rights, property or personal safety or the rights, property or personal safety of Users or other persons;
- (e) If you disclose information suggesting risk of self-harm or mental distress, we may provide crisis hotline information but we are not a crisis service and cannot guarantee real-time intervention;
- (f) To comply with any judicial proceeding, order of a court or legal process;

- (g) To assist government enforcement agencies;
- (h) For obtaining legal advice or in respect of legal proceedings;
- (i) To take precautions against liability, to investigate and defend against any third-party claims or allegations;
- (j) To prevent or limit fraud;
- (k) To protect the security or integrity of our Platform or our Products & Services;
- (l) To protect our rights, property or personal safety or of any other person;
- (m) To facilitate any strategic transactions, business transfer, acquisition, reorganization, bankruptcy, receivership, or transition of service to another provider that we may be involved in;
- (n) With you or any person acting on your behalf; or
- (o) Made at your request or with your consent or the consent of any person acting on your behalf.

9.4 Where feasible, we anonymize or aggregate Personal Data to protect your privacy.

10. NOTIFICATIONS AND COMMUNICATIONS FROM OUR PLATFORM

10.1 We may send you email notifications from time to time. These shall typically relate to your activities on our Platform or changes to various legal agreements or user policies. By using our Products & Services, you consent to receiving such Products & Services-related emails.

10.2 From time to time, we may also send surveys, requests for feedback, marketing offers or newsletters. Completing any surveys or requests for feedback or accepting any offer is strictly voluntary. If you do not wish to receive these offers, surveys or feedback requests, please select the opt-out option in any such survey, request, offer or newsletter you may receive from us.

11. LINKS TO OTHER PLATFORMS

11.1 Our Platform may contain links to other websites which we do not maintain. If you follow any links that direct you away from our Platform, this Privacy Policy shall not apply to your activity on the other websites you visit. We do not control the privacy policies or the privacy practices of any

third parties. We encourage you to review each website's privacy policy before disclosing any Personal Data on those websites.

12. TRANSFERRING INFORMATION OVERSEAS

12.1 Personal Data collected through our Platform may be transferred, stored and processed outside the jurisdiction where we will safeguard your Personal Data, according to the applicable laws in such circumstances. By providing your Personal Data and using our Platform, you consent to any such transfer of information.

13. SECURITY POLICY

13.1 We shall limit access to your Personal Data to only our employees, contractors, representatives and/or third parties, as necessary, according to our legitimate business needs. We shall conform to industry standards and practices and maintain appropriate physical, electronic and procedural safeguards and controls to protect your Personal Data.

13.2 We shall treat the protection of your Personal Data with due regard and we shall take the appropriate security measures to prevent any unauthorised access to, or alteration, disclosure or destruction, or any accidental loss or destruction of your Personal Data. Unfortunately however, the transmission of information via the internet may not be completely secure due to factors beyond our control. Although we shall endeavour to do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted through our Platform. In this regard, kindly beware that any Personal Data you choose to provide us with is at your own risk.

13.3 If your Personal Data is compromised as a result of a breach of our security measures, we shall promptly notify you of such a breach.

13.4 We will never send you an email asking you for your login information. In general, you can protect yourself against phishing by never providing personal or login information via a link contained in an email. Instead, please access our Platform directly.

14. RETENTION OF YOUR PERSONAL DATA

14.1 We shall retain your Personal Data in an accurate form and for as long as you continue to use our Products & Services and our Platform, and/or in compliance with the applicable laws. We

apply data minimization principles and retain personally identifiable data only for as long as necessary.

15. GDPR

15.1 For the residents of the European Economic Area (“**EEA**”) or United Kingdom (“**UK**”) (collectively, the “**EEA/UK Users**”), we shall process your Personal Data in compliance with the EU General Data Protection Regulation 2016/679/EU (“**GDPR**”). We will be the Data Controller (as defined under GDPR) and in certain circumstances, EEA/UK Users will have certain rights, including the following:

Access to information

15.1.1 The GDPR gives EEA/UK Users the right to find out whether we are processing their Personal Data and, where that is the case, to receive a copy of the Personal Data we process. We will endeavor to provide EEA/UK Users with an account of their Personal Data in our possession or control within a reasonable time. Such accounts shall be in respect of how their Personal Data has been or may have been generally used or disclosed.

15.1.2 We reserve the right to charge EEA/UK Users a reasonable administrative fee for carrying out such a request. Where EEA/UK Users’ Personal Data is inseparable from the Personal Data of other Users, we reserve the right to withhold EEA/UK Users’ Personal Data if permitted by applicable law.

Right to request rectification or erasure of Personal Data

15.1.3 EEA/UK Users have the right to request to amend any of their Personal Data at any time if inaccurate. If any of their Personal Data is incomplete, EEA/UK Users have the right to have such Personal Data rectified. EEA/UK Users also have the right to require us to delete their Personal Data as soon as possible, by [emailing](#) us, in one of the following circumstances:

- (a) The Personal Data is no longer necessary for the purposes of which such Personal Data was collected or otherwise processed;
- (b) The Personal Data has been unlawfully processed;
- (c) The Personal Data must be erased for compliance with our UK or EU legal obligations;
- (d) The Personal Data relates to a child under the age of 18;

- (e) An EEA/UK User objects to us processing the EEA/UK User's Personal Data and we have no overriding legitimate grounds for the processing; or
- (f) An EEA/UK User withdraws the EEA/UK User's consent to us processing the EEA/UK User's Personal Data and we have no other legal grounds for processing the EEA/UK User's Personal Data.

15.1.4 Please note that it may take up to 30 days for any such request to be reflected in our systems.

Right to restrict Personal Data

15.1.5 EEA/UK Users have the right to request to restrict the processing of Personal Data if EEA/UK Users object to us processing their Personal Data and we have no overriding legitimate grounds for the processing or EEA/UK Users think that such Personal Data is inaccurate, that we are processing such Personal Data unlawfully, or that we no longer need such Personal Data for the purposes for which such Personal Data was collected. While we consider such a request, we will stop processing such Personal Data within a reasonable time from the date we receive the request. We will notify EEA/UK Users of our decision and any justifications for continuing to process such Personal Data as soon as we can.

15.4 Right to withdraw consent

15.1.6 If we process EEA/UK Users' Personal Data with such EEA/UK Users' consent, such EEA/UK Users have the right to withdraw their consent at any time. This will not affect the legality of our processing of such Personal Data up until the point at which consent was withdrawn. Please also note that we may still need to process such Personal Data on other grounds, for example to fulfill a contract with such EEA/UK Users or as required by law.

Right to object

15.1.7 EEA/UK Users have the right to object, at any time, on grounds relating to their particular situation, to the processing of their Personal Data. If we cannot demonstrate compelling legitimate grounds to continue processing such Personal Data, such processing will cease.

Right to data portability

15.1.8 EEA/UK Users have the right to request that we transfer their Personal Data that we have collected to another organization, or directly to them, under certain conditions.

16. ACCESSING YOUR RIGHTS

16.1 If you wish to withdraw your consent to any or all use of your Personal Data, or request any amendment to, or restriction or erasure of, such Personal Data, or exercise any other of your rights, please [email](#) us. We will endeavor to respond to all verified data requests within 30 days or as otherwise required by law.

16.2 Do note that if you withdraw your consent to any or all use of your Personal Data or request for erasure of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide Products & Services to you, or administer any contractual relationship already in place between you and us. Any withdrawal of consent or request to erase your Personal Data may also result in the termination of any agreement you may have with us. Our legal rights and remedies in such an event are expressly reserved.

16.3 You may make a request to access and be supplied with a copy of your Personal Data kept by us. However, we may refuse any such request if there are reasons to do so, in accordance with the applicable laws.

16.4 By giving or making available your Personal Data, you expressly agree and consent to the collection, use, processing and disclosure of your Personal Data in accordance with the terms of this Privacy Policy, including but not limited to, consenting and receiving communications and materials from us from time to time.