

FEED-X CHALLENGE: PRIVACY POLICY**1. Introduction**

1.1 The FEED-X Challenge is an environmental sustainability programme whose purpose is to source, test, finance and scale alternative feed ingredients into the global feed industry. Its objective is to significantly reduce feed related environmental impacts, by adopting alternative feed related ingredients and technologies in the aquaculture and terrestrial feed sector.

1.2 FEED-X is operated by Project X Global Limited ("**Project X**"), a company registered in England and Wales with registration number 10912488. We are committed to respecting your privacy and safeguarding personal data you share with us; in this policy we explain how we will handle your personal data.

The provision of your personal data to us is voluntary. However, without providing us with your personal data, your use of our services or your interaction with us may be limited. For example, you will be unable to apply to the FEED-X Challenge on behalf of your organisation.

2. How we use your personal data

2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

2.2 We may process your contact details ("**contact data**"). The contact data may include your name, email address, organisation, postal address, telephone number or other contact details. The source of the contact data is you or your employer. The contact data is processed for the purposes of providing our services and communicating with you, for example to respond to an enquiry you make or to register and administer your participation in our events. The legal basis for this processing is our legitimate interests, namely facilitating the connection of suppliers of innovative solutions with those organisations who may wish to use them.

2.3 We may process your personal data that are provided in the course of the use of our services ("**innovation data**"). The innovation data may include information relating to your innovations or solutions provided to us as part of the FEED-X Challenge. The innovation data is processed for the purposes of providing our services and communicating with you. The legal basis for this processing is our legitimate interests, namely facilitating the connection of suppliers of innovative solutions with those organisations who may wish to use them.

2.4 We may process information that you share with us for publication on our website or through our services ("**publication data**"). The publication data is processed for the purposes of enabling such publication. The legal basis for this processing is our legitimate interests, namely facilitating the connection of suppliers of innovative solutions with those organisations who may wish to use them.

2.5 We may process your personal data for the purposes of offering and marketing relevant products and/or services to you or providing you with other information about our work, services and products which we consider may be of interest to you ("**marketing data**"). Where we do so via email or SMS the legal basis for processing marketing data is consent

(unless applicable law allows us to do so without obtaining your consent). Where we do so by other means of communication, the legal basis for this processing is our legitimate interests, namely marketing our products and services. Any direct marketing communications made by Project X shall have an opt out option.

2.6 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data is processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

2.7 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data is processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely facilitating the connection of suppliers of innovative solutions with those organisations who may wish to use them.

2.8 We may process your personal data for the purposes of assessment or analysis ("**usage data**"). Usage data is processed for the assessment of your progress throughout the FEED-X programme.

2.9 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. Where this data is not special category data, the legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others. Project X will only process special category personal data where allowed to do so by the GDPR and cognisant that it understands its obligation to handle special category personal data more carefully.

2.10 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject (for example requirements relating to the payment of tax or anti-money laundering initiatives), or in order to protect our rights and interests, or your vital interests or the vital interests of another natural person (for example where an individual suffers a medical emergency on our premises or at one of our events).

3. Providing your personal data to others

3.1 We may disclose your personal data to our partners insofar as reasonably necessary for the purposes set out in this policy. Here is a link to a website that lists our roster of experts: <https://projectxglobal.com/our-roster-of-experts/>.

3.2 We may disclose your personal data to our professional advisers insofar as reasonably necessary for the purposes of obtaining professional advice and managing legal disputes.

3.3 We may disclose your personal data to our partners who are looking for sustainable innovation and solutions, and or sustainable investments, insofar as reasonably necessary for the proper delivery of our services.

3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person, or in order to protect the rights, property or safety of Project X, its personnel, users, visitors or others.

3.5 We may disclose elements of your profile data to other users of our Services where this is necessary in order to deliver the service effectively to you and other users.

3.6 In particular, we reserve the right to disclose your personal data to third parties (i) in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the (prospective) seller or buyer of such business or assets or (ii) if substantially all of our assets are acquired by a third party, personal data held by us may be one of the transferred assets.

3.7 Except as identified in this clause 3, we will not share your details with any 3rd parties without your prior consent.

4. Retaining and deleting personal data

4.1 This Section 4 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.3 In general, we will retain and securely delete your personal data using the following retention periods. However, there may be circumstances where applicable law allows us to keep your personal data for longer (because our purpose(s) for using it remain(s) valid), or where we must delete your personal data sooner because it is no longer required in connection with the relevant purpose(s) or because you validly exercise your right of erasure (see section 6 below):

- (a) Usage data will be retained for 1 year following its creation, at the end of which period it will be deleted from our systems.
- (b) Contact data will be retained for 2 years following its creation, at the end of which period it will be deleted from our systems.
- (c) Innovation data will be retained for 5 years following its creation, at the end of which period it will be deleted from our systems.
- (d) Publication data will be retained for 5 years following its creation, at the end of which period it be deleted from our systems.
- (e) Marketing data will be retained for 2 years following its creation, at the end of which period it will be deleted from our systems unless you indicate that you wish to continue receiving marketing communications from us.
- (f) Notification data will be retained until you cancel your notification subscriptions, at the end of which period it will be deleted from our systems.
- (g) Correspondence data will be retained for 5 years following its creation, at the end of which period it will be deleted from our systems

4.5 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect our interests, your vital interests or the vital interests of another natural person.

5. Amendments

5.1 We may update this policy from time to time by publishing a new version on our website.

5.2 Where reasonable for us to do so, we will notify you of changes to this policy by email. We will always issue an updated notice on our website when we update this policy. Where there are updates to the privacy policy, Project X shall inform individuals.

6. Your rights

6.1 In this Section 6, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights, which can be found here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

6.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.3 You have the right to ask us for confirmation of whether or not we process your personal data and, where we do, you have the right of access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing we are satisfied that you are entitled to see the personal data requested (for example the rights and freedoms of others are not unduly affected), we will supply to you a copy of your personal data.

6.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

6.5 In some circumstances you have the right to the erasure of your personal data. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain exceptions to the right to erasure. Those exceptions include where processing is necessary: for exercising the right of

freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

6.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data (meaning that we will restrict processing until we verify accuracy of the personal data); processing is unlawful but you do not ask us to erase your personal data; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

6.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

6.8 Where we rely on the lawful basis of consent to process your personal data, you have the right to withdraw that consent. In practice, this is primarily relevant to Marketing Data and Notification Data when you consent in advance to our use of your personal information for electronic direct marketing purposes, and we will provide you with an opportunity to opt out of the use of your personal information for electronic direct marketing purposes in each marketing communication we send. Please note that where you withdraw your consent, this does not affect the lawfulness of processing based on that consent before the withdrawal. You also have the right to object to our processing of your personal data for direct marketing purposes. You may instruct us at any time not to process your personal information for marketing purposes, and can do so by email at feedxchallenge@projectxglobal.com.

6.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

6.10 To the extent that the legal basis for our processing of your personal data is consent, or we process your personal data in order to perform a contract with you or take steps at your request prior to entering a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

6.11 If you consider that our processing of your personal information infringes data protection laws, or you have any concerns about our processing of your personal data, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of

work or the place of the alleged infringement. In the UK, the supervisory authority is the Information Commissioner's Office: (<https://ico.org.uk>).

6.12 You may exercise any of your rights in relation to your personal data by contacting us using the details in section 7 below

7. Our details

7.1 We are registered in England and Wales under registration number 10912488 and our registered office is at Bates Wells LLP 10 Queen Street Place London EC4R 1BE.

7.2 You can contact us:

(a) by post, using the postal address of our principal place of business; 17 Hanover Square, Mayfair, London W1S 1BN

(d) by email, using the email address feedxchallenge@projectxglobal.com.

8. International data transfers

8.1 Because we share personal data with other organisations and may use agencies and/or suppliers to process personal data on our behalf, it is possible that personal data may be transferred to and/or stored in a location outside the UK and the European Economic Area ("EEA"), for example the United States.

8.2 Please note that some countries outside of the UK and the EEA have a lower standard of protection for personal data, including lower security requirements and fewer rights for individuals. Where your personal information is transferred, stored and/or otherwise processed outside the UK and the EEA in a country that does not offer an equivalent standard of protection to the UK and the EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information (such by entering into standard contractual clauses approved by the European Commission).

8.3 Unfortunately, no transmission of your personal data over the internet can be guaranteed to be 100% secure – however, once we have received your personal information, we will use strict procedures and security features to try and prevent unauthorised access.