

Data Protection and Data Processing Policy

1. Purpose

This Data Protection and Data Processing Policy (“Policy”) establishes the principles, standards, and operational practices adopted by Triage (Beyond Zero) Ltd. for the lawful, secure, transparent, and responsible handling of project-related data in connection with carbon sequestration, sustainability, environmental restoration, ecological monitoring, carbon credit development, and associated project activities.

This Policy is designed to align with applicable UK data protection laws, including the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018, where applicable to the processing of personal data.

2. Scope

This Policy applies to all employees, contractors, consultants, advisors, and service providers engaged by Triage (Beyond Zero) Ltd.; all project-related data processed by the Company; all systems, software, cloud platforms, devices, and third-party processors used by the Company; and all sustainability, carbon sequestration, carbon credit, ecological restoration, and environmental monitoring projects administered or supported by the Company.

This Policy applies regardless of whether data is stored electronically, physically, visually, orally, or in any other format.

3. Definitions

Project Data means all data, records, measurements, analyses, imagery, maps, biodiversity records, carbon calculations, reports, project documentation, land-use information, monitoring outputs, and related information associated with a sustainability or carbon sequestration project.

Land Owner or Project Owner/Host means the individual, organisation, trust, company, or legal entity owning or controlling the land or project associated with the Project Data.

Processing means any operation performed on data including collection, recording, storage, organisation, analysis, visualisation, transfer, sharing, retrieval, use, disclosure, deletion, or destruction.

Third-Party Processor means an external contractor, software provider, consultant, verifier, registry, auditor, satellite analytics provider, or other service provider engaged for project delivery purposes.

4. Core Principles

1. Project Data Ownership Remains with the Land Owner or Project Owner.
2. Data is Processed Solely for Legitimate Project Purposes.
3. Third-Party Sharing is Restricted to Project Delivery Requirements.
4. Commercial Exploitation of Project Data Without Permission is Prohibited.
5. Data Security and Confidentiality are Maintained at All Times.
6. Only Necessary Data is Collected and Retained.
7. Transparency and Contractual Clarity are Maintained with Project Participants.

5. Data Ownership

All Project Data supplied to, generated for, or derived from a project shall remain the sole property of the relevant Land Owner or Project Owner unless expressly agreed otherwise in writing.

Triage (Beyond Zero) Ltd. does not claim ownership of land data, environmental measurements, carbon sequestration measurements, biodiversity records, satellite imagery commissioned for a project, project baselines, monitoring results, verification records, carbon issuance documentation, GIS outputs, or project documentation produced specifically for a client project.

The Company may use Project Data solely for purposes reasonably necessary for project development and execution, environmental and carbon analysis, monitoring, reporting, and verification, carbon credit generation and issuance, registry submissions, scientific modelling and validation, project visualisation and mapping, investor or stakeholder reporting relating specifically to the project, and internal operational administration associated with the project.

No transfer of ownership is created through such use.

6. Third-Party Data Sharing

Triage (Beyond Zero) Limited

Triage (Beyond Zero) Ltd. may share Project Data with third parties strictly where necessary for data processing, technical analysis, verification and validation, registry submissions, carbon issuance procedures, scientific assessment, GIS or satellite analytics, environmental monitoring, cloud hosting and storage, professional advisory services, auditing, and quality assurance.

All third-party recipients must process data only for authorised project purposes, maintain appropriate confidentiality obligations, implement reasonable technical and organisational security measures, refrain from selling or independently exploiting Project Data, and return or securely delete data upon request or completion of services where appropriate.

Triage (Beyond Zero) Ltd. shall not sell, license, monetise, or otherwise commercially exploit Project Data independently of the project without the express written consent of the Land Owner or Project Owner.

7. Personal Data

To the extent that Project Data includes personal data, Triage (Beyond Zero) Ltd. shall process such personal data in accordance with applicable UK data protection laws.

Depending on the nature of the processing activity, Triage (Beyond Zero) Ltd. may act as either a data processor acting on behalf of a client or project owner, or a data controller in respect of limited operational, contractual, administrative, legal, or employment-related processing activities.

8. Data Security

Triage (Beyond Zero) Ltd. implements proportionate technical and organisational measures to protect data against unauthorised access, loss, theft, corruption, destruction, misuse, or unauthorised disclosure.

Security measures may include role-based access controls, password protection and authentication controls, encrypted storage and transmission where appropriate, secure cloud infrastructure, backup and recovery procedures, confidentiality obligations, access logging and monitoring, and vendor security assessments where appropriate.

9. Data Retention

Project Data shall be retained only for as long as reasonably necessary for project delivery, carbon credit issuance, verification and audit requirements, legal and contractual obligations, scientific integrity, historical project documentation, and insurance or dispute management purposes.

Upon expiration of retention requirements, data may be securely deleted, anonymised, archived, or returned to the relevant Project Owner where commercially and technically feasible.

10. International Transfers

Where data is processed or hosted outside the United Kingdom, Triage (Beyond Zero) Ltd. shall take reasonable steps to ensure that appropriate safeguards and contractual protections are implemented where legally required.

11. Confidentiality

All personnel, contractors, and service providers handling Project Data must maintain confidentiality regarding all non-public information obtained through project activities.

Confidential information shall not be disclosed except as required for authorised project activities, with consent of the relevant Project Owner, where required by law, or where required by recognised carbon standards, registries, auditors, or verification bodies.

12. Data Subject Rights

Where applicable under UK data protection law, individuals whose personal data is processed may exercise applicable rights relating to access, correction, restriction, objection, erasure, and data portability.

Requests may be submitted to:

Data Protection Contact
Triage (Beyond Zero) Ltd.
Bank Farm
Bank Road
Aldington
Ashford
Kent
TN25 7DF

hello@beyondzero.ag

13. Incident Management

Any suspected or actual data breach, unauthorised disclosure, or security incident must be reported promptly to Company management.

The Company shall investigate incidents proportionately and take reasonable corrective actions, including notification where legally required.

14. Governance and Accountability

Triage (Beyond Zero) Ltd. shall maintain reasonable oversight of data processing activities, review third-party processors where appropriate, maintain contractual protections relating to confidentiality and processing, periodically review this Policy, and train relevant personnel on confidentiality and data handling obligations.

15. Relationship with Project Agreements

This Policy supplements and does not replace any project agreement, carbon development agreement, landowner agreement, non-disclosure agreement, data processing agreement, or commercial contract.

Where contractual provisions impose stricter obligations, those contractual provisions shall prevail.

16. Policy Review

This Policy may be updated periodically to reflect changes in applicable law, operational developments, industry practices, carbon market standards, technological developments, and security requirements.

The latest version shall be maintained by Triage (Beyond Zero) Ltd.

17. Approval

Approved by:



Signed

Date: 1st January 2026

Vaibhav Kadikar
Director Responsible for Health & Safety