



Privacy Policy
Circon Energy LLC
Effective September 1, 2026

CIRCON ENERGY LLC PRIVACY POLICY

Circon Energy LLC and its subsidiaries and affiliates (collectively “Circon” or the “Company”) respect the privacy of the people who visit circonenergy.com and its subdomains (the “Site”) and who correspond with us. This Privacy Policy explains what personal data we collect, why we collect it, how we use and share it, how long we keep it, and the rights available to you.

Scope. This Policy covers personal data collected through the Site and through enquiries sent to the email addresses published on it. It does not cover the employment relationship between Circon and its personnel, which is addressed separately, or the practices of third-party websites we link to.

Who We Are. For the purposes of applicable data protection law, the controller of personal data collected through the Site is Circon Energy LLC, 25511 Budde Road, Suite 2801, The Woodlands, TX 77380, United States. Circon has affiliated entities in Spain and Luxembourg. Neither operates the Site nor determines the purposes or means of processing personal data collected through it. The Site is operated from the United States, and where the General Data Protection Regulation applies to processing described in this Policy, it does so because the Site is made available to visitors in the European Economic Area. Enquiries about this Policy may be sent to info@circonenergy.com.

Data You Give Us. When you contact us — through an address published on the Site, or by responding to us — we collect the information you choose to provide. Typically this is your name, your email address, your employer or organisation, your role, and the content of your message and any attachment to it. If you correspond with us further, we hold that correspondence. We do not require you to create an account, and the Site has no login.

Data Collected Automatically. When you visit the Site, our hosting and security infrastructure processes technical data necessary to deliver pages to you and to protect the Site: your IP address, the date and time of your request, the pages requested, referring URL, and information about your browser, operating system and device. Where you have consented to analytics cookies, we also collect information about which pages are read, how long they are read for and where readers stop.

Cookies and Similar Technologies. The Site uses four categories of cookie: strictly necessary, functional, analytics and marketing. Strictly necessary cookies deliver the Site, keep it secure and remember your cookie choice; they cannot be switched off. Every other category is off until you switch it on, and nothing non-essential loads before you choose. Your choice is stored in your browser and can be changed or withdrawn at any time. The Circon Cookie Policy sets out each category in full.

Sensitive Data. We do not seek and do not want special-category personal data — data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, or data concerning sex life or sexual orientation. Please do not send it to us.

How We Use Personal Data. We use personal data to respond to your enquiry and to correspond with you about it; to evaluate and progress commercial, project, supply, offtake, professional and

investment relationships; to operate, secure, maintain and improve the Site; to understand which content is read, where consent to analytics has been given; to keep records of what was said and agreed; and to comply with legal, regulatory and contractual obligations, including anti-money-laundering, sanctions and anti-corruption screening where that applies.

Legal Bases. Where the General Data Protection Regulation or an equivalent law applies, we rely on the following legal bases:

- **Legitimate interests** — to respond to enquiries, to conduct and develop our business and its relationships, to secure the Site and to keep proper records. We have considered these interests against your rights and freedoms, and you may object as described below.
- **Consent** — for non-essential cookies and for any marketing communications. You may withdraw consent at any time, without affecting processing carried out before withdrawal.
- **Contract** — where processing is necessary to take steps at your request before entering a contract, or to perform one.
- **Legal obligation** — where we must process data to comply with a law to which we are subject.

Marketing. We do not sell personal data, and we do not sell or rent contact details to third parties. We do not operate a general marketing mailing list from the Site. Where we send you material about Circon, we do so on the basis of your consent or an existing business relationship, and every such message tells you how to stop receiving them.

Automated Decision-Making. We do not make decisions producing legal or similarly significant effects about you by automated means, and we do not carry out profiling of that kind.

Sharing and Disclosure. We disclose personal data only as follows: to service providers who act on our instructions and under contract — website hosting, content delivery and security, email and productivity infrastructure, and analytics where consented; to our professional advisers, including legal, tax, accounting and technical advisers, under duties of confidentiality; to counterparties, lenders, investors and their advisers where necessary to progress a transaction and subject to appropriate confidentiality terms; to a purchaser or successor in the event of a corporate transaction affecting the relevant business; and to courts, regulators, law enforcement and other authorities where we are legally required to do so, or where disclosure is necessary to establish, exercise or defend legal claims.

International Transfers. Circon operates in the United States, Puerto Rico, the Dominican Republic, Spain and Luxembourg, and its service providers may process data elsewhere. Personal data originating in the European Economic Area, the United Kingdom or Switzerland may therefore be transferred to countries that have not been found to provide an equivalent level of protection. Where that happens, we rely on an appropriate safeguard recognised by applicable law — ordinarily the European Commission's Standard Contractual Clauses, together with any additional measures the transfer requires. A copy of the relevant safeguard is available on request.

Retention. We keep personal data only as long as it is needed for the purpose it was collected for, or as long as the law requires. Enquiry correspondence that does not lead to a relationship is ordinarily deleted within 24 months. Records connected to a contractual, project or financing relationship are kept for the life of the relationship and for the period afterwards required by applicable limitation periods and by tax, corporate and regulatory record-keeping rules. Technical logs are kept for a short period for security and diagnostic purposes.

Security. We maintain administrative, technical and physical measures appropriate to the risk, including encryption of the Site in transit, access controls, and restriction of personal data to those who need it for a stated purpose. No system is perfectly secure, and we cannot guarantee the security of information you transmit to us over the internet; transmission is at your own risk.

Your Rights. Depending on where you live, you may have the right to ask us for a copy of the personal data we hold about you; to have inaccurate data corrected; to have data erased; to restrict or object to processing, including processing based on legitimate interests and any processing for direct marketing; to receive certain data in a portable format; and to withdraw consent where processing relies on it. You will not be discriminated against for exercising any of these rights.

How to Exercise Them. Write to info@circonenergy.com, or to Circon Energy LLC, 25511 Budde Road, Suite 2801, The Woodlands, TX 77380, United States. We will respond within the period the applicable law allows — one month under the GDPR, extendable where a request is complex. We may need to verify your identity before acting, and we will tell you if an exemption applies to any part of a request.

Appeals. If we decline to act on a request, we will tell you why within the period the applicable law allows. Where the law of your state gives you a right to appeal that decision, you may appeal by writing to info@circonenergy.com with the word “Appeal” in the subject line, or to the postal address above. We will review the appeal and inform you in writing of our decision, and the reasons for it, within sixty days of receipt. If we deny the appeal, we will provide you with a method by which you may contact your state attorney general to submit a complaint.

Complaints. If you are in the European Economic Area or the United Kingdom, you may also complain to the supervisory authority in your country of residence, your place of work, or the place of the alleged infringement. We would ask you to raise the matter with us first so that we can try to resolve it.

Children. The Site is directed to a professional audience and is not intended for children. We do not knowingly collect personal data from anyone under 16. If you believe a child has provided us with personal data, contact us and we will delete it.

Third-Party Links. The Site links to third-party websites and documents. Those sites are governed by their own privacy policies, which we do not control and are not responsible for.

Changes to this Policy. We may update this Policy from time to time. The version in force is the one published on the Site, and the date it took effect is stated on the cover of this document. Where a change is material we will take reasonable steps to bring it to your attention.

Contact. Questions or concerns about this Policy, or about how Circon handles personal data, may be sent to info@circonenergy.com, or by post to Circon Energy LLC, 25511 Budde Road, Suite 2801, The Woodlands, TX 77380, United States.