

PRIVACY POLICY

Welcome to <https://ecvholdings.com/> (“Website”), which is owned and operated by ECV Holdings, LLC. (“ECV,” “Energy Capital Vietnam,” “us,” or “we”). We respect your privacy and have developed this Privacy Policy that describes the types of information we may collect from you or that you may provide when you visit this Website otherwise interact with us) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

The rights discussed in certain sections of this Privacy Policy may be subject to exemptions or other limitations under applicable law.

If you are located in the European Economic Area (“EEA”) or the United Kingdom (“UK”) and subject to the EU GDPR or the UK GDPR as it forms part of the laws of the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy, and Electronic Communications (Amendments, etc.) (EU Exit) Regulations 2019 (the “UK GDPR,” and, together with the EU GDPR, the “GDPR”), please also review the below section, **Additional Information for EEA and UK Data Subjects**, for a description of your rights and other information related to the GDPR.

Information We Collect & How We Collect It

In general, we collect information, including personal information, when you communicate with us and when you use the website. When we use the term “personal information,” we mean any information about an individual from which that person can be identified. We may collect personal information when you provide it to us directly, and we may also collect some information automatically or from other sources.

Depending on how you interact with us, we may collect several types of information from and about users of our website, including:

- Your name and contact information, such as your email address.
- Online identifiers such as your IP address.
- Correspondence and communications such as information in comments or questions you send to us.

We collect this information:

- Directly from you when you provide it to us (e.g., by filling in forms on our Website); and
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies. For more information, please review **Our Website’s Use of Cookies and Similar Technologies** below.

- Through sources such as service providers and other third-party services.

Why We Process Your Information

We use information that we collect about you or that you provide to us, including any personal information, for various purposes, including to:

- Provide you with information, products, or services that you request from us.
- Present, manage, and operate our website and its contents to you.
- For any other purpose for which you provide it or disclosed by us when you provide the information.
- For any other purpose with your consent.
- Respond to any questions or comments you send to us or where you report a problem with the Website.
- Comply with our legal or regulatory obligations.
- Detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity.
- Where permitted by applicable law, providing you with marketing or promotional materials.
- Internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

Disclosure of Your Information

We may disclose aggregated information about our users and information that does not identify any individual. Additionally, we may disclose personal information that we collect or you provide as described in this privacy policy to our affiliates, service providers, successor (in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of all of ECV's assets), to fulfill the purpose for which you provide it, for any other purpose disclosed by us when you provide the information, with your consent, to comply with applicable laws, regulations, or a court order; or to protect the rights, property or safety of ECV, its customers, or others.

How Long We Keep Your Information

We will store your personal information only for as long as necessary for the purposes of providing access to our website and related services to you, as required by law, and for the exercise or defense of legal claims.

Where We Process Your Information

We are based in the United States and Vietnam. When you provide personal information to us from outside of the U.S., please be aware that we will receive and process it in the U.S. and that data protection laws may be different from those of your country of residence. We may transfer the personal information we collect to other countries where we do business, which may not have the same data protection laws as the country in which you originally provided the data. To the

extent required by applicable law, when we transfer your personal information to recipients in other countries, we will take measures to protect that information.

Your Rights and Choices

We strive to provide you with choices regarding the personal information you provide to us. Under applicable law, you have certain rights relating to our collection and use of your personal information, including rights to:

- **Opt-Out of Receiving Our Marketing Emails.** To stop receiving our promotional emails, follow the opt-out link in any of our promotional emails or email us at info@ecvholdings.com. This opt-out does not apply to transactional or informational emails (e.g., our communication in response to your request for information, products, or services from us) nor to disclosure to a third party that is acting on our behalf and under our instructions in support of our permitted uses of your personal information.
- **Access and Correct Your Information.** You can request to access the personal information that we hold about you and to correct any information that is incomplete or wrong. You can make such requests by contacting us using the information in **Contact Us** below. Please note that we may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.
- **Make Choices Concerning Cookies.** You can control cookies by using the tools described below in the **Cookies** section.

Security

We maintain appropriate technical and organizational measures designed to protect your personal information against loss or accidental, unlawful or unauthorized, alteration, access, disclosure or use. Unfortunately, no data transmission or storage system can be guaranteed 100% secure.

Children's Information

Our website is not intended to attract children, and we do not knowingly collect any personal information about anyone under the age of 13. If you believe your child is using our website, please contact us using the information provided in **Contact Us below** so that we can investigate and delete any personal information as may be appropriate.

Links to Other Websites

The website may contain links to information at other third-party websites. When you click on one of these links, you are moving to another website. We encourage you to read the privacy statements of these linked sites as their privacy policies may differ from ours.

Additional Information for EEA and UK Data Subjects

If you are an EEA or UK data subject and the processing of your personal information is subject to the GDPR, please review this section in addition to the entire Privacy Policy. For purposes of the GDPR, we are a “controller.”

Legal Basis

As described above in **Information We Collect and How We Collect It and Why We Process Your Information**, we process personal information for various purposes. Our lawful bases for processing such personal information include:

- Where it is necessary for our legitimate interests in connection with our investment advisory business (or those of a third party), and your interests and fundamental rights do not override those interests.
- To comply with certain legal and regulatory requirements.
- Depending on the circumstances, we may need to process your personal information for the performance of a contract to which you are a party or related pre-contractual steps.
- With your consent, as required by the GDPR.

Please note that you have a right to object to the processing of your personal information where we are carrying on that processing for our legitimate interest.

Your Rights

Depending on applicable law, you may have certain rights with regard to your personal information, including:

- Request access to your personal information.
- Correct personal information that we hold where it is incomplete or inaccurate.
- Restrict the processing of your personal information in certain circumstances.
- Object (including by automated means) to the processing of your personal information in certain circumstances, including: (i) where we process personal information for direct marketing purposes (or profiling purposes, to the extent that the profiling is related to direct marketing); or (ii) where we have processed such data on the basis of our legitimate interests.
- Request that we erase your personal information (subject to certain exceptions).
- Ask for a copy of your personal information to be provided to you, or to a third party, in a digital form.
- Withdraw your consent to the processing of your personal information (where we are relying on consent to process your personal information); however, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- Lodge a complaint with your local data protection authority.

If you wish to exercise any of these rights, please contact us using the information below in **Contact Us**. Please use the subject line “Data Subject Rights Request.”

Transfers of Information Outside of the EEA or UK

In providing our services, we may sometimes transfer and store information outside the EEA or the UK, including to the United States. Where we transfer personal information outside the EEA or UK, we will seek to ensure a similar degree of protection is afforded to it by ensuring that personal information is only transferred:

- To countries that have been deemed to provide an adequate level of protection for personal information by the European Commission or Information Commissioner’s Office (the “ICO”) (an “**adequacy decision**”).
- To persons and undertakings to whom the transfer of such personal information is made pursuant to a contract that is compliant with the model contracts for the transfer of personal information to third countries from time to time approved by the European Commission or ICO.
- To persons and undertakings outside of the EEA or UK pursuant to other appropriate safeguards for the transfer of personal information.
- Only on one of the conditions allowed under the GDPR in the absence of (i) an adequacy decision or (ii) appropriate safeguards, such as a contract that is compliant with the model contracts for the transfer of personal information to third countries approved by the European Commission or ICO.

You can contact us through the information provided in **Contact Us** below for further information on specific mechanisms we utilize for transferring personal information outside the EEA or the UK and the countries to which such transfers may be made.

Our Website’s Use of Cookies and Similar Technologies

When you visit our website, we may, and our service providers may use cookies or similar tools (collectively “Automatic Data Collection Tools”). In addition, some of our service providers may collect information about your online activities over time and across third-party websites using Automatic Data Collection Tools. Cookies are small pieces of information that allow them to maintain your connection to the website. This Website may use cookies for detecting what kind of device you have in order to present content in the best way, for a language switch, and/or for other purposes. This Website may also use analytics or other sharing tools, as described below. You can refuse the use of cookies and change your cookie preferences through our cookie management system/cookie banner or by changing the setting on your web browser to delete or reject cookies. If you delete or reject cookies, some portions of our website may not function properly.

Google Analytics

This Website uses Google Analytics, a web analytics service provided by Google, Inc. (‘Google’). For more information on (a) how Google collects and processes such information, please click [here](#), and (b) how to prevent the use of Google relating to your use of our website by downloading and installing a browser plug-in, please click [here](#).

Sharing Tools

This website uses sharing tools. Sharing tools allow you to share content through social networks such as Facebook or Twitter. When you use one of these buttons, the social networking site may place a cookie on your computer. This would be a third-party cookie set by the social networking site. If you have any questions about the use of these third-party cookies, you should check the relevant social networking site's cookie policy.

Do Not Track

Your browser and other mechanisms may permit you to send do-not-track signals or other similar signals to express your preferences regarding online tracking. We do not currently respond to such signals.

Contact Us

If you have any questions about this Privacy Policy or our practices, please contact us at info@ecvholdings.com.

Changes

This Privacy Policy may change from time to time. We will post any privacy policy changes on this page. This privacy notice was last updated on June 19, 2023.