

DATA PRIVACY POLICY

This document sets out the PRIVACY and COOKIES Policies (the “Policy”) of CLOUDSWEEP (CLOUDSWEEP SOLUÇÕES DE CLOUD INTELIGENTES LDA), a company incorporated and existing according to the laws of Portugal, VAT 518969401, with headquarters located at Rua dos Lirios 54, 2820-561 Charneca da Caparica, its successors and permitted assigns as well as its subsidiaries and affiliated group companies (“CLOUDSWEEP”) applying in connection with CLOUDSWEEP’s Products and Services (the “Offerings”), access and use of CLOUDSWEEP Website at <https://cloudsweep.ai>, or Cloudsweep application (EU <https://eu1.app.cloudsweep.ai>, US <https://us1.app.cloudsweep.ai>) (the “Website”) whenever someone (“USER”) transmits by any possible means to CLOUDSWEEP any personal data of his/her own or that of identified or identifiable individuals other than USER (the “Data”).

The “Offerings” and the “Website” are hereinafter indistinctively referred to as the “SITES”.

If USER has reservations, doubts, or objections to this Policy, USER should resume and exit from the SITES, refraining from disclosing, showing, transmitting, sharing, making any Data available in the SITES or in connection therewith, including the upload of Data – whether totally or in part - onto any Offerings or the Website.

CLOUDSWEEP reserves the right to change this Policy at any time without prior notice. Any amended Policy will be integrated herein from time to time. Acceptance of Terms and Conditions of Service with CLOUDSWEEP, continued use of its Offerings, registration at the SITES, and their use along with enrolling and participating in the SITES, imply that the USER is aware, acknowledges, and accepts this Policy as amended and in force from time to time.

Last revised and applicable as from October 30, 2025.

What and how Data is collected?

The USER may visit the public Website anonymously at all times, provided, however, that the Website uses Cookies. Please check out the CLOUDSWEEP’s Cookies Policy <https://cloudsweep.ai/terms>

CLOUDSWEEP SITES are not suitable or intended for individuals under 16 (sixteen) years of age.

Registration and enrollment of an USER is normally processed online and further verified and validated offline, notably to the effects of processing any request forms of Offerings by CLOUDSWEEP, for invoicing, product monitoring, development and support, custom relationship management routines, sending of electronic messaging or inclusion of USER in a client database, depending on whichever’s the case.

Certain Offerings are ruled by specific terms and conditions. For further information on the specific applicable terms and conditions applying to the USER in every circumstance, the USER should contact CLOUDSWEEP.

CLOUDSWEEP WILL ONLY COLLECT DATA THAT IS VOLUNTARILY DISCLOSED AND SUBMITTED TO CLOUDSWEEP AND THAT CLOUDSWEEP IS LEGITIMATELY ENTITLED TO COLLECT AND PROCESS PURSUANT TO THE LAWS IN FORCE FROM TIME TO TIME, THE TERMS AND CONDITIONS OF SERVICE APPLYING TO CORRESPONDING OFFERINGS, AND THIS POLICY.

USER IS FREE NOT TO CONSENT TO CERTAIN DATA PROCESSING ACTIONS BY CLOUDSWEEP OR BY ANY OTHER ENTITY AND MAY WITHDRAW A PREVIOUSLY GRANTED CONSENT AT ANY TIME AT HIS/HER SOLE AND FAIR JUDGEMENT AND CRITERIA.

Refusal to grant consent or the withdrawal of a previously granted consent may only prevent CLOUDSWEEP from PERFORMING certain activities or tasks in respect of the Offerings, in which case, CLOUDSWEEP will so inform by adequate means to choose at its option and criteria. In case of a previously registered online USER, such will imply that the user is deleted from the CLOUDSWEEP databases.

If CLOUDSWEEP is limited to provide certain Offerings or to comply with its contractual obligations to USER due to USER's refusal or withdrawal of a consent to Data processing, then USER may resource to the alternate channels if/as available and CLOUDSWEEP shall to the maximum extent be excused from such contractual compliance to USER.

Is all data the same as Data?

No. CLOUDSWEEP may also collect and process corporate and business data from its clients, suppliers, partners, etc ("Corporate Data") such Corporate Data not being covered by the stipulations of this Policy in its entirety.

CLOUDSWEEP's corporate Clients, partners, suppliers and distributors expressly grant to CLOUDSWEEP a fully paid, royalty free, non-exclusive, sub-licensable, perpetual, worldwide license for CLOUDSWEEP to collect and process Corporate Data in question for the intended business purposes of CLOUDSWEEP including those relating to the providing of Offerings , monitoring of client's activity and processing of their feedback, promotional and marketing activities, sales management, quality control and continued improvement of products and services, amongst others that may be lawfully associated to CLOUDSWEEP's business activity.

Unless otherwise is imposed by Law, whenever any of such entities contact CLOUDSWEEP compelling it to disclose Data or Confidential Information of USER or Corporate Data (1) CLOUDSWEEP shall promptly communicate such compelled disclosure; (2) shall seek that the authorities in question contact directly the Data owner and to such effect shall only provide them with basic points of contact with him/her, as available to CLOUDSWEEP; (3) CLOUDSWEEP shall reasonably effort not to grant access to excessive information considering the one that was compelled from CLOUDSWEEP to be disclosed; (4) CLOUDSWEEP shall effort – to the far extent lawfully permitted and without additional costs – to prevent any entities to access directly to stored Data, encryption keys used to secure or the confer the ability to break such encryption. CLOUDSWEEP will not disclose Administrator Data outside CLOUDSWEEP or its controlled subsidiaries.

What are and how do cookies work? Cookies Policy

Cookies are alphanumeric identifiers that CLOUDSWEEP may transfer into the USER's device (computer's hard drive, for instance) to enable CLOUDSWEEP' systems to recognize USER's browser and tell CLOUDSWEEP how and when the Website is being visited and by how many people, also permitting to enhance USER experience (UX) ("Cookies").

Cookies may keep track of USER's movements within the Website, help them to navigate or advise navigation, remember navigation history, theme selection, preferences and other customization functions (if/as available).

Certain CLOUDSWEEP' partners may also use cookies on CLOUDSWEEP's Website without any control on the part of CLOUDSWEEP in what concerns their cookies or privacy policies (if any). Furthermore, certain Cookies enable interconnection and Data flows with social media such as **LinkedIn, Facebook, Instagram or X** (without limiting), **which may use cookies, web beacons and other storage tools, so as to collect and receive data from websites and other internet environments and eventually use such information for service measurement, marketing campaigns (including digital marketing) or personalized publicity.**

By default, the Websites use the following Cookies:

- ✓ Google Analytics® (i.e., _ga, _gid) which is an analytics tool from Google ® that interprets level of engagement and usage by USER of the Website and its functionalities.
- ✓ Social Media Pixels (Facebook, Instagram, X, LinkedIn and YouTube)
- ✓ _cloudsweep_session session cookie essential for the application to function when in logged in mode
- ✓ Preferences cookie for the application to remember user settings and choices

Cookies should not enable the collection of Data however such may be inferred from navigation and usage data.

CLOUDSWEEP recommends that USER leaves the Cookies activated because Cookies allow CLOUDSWEEP to make a better use of Website's functionalities. However, where the USER does not wish to accept Cookies, USER may configure the equipment so that USER is warned every time a Cookie is deposited on its drive and may deactivate all Cookies through the navigation tool (v.g. Google Chrome, Mozilla Firefox, Internet Explorer).

USER may also choose to refuse, delete or accept Cookies through an appropriate selection of functions in the "options" or "preferences" sections of the web browser. USER should further navigate the "Help" menu of the web browser to properly understand and configure its Cookies preferences.

CLOUDSWEEP' Website permits USERS to directly manage their preferences and to accept/refuse certain Cookies that may not be indispensable to the adequate functioning of the Website.

By using the Website the USER consents to his/her Data processing by CLOUDSWEEP and its partners according to his/her Cookies Preferences.

In case USER intends to disable tracking of navigation history on the internet please disable Google Analytics at <http://www.google.com>; however, please note that by doing this USER may not be able to use the full functionality of the Websites.

Total refusal of Cookies or their entire removal may cause the Website not to proper function or block certain functionalities, disabling them.

CLOUDSWEEP advises USERS to try and understand the implications of each and every Cookies used and to manage their preferences in a clear manner.

USERS may manage and prevent Cookies monitoring as stated above.

In order to further understand what Cookies are all about, understand what Cookies were installed and how they can be managed and/or deleted by USER please visit www.allaboutcookies.org.

Anonymous Information. How does it work?

CLOUDSWEEP may share generic aggregated demographic information not linked to any personally identifiable information for the purposes outlined above.

Non-personal identification information may include the browser name, device name, type of computer, and technical information about USER, means of connection to the SITES, such as the OS and/or the ISP utilized by USER or other similar non-personal technical information.

Whenever CLOUDSWEEP shares such information it shares it in a distinctive database so that information remains anonymous at all material times and cannot be reverted to be understood and processed as Data.

What are CLOUDSWEEP' purposes for Data processing?

CLOUDSWEEP may collect, store, process, and manage Data for the following purposes:

- ✓ Operations – Products Management, Products Order Processing and Management, Client Relationship Management, Complaints Management
- ✓ For the product to function, including information automatically obtained from the user's connected systems, including code repositories, cloud billing data and telemetry.
- ✓ Technical and of Technical improvement - To enable CLOUDSWEEP and its partners and subcontractors to collect feedback in respect of Products as well as to operate and maintain the Website and to technically support it;
- ✓ Marketing and Commercial – To send alerts on products, campaigns, promotions, news, special offers that may be interesting for the USER and PROVIDED THAT he/she has consented;
- ✓ Usability – To help USER to find the Offerings that best adapt and respond to his/her needs;
- ✓ To make the Websites more relevant and easier to navigate by USER and/or to help USER solve any navigation problems the user may find whilst using the Websites;

- ✓ Newsletters and generic information - To send periodic emails If USER decides to register and/or join CLOUDSWEEP's newsletters or non-solicited mailing (if/as available) and provided however that USER has so provided his/her consent.

If the user wishes to unsubscribe from future emails, pushups, or news from CLOUDSWEEP, he/she may

- ✓ Go to his/her preferences on the Profile Settings and follow the instructions therein for unsolicited messaging.
However please note that despite such fact, as a registered USER, you may continue to receive e-mails from the System (v.g. referring to passwords) and all legal notices (v.g. updates, new versions or terms and conditions);
- ✓ Contact CLOUDSWEEP support@cloudsweep.ai

How CLOUDSWEEP protects my Data?

CLOUDSWEEP shall process Data only in accordance to this Policy and the European Laws in force – as amended from time to time- within the European Union.

CLOUDSWEEP adopted appropriate technical and organizational measures intended to protect Data against accidental loss, destruction, or alteration; unauthorized disclosure or access; or unlawful destruction.

Sensitive data exchange between the Website and USER is most unlikely to occur. However, when/if such becomes the case, CLOUDSWEEP encrypts data in transit and at rest, including backups, and ensures that any processing of such data is performed in accordance with industry-standard security controls and least-privilege principles.

NOTWITHSTANDING THE LATTER PLEASE BE ADVISED THAT CLOUDSWEEP CANNOT ENSURE FULL NETWORK SECURITY OVER THE WEB AND USE OF THE WEBSITES MAY EXPOSE USER AND DATA TO RISKS SUCH AS IDENTITY THEFT, FRAUD OR FRAUDULENT ACTION BY THIRD PARTIES OUT OF CLOUDSWEEP'S CONTROL THAT MAY CAUSE USER IRREPARABLE LOSS AND/OR DAMAGE OF UNQUANTIFIABLE IMPACT.

USER DISCRETION ON THE USE OF THE INTERNET, THE WEBSITES AND THE DISCLOSURE OF USER DATA ALONG WITH ANY CONSENTS IN RESPECT THEREOF ARE STRONGLY ADVISED.

To whom may CLOUDSWEEP disclose my Data?

CLOUDSWEEP is not in the Data selling, trading, or renting businesses and therefore CLOUDSWEEP exchanging or sharing Data with third parties is strictly limited and is only made in accordance to the applicable laws subject however to the following:

- ✓ CLOUDSWEEP may share Data within companies part of CLOUDSWEEP Group for their activity's intended purposes and for the integrated supply of Products. Sharing of information shall be in the ambit of intra-group agreements as relevant to the businesses and for the correct implementation of the internal processes throughout the

business value chain.

- ✓ CLOUDSWEEP may share Data with business partners and other companies of CLOUDSWEEP Group in the scope of existing partnerships and CLOUDSWEEP's activity.
- ✓ Administrator data for purposes of Website security and/or for the active fraud and attack prevention.
- ✓ Data storage operations being contractually guaranteed before third party providers the compliance with the terms and conditions of the herein Policy.
- ✓ As far as the Website is concerned, CLOUDSWEEP may source from third party providers the support of certain activities of website and subsite (landing pages) building and management, as well as their administration and updating. Any Data shared with such third parties shall be STRICTLY AS NEEDED for the purposes of rightful rendering of such support Products by the third-party providers in question.

Any and all disclosure of Data (if any) shall be SOLELY in strict conformity with the Offerings being provided by CLOUDSWEEP, the consents provided by USERS (if/when applicable) and any other legitimacy as provided by Law and in conformity to this Policy.

CLOUDSWEEP shall not knowingly disclose Data or confidential information of EU citizens into non-EU territories or to companies that do not confer to CLOUDSWEEP similar levels of security and protection of Data as that currently required from companies and players within the EU. The latter does not apply (1) if USER so requires, consents or determines CLOUDSWEEP; (2) as deriving from interaction of USERS with social media and/or their online activity, which by nature are multi-territorial; (3) as provided for in Law or as imposed by a court or administrative order or another public determination by an entity or officer with jurisdiction over the CLOUDSWEEP outside the EU; (4) where an agreement with transmittee has secured similar levels of security and protection of Data as that currently required from companies and players within the EU, in terms consistent with those published revised and in force from time to time by the European Commission.

Where does CLOUDSWEEP process my Data?

Except as described elsewhere herein, Data may be processed only within the European Union only. Please find below the sites where our systems are located:

- Europe: AWS region eu-west-1
- US: AWS region us-east-1

CLOUDSWEEP abides by the European Union Data Privacy laws regarding the collection, storage, processing, management and retention of Data from European Union national or citizens which data is processed within the European Union.

Who is the Data Processor?

CLOUDSWEEP (as above detailed) is the Data Processor of Data belonging to the USER (the

“Data Controller”).

The contact of CLOUDSWEEP’s office in charge of data protection matters is:

Cloudsweep HQ, Portugal

support@cloudsweep.ai

What are my Rights?

USER has the right to access, rectify and/or eliminate (totally or partially) its Data, the right to be informed on the processing activities, the right to oppose or limit the processing activities, portability right (in certain cases) and any others as conferred by Law as in force from time to time.

The USER is entitled to claim or complaint directly before the Data Protection supervising or regulatory authority in Portugal, which is the CNPD- *Comissão Nacional de Proteção de Dados*, the contacts of which shall be provided by CLOUDSWEEP upon request.

CLOUDSWEEP shall respond to any requests by USERS pursuant to the herein terms and the provisions of the Law.

For how long is my Data stored and processed?

CLOUDSWEEP retains USER Data until the longest of:

- (i) For as long as the USER is registered at the Website (where there’s no business relationship between such user - whether individually or as a representative of CLOUDSWEEP’s client in connection with Offerings);
- (ii) The term necessary for the fulfillment of a contractual/ pre-contractual obligation, the fulfillment of a legal obligation or the legitimate pursue of a business interest of CLOUDSWEEP;
- (iii) For as long as USER consents Data processing for a specific purpose and whenever the consent is the legitimate cause for Data processing (v.g. marketing and unsolicited mailing purposes).

How is my Data deleted?

Data is deleted through safe deletion procedures described in internal business processes approved and in force at the CLOUDSWEEP.

Digital Data may be anonymised whenever the removal or deletion of such Data from our systems may not reconcile on a reasonable basis with the data quality of the database in which they are located; notably, whenever the deletion or removal may imply a considerable risk of data breach to other data stored on same systems or part of same database and the latter are to remain integrate and active (impacts on data integrity and/or on systemic data quality feasible or anticipated).

Data in physical media shall be eliminated by irreversible destruction methods.

Deletion in social media or the Internet is not ensured by CLOUDSWEEP as LANDING-JOBS lacks the means, resources and the control to do so.

What Laws and Jurisdiction applies?

Data will be processed solely according to this Policy and the Laws in force. No further laws shall apply to Data.

Any disputes hereunder shall be submitted and resolved exclusively by the Portuguese Courts, whose territorial and material jurisdiction will be determined according to the procedural laws in force.

Last Revised and in force as of [●]