

## Privacy Policy

Updated: August 15, 2023

### INTRODUCTION

CapTech Ventures, Inc. (“CapTech” or “we” or “us”) is committed to your rights to privacy. This Privacy Policy (“Policy”), effective as of the date above, is designed to inform you about your rights and how we collect, use and share your personal data in conjunction with your use of our mobile application, VISTAR (<https://www.captechconsulting.com/industries/energy-utilities/vistar>). Your use of VISTAR indicates your acceptance and agreement with this Privacy Policy and any updates. If you are using VISTAR on behalf of any business, organization, or other entity, you warrant that you are authorized to bind such entity to this Policy and to accept them on the entity’s behalf.

We reserve the right to amend this Policy at any time with or without notice. However, please be assured that if the Policy changes in the future, we will not use the Personal Data (as defined below) you have submitted to us under this Policy in a manner that is materially inconsistent with this Policy without your prior consent.

Any questions you have concerning this Policy may be directed to [Privacy@captechconsulting.com](mailto:Privacy@captechconsulting.com).

### INFORMATION WE COLLECT

We may collect information from and about you, including information that you provide and automatically collected information. CapTech seeks only data relevant to the core functionality of VISTAR.

#### Information You Provide to Us

In using VISTAR, you may be asked to submit certain information directly to us. This information may include personal information. This includes any personally identifiable information such as:

- **Identifiers.** Your name, title, address, telephone number, and email address.
- **Information to verify your account.** Including your employer, proof of identity, or age.
- **Information you submit in support requests and correspondence.** Such as troubleshooting and other issues.

#### Automatically Collected Information

- **Usage Information.** We collect information regarding your use of VISTAR, such as device type, operating system, and frequency of use.

- **Geolocation Information.** We collect information about your approximate location when you use VISTAR’s visualization feature to create virtual landscapes and see visuals of equipment set up options.
- **Camera Data.** Such as when you use your device’s camera or upload screenshots or photos.

(Collectively, “Personal Data”).

## HOW WE USE YOUR INFORMATION

We use your information for the limited purposes set forth in this Policy.

- To administer VISTAR or to make improvements;
- To fulfill your requests for information or technical support;
- To help us detect abuse, fraud, or illegal activity in using VISTAR;
- To verify your identity to use VISTAR or in other instances where verification may be required;
- To communicate with you, including to notify you of updates or changes to VISTAR or this Policy;
- To respond to legal inquiries or other lawful purpose;
- To enforce this Policy or any other agreement we have with you; or
- For any other purpose we disclose to you at the time we collect your information and obtain your consent.

## THIRD PARTIES AND INFORMATION WE SHARE

Other than as set forth above, CapTech will not collect or use your Personal Data about you when you use VISTAR, unless you choose to provide such information to us, nor will such information be sold or otherwise transferred to unaffiliated third parties without your approval at the time of collection.

Additionally, third party vendors may help us administer VISTAR, communication with you or others, comply with regulations, or deliver services. We may share your data with them in support of any of these goals. However, prior to doing so, we obtain assurances from our vendors that they will safeguard your Personal Data. There may be other limited instances where we need to share your Personal Data in order to respond to your request or inquiry.

We also use Google services in administering VISTAR, including to help provide you with more precise coordinates when using VISTAR.

## **YOUR CHOICES, ACCESS, CORRECTION, AND DELETION**

To process your Personal Data, we typically rely upon your consent, contract performance, our legitimate business interest, or compliance with law. You may object to or restrict our processing of your Personal Data. You may withdraw any prior consent you may have given to Process Personal Data at any time. It is also within your rights to refuse to provide any Personal Data we request. However, refusal to provide certain Personal Data may limit your access to information or use of VISTAR.

Should you wish to access or amend any Personal Data you may have provided us or if you wish to request deletion, please contact at [Privacy@captechconsulting.com](mailto:Privacy@captechconsulting.com). Your Personal Data will be deleted or blocked from our database at your request.

## **HOW DO WE PROTECT YOUR INFORMATION AND SECURE INFORMATION TRANSMISSIONS?**

CapTech safeguards your Personal Data by regularly assessing its systems and taking commercially reasonable steps to make it as secure as possible. Despite the security measures we have implemented, it is well-known that Internet data transmission and electronic data storage are not 100% safe. As such, CapTech cannot and does not warrant the security of your Personal Data.

Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk. Some of the information you may enter on VISTAR may be transmitted securely via a secure medium known as Secure Sockets Layer, or SSL.

## **RIGHTS OF CERTAIN TYPES OF USERS**

Subject to applicable law, you may have certain rights regarding your Personal Data. To learn more about the Personal Data we collect about you or the rights you may have, please contact us at [Privacy@captechconsulting.com](mailto:Privacy@captechconsulting.com). These rights may include the following rights to (1) access or correct your Personal Data (2) request the deletion of your Personal Data, (2) request to opt out of certain processing or another restriction on the processing of your Personal Data, (3) request a portable form of your Personal Data, (4) object to the processing of your Personal Data, or (5) exercise other rights with respect to your Personal Data.

The law requires that we validate the identity and legal authority associated with Personal Data requests, including for users residing in states granting additional rights. As a result, we may require that you take additional steps to validate your identity and legal authority. Your request will be

considered validated once you have completed the validation process or submitted additional information as requested. Should you fail to confirm your request within the relevant timeframe and/or fail to provide the additional information requested, your request will be considered unvalidated and closed.

We will provide a response to any Personal Data request within the timeframe required by law. If we cannot substantively respond to your request in a timely manner, we will notify you and provide the reason for the delay.

Under certain circumstances, we may not be able to fulfill your request, such as when doing so would interfere with our regulatory or legal obligations, where we cannot verify your identity, or if your request involves disproportionate cost or effort. But we will respond to your request within a reasonable time, as required by law, and provide an explanation.

While we strongly encourage you to first raise any questions or concerns about your Personal Data directly with us, you may have a right to lodge a complaint with the relevant supervisory authority.

For users residing in California, Colorado, Connecticut, Virginia, or Utah, state law grants you additional rights under applicable law. You or your legally designated representative may submit a request to exercise your rights by contacting us at [Privacy@captechconsulting.com](mailto:Privacy@captechconsulting.com).

For users residing outside the U.S., CapTech does not market for direct sale to customers in regions outside the United States, including the European Economic Area (EEA), Switzerland and the United Kingdom (UK). If you provide Personal Data through VISTAR, you understand that your Personal Data will be transferred to and processed in the United States of America and any other country or jurisdiction at our sole discretion. The laws that apply to the use and protection of personal information in the United States or other countries or jurisdictions in which we transfer or process personal information may be different from the laws and protections in your country.

## **CHILDREN'S POLICY**

VISTAR is not intended for individuals under 18 years of age, nor do we knowingly market or sell any of CapTech's goods or services to persons under the age of 18. Accordingly, we do not knowingly process Personal Data from anyone under 18 years of age and anyone under 18 years of age should not submit any Personal Data to CapTech. If we become aware that personal information has been collected on VISTAR from a user under the age of 13, we will delete this information and terminate

the associated account. If you believe there is a user who is below the age of 13, please contact us at [Privacy@captechconsulting.com](mailto:Privacy@captechconsulting.com).

## **OTHER COMMUNICATIONS AND RIGHTS**

CapTech seeks your consent before contacting you via telephone/text or by email. Specifically, by e-signing your name and checking the box labeled YES where you provide your contact information, you are authorizing CapTech and/or its service providers to contact you via email or at the number you listed via phone or text (SMS), including (as necessary) using automated dialing technology regarding your business with us. No purchase is required. Separate message and data rates may apply. To opt-out at any time you may reply STOP to any CapTech text message. We acknowledge that this consent may be revoked at any time, but that until such consent is revoked, you may receive calls and text (SMS) messages from CapTech. We have provided an “Unsubscribe” link at the bottom of any such email or communication and will promptly fulfill your request to opt-out/unsubscribe to these communications.

## **REQUESTS, RECOURSE, ENFORCEMENT, AND LIABILITY**

Complaints and issues escalated to CapTech will be responded to promptly, especially regarding any data breach, but in any event within 30 days of receipt. CapTech will investigate any complaints and issues, attempting to promote expedited resolution. To escalate any issue or complaint, please contact [Privacy@captechconsulting.com](mailto:Privacy@captechconsulting.com).