



PRIVACY NOTICE

IMPORTANT LEGAL INFORMATION

Hallow Energy is committed to the protection of personal data and recognizes the importance of your rights to privacy and control over your personal information. In a landscape of evolving privacy standards and expectations, we remain dedicated to adhering to all applicable laws and regulatory requirements, as detailed in this Notice. This Privacy Notice (“Notice”)—together with our Terms of Use and any referenced documents—sets out how Hallow Energy Corp., located at 7918 Jones Branch Dr, McLean, Virginia, USA, 22102, collects, uses, stores, and processes your personal data. As the designated data controller under applicable data protection legislation, Hallow Energy aims to clearly explain what personal data we collect, how we use and manage it, and the rights you have in respect of such data. By accessing our websites or otherwise providing us with your personal data, you are encouraged to read this Notice in full to ensure you understand and agree with our data handling practices.

1. Personal Data We Collect

We do not actively collect personal data from users or visitors of our website, except for the contact details (such as email addresses) you voluntarily provide. In the case of suppliers, customers, contractors, employees, consultants, or their representatives, we retain personal data only for the duration of the business relationship. Once that relationship concludes, the data is deleted and not shared with third parties under any circumstances.

2. How Personal Data Is Collected

We collect personal data that you knowingly and voluntarily provide, whether online—such as through forms on our website—or offline, such as during visits to our premises or through communications via telephone, video conferencing, email, social media platforms, third-party applications, or similar technologies.

We may also collect certain technical information automatically through your device when you interact with our website.

3. Types of Personal Data Collected

In the context of our business operations, Hallow Energy may collect the following categories of personal data:

- Identifying information (e.g., name, gender, job title)
- Contact details (e.g., email address, postal address, phone number)
- Official identification (e.g., photographic ID)
- Employment-related details (e.g., Resumes, job applications)
- Financial or payment-related information
- Business-related interests and communications (e.g., meeting notes)



When you visit our website (<https://www.hallowenergy.com>), we may collect technical data transmitted by your browser, such as IP address, browser type, operating system, language preferences, time zone, access time, and referring URLs.

We may also collect data submitted through website forms, correspondence you initiate with us, or your responses to optional surveys conducted for research purposes.

Furthermore, we may record information about your website usage and retain telephone or video conference recordings if required to meet regulatory obligations.

4. Transfer of Personal Data

We will not transfer your personal data to any third party without your explicit consent.

5. How We Use Personal Data

Your personal data may be used for the following purposes:

- To manage and optimize the functionality and presentation of our website.
- To fulfill our obligations under any contracts we enter with you.
- To maintain open and effective communications with you.
- To satisfy legal and regulatory requirements, including disclosing data or recordings to regulatory bodies if necessary.
- For general business operations, including contract negotiation, administration, financial record-keeping, regulatory investigations, debt collection, and social responsibility initiatives.
- For employment-related processing and activities.

6. Legal Basis for Processing

We rely on the following legal bases to lawfully process your personal data:

- Your explicit consent.
- Fulfillment of contractual obligations.
- Our legitimate business interests.
- Compliance with legal obligations.

Our legitimate interests may include:

- Ensuring the functionality, accuracy, and relevance of our websites.
- Enhancing our products and services to support business growth.
- Providing secure IT infrastructure and services.
- Keeping stakeholders informed about our company and activities.
- Optimizing our hiring practices.
- Guiding our approach to social responsibility.

8. Disclosure of Your Information

Hallow Energy may share your personal information internally with personnel who require access for legitimate business or legal purposes. Additionally, we may disclose your personal data to external parties, which may include: (i) governmental and public authorities; (ii) regulatory bodies and courts; (iii) our professional advisors, including legal



counsel, auditors, and insurance providers; (iv) IT service vendors; and (v) third-party entities engaged by Hallow Energy for specific purposes, such as: (a) the provision of services requested by you; (b) the protection of intellectual property rights; (c) obtaining legal or professional advice; or (d) compliance with legal obligations or responding to lawful requests.

Furthermore, your personal information may be disclosed in the following circumstances:

- In the course of any merger, acquisition, or sale of business assets, your data may be shared with prospective counterparties.
- If Hallow Energy's assets are transferred to a third party, personal information held may be included in such a transfer.
- If required by applicable regulations, we may disclose your data to regulatory authorities.

In some instances, users of our Website may be permitted to submit comments, testimonials, or other content. If you voluntarily submit such content, please note that it may become publicly accessible and may be viewed, collected, and used by others.

9. Social Media

Our Website may contain links to social media platforms such as Facebook, video hosting services like Vimeo, or professional networking sites such as LinkedIn. When engaging with these links, your browser may establish a direct connection with the servers of the respective third-party platform. These platforms may collect data regarding your browsing activity and may associate it with your account, if you are logged in. For detailed information on how these third parties handle personal data, please refer to their individual privacy policies.

10. Records Retention

Personal data is retained only for the duration necessary to fulfill the purposes for which it was collected. Once no longer required, such data will be securely deleted or destroyed. The specific retention period will vary based on the nature and classification of the personal data involved.

11. Your Rights – Marketing and Third-Party Websites

Where you have provided explicit consent, Hallow Energy may contact you via email for marketing purposes. You have the right to object to the use of your personal data for such purposes at any time. Where legally required, we will notify you—prior to or at the time of data collection—if your information will be used for marketing or shared with third parties for similar purposes.

You may withdraw your consent or opt out of marketing communications by following the “unsubscribe” link included in our emails or by adjusting your communication preferences.



Please note that our Website may include links to external websites operated by our affiliates, partners, or other third parties. These websites maintain independent privacy policies, and we accept no responsibility or liability for their content or practices. We recommend reviewing those policies before submitting any personal information.

12. Your Rights – Access, Rectification, and Deletion

Under applicable data protection laws, you may exercise the following rights concerning your personal information:

- Request access to, or a machine-readable copy of, the personal data we hold about you.
- Request the correction or deletion of your personal data.
- Object to the processing of your personal data.
- Withdraw your consent at any time (without affecting the legality of prior processing based on that consent).

To exercise any of these rights, you may contact us using the details provided in this Notice.

13. Security

Hallow Energy has implemented appropriate technical and organizational safeguards designed to protect personal data against unauthorized access, alteration, disclosure, loss, or destruction, whether accidental or unlawful. While we endeavor to protect your personal data, please be aware that data transmission over the internet is inherently insecure. Accordingly, any transmission of data to us is undertaken at your own risk. We restrict access to your personal information to those employees, contractors, and authorized third parties who have a legitimate business need to know. These individuals are required to handle such information in accordance with our instructions and are bound by confidentiality obligations.

15. Use of Cookies

Hallow Energy does not utilize cookies directly. However, cookies may be deployed by our IT service providers to support the functioning of our Website. We do not exert direct control over these third-party cookies.