

PERSONAL DATA PROCESSING AND PRIVACY POLICY

For the Epolleo Diversity Platform, Operated by Epolleo Inc.

Effective Date: 07-01-2025

1. OBJECTIVE

This Personal Data Processing and Privacy Policy ("Policy") outlines the legal and operational framework under which Epolleo Inc. ("Epolleo," "we," "our," or "the Company") collects, processes, stores, transmits, shares, and protects personal data in connection with the Epolleo Diversity Platform ("Platform"). The Platform enables users, including students, researchers, licensees, contributors, and public partners, to participate in microbial biodiversity campaigns, claim or issue Diversity Credits, and engage with ecosystem services data. This Policy ensures compliance with applicable federal and South Dakota state data privacy and protection laws and guarantees the rights of all data subjects interacting with the Platform.

2. DEFINITIONS

- **Personal Data:** Any data, whether factual or subjective, about an identified or identifiable natural person, including but not limited to names, emails, phone numbers, addresses, device IDs, and geo-referenced metadata.
 - **Sensitive Data:** Any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data concerning health or sex life. Includes photos, video/audio files, and geolocation data associated with personally identifiable activities.
 - **Public Data:** Information made lawfully available from federal, state, or municipal sources, including business licenses and public registries.
 - **Data Subject:** Any individual whose data is collected and processed by Epolleo.
 - **Data Controller:** Epolleo Inc., which determines the purpose and means of processing personal data.
 - **Data Processor:** A person or entity that processes data on behalf of Epolleo, including cloud infrastructure providers, analytics platforms, contracted researchers, and digital verification systems.
 - **Consent:** Freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which they signify agreement to the processing of personal data.
 - **Transfer:** The movement of data to another legal entity, jurisdiction, or technology stack for processing under different control.
 - **Transmission:** The technical act of sending data for processing, which may or may not involve a change in control.
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3. GOVERNING PRINCIPLES All processing of Personal Data shall adhere to the following principles:

- **Lawfulness, Fairness, and Transparency:** Data is processed lawfully, fairly, and in a transparent manner.
 - **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
 - **Data Minimization:** Only data necessary for the stated purpose is collected and processed.
 - **Accuracy:** Data is accurate and, where necessary, kept up to date.
 - **Storage Limitation:** Data is retained only as long as necessary for the stated purposes or required under law.
 - **Integrity and Confidentiality:** Data is processed in a manner that ensures appropriate security.
 - **Accountability:** Epolleo Inc. is responsible for demonstrating compliance with all these principles.
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4. CONSENT & LEGAL AUTHORIZATION Prior to the collection of any Personal Data, Epolleo shall obtain verifiable consent from the Data Subject or their legal representative. This includes clear opt-in language, explanation of data uses, and the ability to revoke consent. Exceptions include:

- When required by law (e.g., federal grant audits or public record laws)
 - When necessary to fulfill a contractual obligation
 - When needed to protect vital interests of the Data Subject or another person
 - When permitted for public interest research with Institutional Review Board (IRB) oversight
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5. DATA PROCESSING SCOPE & PURPOSE Epolleo collects and processes Personal Data for the following categories and purposes:

- **User Account Management:** Name, email, username, phone number, affiliation, and IP address are used for verification, password recovery, and account-based actions.
- **Campaign Participation:** Location data, photographs, specimen metadata, and timestamps are collected to enable Diversity Credit serialization.
- **Education & Compliance:** Student identifiers and learning metrics (under FERPA) are processed in partnership with schools and educational agencies.
- **Scientific Research & Licensing:** Researcher names, funding affiliation, lab info, and screening intent are stored and audited.
- **Communication:** Email addresses and device tokens are used for notifications, project alerts, security warnings, or policy changes.

- **Analytics & Optimization:** IP address, device information, and behavior tracking (e.g., clicks, views) are used to improve platform performance and user experience.
 - **Security & Auditing:** Logs are collected for internal fraud prevention, authentication logging, and regulatory reporting.
 - **Legal or Regulatory Obligation:** Retention of data for tax, audit, and grant documentation in accordance with IRS and federal agency guidelines.
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6. RIGHTS OF DATA SUBJECTS Each Data Subject has the following rights under U.S. and South Dakota law:

- **Right to Access:** View and obtain a copy of their stored Personal Data.
- **Right to Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Deletion:** Request permanent deletion unless restricted by legal obligations.
- **Right to Restrict Processing:** Suspend specific uses of their data during disputes or investigation.
- **Right to Withdraw Consent:** Withdraw previously granted permissions without penalty.
- **Right to Notification:** Receive notice of data breaches or changes in data handling policies.

Requests must be submitted via: **Email:** info@epolleo.com

Mail: Epolleo Inc., 47080 273rd Ave, Harrisburg, SD 57032-8102

Phone: (605) 880-4193

7. DUTIES OF EPOLLEO INC. Epolleo is obligated to:

- Implement administrative, technical, and physical safeguards to secure personal data
 - Maintain a central record of processing activities
 - Assign a Data Privacy Officer to oversee compliance
 - Conduct annual internal audits on data processing and retention
 - Notify affected individuals and authorities of any data breach within the timeframes defined by law
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8. DATA SHARING, TRANSFERS & THIRD-PARTY ACCESS Epolleo may share personal data under strict confidentiality with:

- Cloud and hosting vendors with encrypted infrastructure (e.g., AWS, Azure)
- Contracted researchers or industry partners under approved SBIR/STTR protocols
- Government agencies (e.g., Department of Education, NIH, NSF) for compliance
- Legal counsel or courts under subpoena

- Analytics and automation platforms for internal analysis (using pseudonymization where possible) No Personal Data will be sold or leased for commercial marketing purposes.
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9. DATA SECURITY & RETENTION Epolloo uses:

- End-to-end encryption
 - Multi-factor authentication
 - Daily backups with failover storage
 - Regular vulnerability scans and penetration tests
 - Retention periods:
 - Active user data: retained for the life of the account
 - Financial/grant records: retained for 7 years
 - Student participation: retained per FERPA agreements
 - Archived biodiversity records: indefinitely for scientific purposes (de-identified)
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10. POLICY ACCESS This Policy will be posted online and updated regularly. Data Subjects may request a printed copy, digital summary, or language translation by contacting info@epolloo.com.

11. CHILDREN’S PRIVACY Children under 13 may not register for the Platform directly. Student accounts must be created and managed via approved educational programs. Consent forms, data agreements, and control of submissions remain with the district or school administrator. Epolloo will never request direct personal contact information from a child without verified parental approval.

12. ACCURACY AND USER RESPONSIBILITY Users are required to provide only truthful, complete, and current information. Any use of falsified, misleading, or impersonated data may result in immediate account termination and potential legal action.

13. AMENDMENTS Epolloo reserves the right to update this Policy at any time. Changes will be posted with 30 days’ advance notice on the Platform. Continued use of the Platform indicates agreement to the amended Policy.

14. GOVERNING LAW This Policy is governed by the laws of the State of South Dakota and the United States of America. Disputes shall be subject to the exclusive jurisdiction of courts located in Minnehaha County, SD.

15. CONTACT INFORMATION Epolleo Inc.

47080 273rd Ave

Harrisburg, SD 57032-8102

Email: info@epolleo.com

Phone: (605) 880-4193

Data Privacy Officer: Tony Hagen, CTO