

Privacy Notice

Effective Date: January 1, 2024 Solvation LLC (“Solvation”, “we”, “us” or “our”) is committed to protecting and respecting your privacy. This notice informs you of our practices regarding the collection, use and disclosure of personal information we receive from users of our website, www.solvation.llc (“website”).

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1. Scope of this Privacy Notice

This Privacy Notice applies to anyone who interacts with us on our website. This Privacy Notice provides details about the personal information we collect about you including how we use it as a personal information controller, how we protect it, and your rights as an individual in relation to its collection, storing, and processing. We may also provide you with further legal information and/or privacy notices as necessary, depending on the way we interact with you and the services we provide to you.

2. How We Collect Personal Information

We may collect personal information about you from various interactions on our website. These interactions may include filling in a webform or signing-up for newsletters, or other marketing materials. We may also collect personal information from you in relation to employment/job placements, or feedback on our services. Although we collect information during your interactions with our website, which is shared with our Website service providers, this is in an anonymous, aggregated or pseudonymized form which does not focus on you individually (see “Cookie Notice” section below for more information).

3. Categories of Personal Information We Collect

We may collect various categories of personal information from you, which may include:

- Contact information, such as your name, email address, and phone numbers.
- Data used by our website service providers or for Website analytics and research, that is used to evaluate, provide, protect, or improve our website and service offerings. This combined personal information may include IP addresses, preferences, web pages visited prior to coming to our Website, information about browser, network, or device (such as browser type and version, operating system, internet service provider, preference settings, unique device IDs and language and other regional settings), and information about how you interact with our Website (such as timestamps, clicks, scrolling, browsing times and load times).

4. What We use Personal Information For

We use the personal information we obtain about you (and may share it with our service providers, our clients, or other third parties) where we have legal basis to do so, for us to:

- Communicate with you, including by sending you emails related to employment, marketing, and service-related announcements.
- Perform marketing or offer relevant details and informational updates related to our services.
- Administer surveys, contests, and other promotions.
- Manage our partner, service provider, or customer relationships.
- Analyze your interactions with our services so we can advertise or promote additional service offerings to you where we have legal basis to do so.
- Undertake activities to verify or maintain the quality of the services being provided, including to handle and respond to complaints or questions.
- Detect, investigate, and prevent activity we think may be potentially illegal, unlawful, or harmful and to enforce our Privacy Policy and/or our terms or any other purpose referenced herein or therein.
- Act in the public interest, in line with any laws that apply.
- Comply with applicable legal requirements, such as other government regulations and industry standards, contracts, and law enforcement requests.

5. Legal Basis for Collecting and Using Your Personal Information

We process your personal information for the above purposes when we have a legal basis to do so. This could include:

- You have consented to the use of your personal information in a particular way. When you consent, you can change your mind at any time. Details of how to exercise your rights are set out in the “Your Privacy Rights” section below.
- We need your personal information to provide you with services and products requested by you, or to respond to your inquiries.
- We have a legal obligation to collect and/or use your personal information, such as to comply with applicable government regulations or to comply with a court order or law enforcement request.

Considering applicable laws as well as your individual interests, rights, and freedoms, we may also collect or use personal information for several legitimate interests. These legitimate interests may include:

- To manage our relationship with you, and any service providers who provide products or services for us (for example, to provide any relevant marketing, etc.).
- For research and analysis so that we can monitor and improve our services and Website.
- To enforce or apply our policy terms and conditions or other contracts, or to protect our (or our customers’ or other people’s) rights, property, or safety.
- To exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the third parties we work with.
- To take part in, or be the subject of, any sale, purchase, re-structuring, merger or takeover of all or part of our business.

6. Collection of Personal Information from Minors

Our website is not designed or intended to attract children under 16 years of age, and we do not knowingly collect information from minors. By using our Websites, you hereby represent that you are at least the age of legal majority in your place of residence.

7. Links to Third-Party Websites

Our websites may also contain links to and marketing from the websites of third parties. We have no control over the content or operation of these websites, nor do we control the confidentiality or privacy practices of the website operators. Consequently, any personal information you submit through such website is governed by the privacy policies of the website in question. It is therefore your responsibility to find out about the third-party policies to protect your personal information when visiting these third-party websites.

8. Marketing and Preferences

We may use your personal information to send you marketing through various channels (mail, phone, social media, email, or text) however, we only use your personal information to send you marketing material if we have your permission or a legitimate interest, as described above in the “Legal basis for Collecting and Using Your Personal Information” section. If you do not want to receive direct marketing from us, you may have the right to object – for example opting out by clicking on any ‘unsubscribe’ links that appear in emails we send or contacting us at privacy@solvation.llc to update your contact and marketing preferences.

9. Sharing Your Information

We may disclose to third parties, including our clients and service providers, any of the categories of personal information outlined in the “Categories of Personal Information We Collect” section above, where we have legal basis to do so. However, we normally share only the minimum relevant personal information that is required to fulfil the business purpose for sharing. We may disclose, or may have disclosed, personal information to the following categories of third parties:

- Clients and prospective clients – for example, clients may request professional and employment-related information for purposes of evaluating our consultants’ skills, qualifications, and experience. Clients may also need to approve and process timesheet information for consultants and contractors and collect other personal information relevant to the client project.
- Service providers who perform business functions and services on our behalf such as the provider of our customer relationship management software, or our website.
- Regulatory authorities, government authorities, courts, or other third parties wherever legally required of us or if we reasonably believe that such action is necessary and can be taken legally to protect the safety, rights, or property of Solvation, our employees, our clients and service providers, any other third-party affiliates, national security, or the general public;
- Any third parties who are involved in or the subject of any sale, purchase, restructuring, merger or takeover of all or part of our business.

Please note that Solvation does not sell your personal information and has not sold any personal information.

10. Protection of Personal Information

We use reasonable administrative, technical, and physical safeguards to protect your personal information – taking care of the integrity and availability of the personal information and avoiding its damage, loss, alteration, destruction, or unauthorized use. Personal information collected about you will be handled only by authorized personnel and in compliance with applicable laws and regulations to ensure it is appropriately safeguarded. However, no safeguards can be guaranteed to be 100% effective in securing all personal information across all the environments, which includes Solvation, our service providers, and our clients. If you have reason to

believe that your or others' personal information is no longer secured appropriately, please immediately notify us at privacy@solvation.llc.

11. How Long We keep Your Personal Information

Whenever we collect, use, or store your personal information, we keep it for as long as is necessary for the purpose for which it was collected, unless there are legitimate business, legal, or regulatory compliance reasons for retaining the personal information for a longer period of time.

12. Processing in the United States and Internationally

We are headquartered in the United States and we will process your personal information in the United States. Your personal information will be transferred to and stored in the United States. If we transfer personal information outside of the European Economic Area (EEA) we will implement appropriate and suitable safeguards to ensure that such data will be protected as required by applicable data protection law.

13. Cookies Notice

A cookie is a small piece of data that a website, when visited by a user, asks your browser to store information on your device to remember you, such as your language preference. We do not use cookies on our website with the intention to collect your personal information. We use "third-party" cookies, which are cookies from a website domain other than our website. These are used for our website analytics, site functionality, marketing efforts, and to share data with the relevant third parties. If you do not want cookies to be placed to gather data related to your website usage, most browsers allow you to automatically decline cookies, or be given the choice of declining or accepting a particular cookie (or cookies) from a particular site. If, however, you do not accept cookies, you may experience some inconvenience or a loss of certain features in your use of our website.

14. Your Privacy Rights

Depending on the jurisdiction you reside in, you may have certain rights in relation to the personal information we have collected about you, such as:

- Right to Know – You may have the right to request certain details regarding the personal information collected from them. Such details may include the following:
 - The categories and specific pieces of personal information collected,
 - The categories of sources from which the personal information is collected.
 - The business or commercial purpose for collecting, selling, or sharing the personal information.

- The categories of third parties to whom Solvation discloses personal information.
- The categories of personal information that have been “sold”, “shared”, or “disclosed for a business purpose” as well as the categories of third parties to whom the personal information was sold to, disclosed to, or shared with.
- Right to Deletion – You may have the right to have certain personal information deleted from our records.
- Right to Opt-Out – You may have the right opt-out of the sale or sharing of their personal information.
- Right to Rectification – You may have the right to request that Solvation correct inaccurate information about them.
- Right to Restriction of Processing – You may have the right to limit the use or disclosure of sensitive personal information under limited circumstances.

These rights are not absolute and do not always apply in all cases. We will let you know in our correspondence with you whether and how we will be able to meet your request relating to your rights and will never discriminate against or provide discriminatory treatment to any individuals exercising their privacy rights under applicable regulations. If we are not able to meet your privacy rights request, we will explain why, and provide details of any further action you may take. To make a request related to the above privacy rights, please contact us by email at privacy@solvation.llc . EU Residents have the right to lodge a complaint with the relevant data protection authority where you think we have not used your personal information or met your rights in accordance with relevant data protection law. You can find the contact information for the EU Data Protection Authorities here: https://edpb.europa.eu/about-edpb/board/members_en.

15. Questions and Contacts

We hope this Privacy Notice has been helpful in setting out the way we handle your personal information and your rights to control it. For any questions or comments in relation to this privacy notice and our privacy practices, please contact us by email at privacy@solvation.llc .

16. Changes to Our Privacy Notice

We will review and may make updates to our privacy practices from time to time. If we review and/or make any material changes to our privacy practices, we will update this privacy notice and change the effective date of the notice.