

Euclid Ventures, Ltd.
Privacy Policy and Cookie Statement

Last Updated: [24/06/2025]

Note for Residents of the European Economic Area, Switzerland, and the United Kingdom.
Please see Section XI below for specific details on your rights under applicable law.

I. Introduction

This Privacy Policy and Cookie Statement (“Privacy Policy”) describes how we process your Personal Information.

By using the Service, you acknowledge your understanding of this Privacy Policy. If you do not agree with the contents of this Privacy Policy, you should not use the Service.

This Privacy Policy may be modified at any time without prior notice to you. Your continued use of the Service will constitute your acceptance of any changes or revisions to this Privacy Policy.

II. Definitions of Terms Used in this Policy

“Device” means any computer, tablet, mobile phone, or any other device capable of accessing the Service.

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, Device, or household. Anonymous, de-identified, or aggregate information is not Personal Information.

“Service” means the _gamma Protocol and all related services, including any website, mobile site, application, other activity, or offering provided by us.

“Third-Party Business” means any third party unaffiliated with us to whom we disclose Personal Information for their own purposes.

“We,” “Us,” “Our” and “_gamma,” whether capitalized or not, means Euclid Ventures, Ltd. and its affiliates and subsidiaries

“You” or “Your,” whether capitalized or not, means all those who access, visit and/or use the Service.

III. Categories of Your Personal Information that We May Acquire

We may collect, obtain or otherwise acquire the following types of Personal Information about you, and we may make and retain inferences drawn from such information:

1. Identifiers, such as your unique online identifier or IP address.
2. Internet or other electronic network activity information, such as website or app activity data.
3. Geolocation data, such as the physical location of your Device.

IV. How We Acquire Your Personal Information

Personal Information You Provide. We will never ask for it, but you may receive Personal Information if you directly provide it to us.

Personal Information Automatically Collected. We may automatically collect certain information, some of which may be deemed Personal Information. The information collected may include information about your Device and geographic location of you and/or your Device, as well as date/time stamp, IP address, time of visits, the site(s), application(s), destination(s), and/or service(s) you arrived from, and other clickstream data.

Personal Information Acquired from Third Parties. We may acquire your Personal Information from third parties. For example, we may purchase or otherwise acquire Personal Information from third party consumer data suppliers/resellers, data aggregators, advertising networks, data analytics providers, internet service providers, operating systems and platforms, data brokers, business contact databases, government entities, and our parent, subsidiaries, affiliates and other related entities.

V. How We Use Your Personal Information

Processing Your Requests. We use your Personal Information to facilitate your use of the Service.

Administering the Service. We also use and share your Personal Information for any lawful purpose in connection with administering the Service.

VII. Sharing of Your Personal Information with Third Parties.

Third Parties with Whom We May Share Your Personal Information. We may disclose your Personal Information to the following categories of third parties:

- Service Providers
- Affiliates
- Governmental and law enforcement officials
- Persons involved in an acquisition of our business or assets

Service Providers. We may share your Personal Information with Service Providers that perform services for us, but only for the purpose of and to the extent necessary to perform those services.

Affiliates. We may share your Personal Information with our parent, subsidiaries, affiliates and other related entities, and our advisors, including lawyers, consultants, accountants, and others, for all purposes described in this Section VII.

Marketing Communications. We may use your Personal Information to communicate with you about new features offered by us and Third-Party Businesses, including our advertising, marketing and sponsorship clients.

Health, Safety, and Legal Requests. We may share your Personal Information for purposes of health, safety and other matters in the public interest. We may also share your Personal Information to cooperate with official investigations or legal proceedings brought by or otherwise involving governmental and/or law enforcement officials, as well as private parties, including, for example, in response to subpoenas, search warrants, court orders, or other legal process. We may also use Personal Information to protect our rights and property and those of our agents, customers, and others including to enforce our agreements, policies, and terms of use.

Transfer or Sale of Our Business. If we are involved in a business transaction, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving us, we may share your Personal Information in connection with such transaction. We may also share your Personal Information to legal, financial, insurance, or other advisors in connection with such business transaction or management of all or part of our business or operations.

VIII. Cookies and Related Technologies

We may place and/or store code or other types of information and/or software on your Device or within your browser, such as cookies, locally shared objects, and HTML5 (collectively, “Local Device Storage”). We and Third-Party Businesses may independently or in conjunction use Local Device Storage in connection with the Service in a way that collects Personal Information for the purposes described in the respective privacy policies. Your Device or browser may include an option that allows you to disable Local Device Storage.

About Cookies. Cookies are small text files that websites save locally to your computer, which allow sites to store and use information during your visit. They can improve your experience when using a website by:

- Remembering preferences, so you don’t have to keep re-entering your choices when you visit again
- Measuring how you use a site, so that changes can be made to ensure it meets your needs

Our Use of Cookies. We use the following cookies:

- Analytical cookies to track anonymous usage statistics and do not collect any personal information that can be used to identify you. This helps us analyze data about webpage usage and improve our website in order to tailor it to customer needs. The analytical cookies we use store information about what pages you visit, how long you are on the site, how you arrived at the site, and what you click on. We do not allow cookie providers to use or share our analytics data.
- Session cookies to remember selections and preferences that you have already made or information that you've already given.

Managing Cookies. You can manage the cookies stored on your computer, or turn them off completely, through your browser settings. All modern browsers will let you change your cookie settings to give you broad control over whether cookies can be set or not. For more information, visit the help section for the browser you use.

IX. Transfer of Your Personal Information Among Jurisdictions

Your Personal Information may be processed, transferred to, and maintained on, servers and databases located outside of the jurisdiction in which you are based and where the privacy laws may not be as protective as your jurisdiction. We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

X. Protection of Your Personal Information

Security Measures. We take reasonable security measures to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of, Personal Information.

No Liability for Breach. Because no security system is impenetrable, we cannot guarantee the security of your Personal Information. By using the Service, you agree to assume all risk in connection with your Personal Information. We are not responsible for any loss of such Personal Information or the consequences thereof.

Breach Notification. If we believe the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you subject to applicable laws and regulations governing such notifications.

XI. Notice to Residents of the European Economic Area (“EEA”), Switzerland and the UK

Purposes of Processing

We process your Personal Information to process your requests, to administer the Service, facilitate access by Service Providers and Third-Party Businesses, make marketing communications, facilitate health, safety and legal requests, transfer or sell our business, and to combine data sets.

Legal Basis for Processing

We rely on the legitimate interest basis of processing for the other activities described above because processing Personal Information is necessary to provide you with the Service and to respond to your requests, our activities are reasonably expected by our customers, and those activities do not unduly and negatively affect the privacy rights of our customers. We may also process your Personal Information to comply with legal obligations to which we are subject and cooperate with regulators and enforcement bodies.

Transfers

Your Personal Information may be processed in or transferred to the U.S. or elsewhere in the world. We will ensure that transfers of Personal Information to a third country or an international organization are subject to appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact the Data Protection Officer by email at [privacy@gma.fi] or as described at the end of this section.

Erasure and Restriction of Personal Data

Unless otherwise provided for in this data protection declaration for individual cases, your Personal Information may be erased if this data is no longer necessary for the purposes for which it was collected or was in any other way processed and if there are no legal obligations that require us to keep it. We will also erase your Personal Information processed by us upon request, in accordance with Art. 17 GDPR, if the conditions described therein are met. If your Personal Information is required for other legally permissible purposes, the data will not be erased, but its processing will be restricted in accordance with Art. 18 GDPR. In the event of a restriction, the data will not be processed for other purposes. This applies, for example, to Personal Information that we must keep for commercial or tax reasons.

Individual Rights

If you are a resident of the EEA, Switzerland or the United Kingdom, you are entitled to the following rights. Please contact our Data Protection Officer to exercise these rights by email at [privacy@gma.fi] or as described at the end of this section. In order to verify your identity, we may require you to provide us with Personal Information prior to accessing any records about you.

- *Right to access and rectify your Personal Information.* You have the right to obtain information about our processing of your Personal Information and a copy of your

Personal Information that we store. You have the right to request that we update your Personal Information if it is inaccurate or incomplete.

- *Right to request erasure of your Personal Information.* You have the right to have your Personal Information erased from our systems if the Personal Information is no longer necessary for the purpose for which it was collected or you withdraw consent and no other legal basis for processing exists.
- *Right to restrict our processing of your Personal Information.* You have the right to restrict our processing if you contest the accuracy of the Personal Information we store about you, our processing is deemed unlawful and you oppose erasure of your Personal Information, or we no longer need the Personal Information for the purposes for which we collected it but we must store it to comply with our legal obligations.
- *Right to portability of your Personal Information.* You have the right to receive your Personal Information and to transmit it to another controller where our processing is based on consent you gave us and was carried out by automated means.
- *Right to object to our processing of your Personal Information.* You have the right to object to our processing where we process Personal Information based on legitimate interest.
- *Right to lodge a complaint.* You have the right to lodge a complaint about our collection and processing of your Personal Information to your Data Protection Authority. Contact details for Data Protection Authorities are available at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.
- *Data Protection Officer.* If you are a Data Protection Authority in the EEA or UK with questions about this Privacy Policy or the Service, please contact us directly by contacting our Data Protection Officer by email at [\[privacy@gma.fi\]](mailto:privacy@gma.fi). Alternatively, you can contact our Data Protection Officer at the following address:

Data Protection Officer
[\[privacy@gma.fi\]](mailto:privacy@gma.fi)

XII. Privacy Policy Coordinator

If you have any concerns or questions about any aspect of this Privacy Policy, please feel free to contact our Privacy Policy Coordinator by email or as follows:

Privacy Policy Coordinator
[\[privacy@gma.fi\]](mailto:privacy@gma.fi)

Please include your name, contact information, and the specific website, mobile site, application, and/or other service in your request.

Only inquiries about this Privacy Policy or your Personal Information should be sent to the Privacy Policy Coordinator. No other communications will be accepted or responded to.