

PRIVACY POLICY

Effective Date: September 2023

Privacy

Vaki Aquaculture Systems Limited and its local affiliate being a seller under a sales agreement in a respective country (the “**Affiliate**”) identified at the end of this Privacy Policy (as defined below), acting as independent data controllers (the “**Companies**”) are committed to protecting your privacy and your personally identifiable data and other personal information (“**Personal Data**”). The Companies have created this privacy policy (the “**Privacy Policy**”) to let you know what information the Companies collect when you use the product offering (as defined in the Terms of Use (as defined below)) provided by the Companies (the “**System**”), how the Companies collect it and how they make use of it. Please read this Privacy Policy carefully prior to using the System.

Categories of Personal Data Collected

The Companies collect and store the Personal Data when you visit or use the System and when you provide it to the Companies, such as in your communications with the Companies. Types of Personal Data collected includes, without limitation, your name, your farm or other physical address, contact details as well as administrative and traffic data, such as IP address and crash reports, to improve System performance and to ensure your use of the System complies with the terms and conditions and end user license agreement entered into between you and the Companies (“**Terms of Use**”).

If we are unable to collect your Personal Data, we may be unable to provide the System to you.

Use of Personal Data

The Companies use the Personal Data they collect from or about you to:

- Establish and manage the contractual relationship with you, including providing you with our services and customer support.
- Collect and use necessary feedback on the System to test and improve their functionality.
- Evaluate, update and improve the System.
- Conduct statistical and monitoring analysis (including, inter alia, via standard third-party data analytics tools), data analytics, undertake necessary security and identify verification checks, allow software integration with other tools that you use, to track your use of the System and/or for other internal purposes, such as evaluating, providing, and improving the System.
- Provide you with promotional offers and information regarding products and services from the Companies or third parties where you have accepted or consented to receive such offers and information via the System or otherwise.
- Generate aggregated data through the anonymization of your Personal Data.

Where applicable privacy and data protection laws require a legal basis to process Personal Data, the Companies rely on the following lawful bases:

- The performance of the Terms of Use entered into between you and the Companies where provision of the Personal Data is essential for the formation and performance of the Terms of Use;
- The legitimate interests of the Companies during the performance of the Terms of Use entered between your employer or contractor, you and the Companies, as the case may be;
- The legitimate interests of the Companies when enhancing and improving the System and tailoring our communications to you;
- When this is necessary for the Companies to comply with legal obligations (e.g., when the Companies are requested to provide the Personal Data as part of a legal investigation); and
- Your consent, or at your direction.

Where the Companies process your Personal Data on the basis of your consent, you have the right under applicable law to withdraw this consent at any time by contacting us at the details in the Privacy Policy without affecting the lawfulness of the processing based on the consent prior to its withdrawal.



Sharing and Transfer of Your Personal Data

The Companies will share or otherwise disclose your Personal Data to the following categories of recipients in the following circumstances:

- Our corporate affiliates: to fulfil the purposes specified above in accordance with this Privacy Policy.
- Professionals you work with and firms that provide services relevant to your business: to fulfil business purposes in connection with the Terms of Use, and to fulfil business purposes and/or provide relevant information at your request.
- Third party vendors and service providers: to provide and improve the System as well as for specialized services such as customer service, networking, billing, marketing, hosting, data processing and other services related to the System.
- Law enforcement authorities, courts, and administrative or regulatory bodies: to comply with applicable legislation, a court order or legal process.
- Other third parties as necessary: for purposes such as to protect and defend the Companies' (or their licensors') rights or property, prevent fraud or violations of our Terms of Use, and ensure the personal safety of other users of the System or the public at large.
- Potential purchasers or investors: in the event that the Companies sell, assign or transfer some or all of their business or assets to a successor or acquirer, or if the Companies are acquired by or merges with a third party, or if the Companies file for bankruptcy or becomes insolvent, the Companies will disclose, sell, assign or transfer all of your Personal Data as part of the transaction.

Your use of the System will involve the transfer, storage and processing of your Personal Data to jurisdictions outside of your residence, including without limitation the USA and Israel. Where applicable law requires your consent for such transfers, you agree to the transfer by submitting your Personal Data to the Companies. Further, the privacy and data protection laws of such jurisdictions may not be as comprehensive as those in the jurisdiction in which you reside, in which case the Companies will take appropriate measures to ensure your Personal Data is protected in accordance with applicable law.

Any international transfer of your Personal Data from the UK or European Economic Area to a third country shall be supported by an appropriate transfer agreement or other mechanism appropriate to comply with applicable law, including Standard Contractual Clauses that are incorporated into the Privacy Policy by way of reference.

Security

The Companies have implemented suitable security policies, rules and technical measures to protect and safeguard the Personal Data under their control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. The Companies may use third party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to provide the service. These may be located at destinations outside your jurisdiction. By submitting your Personal Data, you agree to this. All of the Companies' employees and data processors that have access to, and are associated with the processing of your Personal Data, are obliged to respect the confidentiality of your Personal Data. However, we cannot guarantee the security of your Personal Data, which will be compromised by unauthorized entry or use of the System.

Links to Other Sites

The System may contain links to other sites. Other sites may also reference or link to the System. The Companies are not responsible for the privacy practices or the content of such other online sites, and any information collected by these third-party online sites is not governed by this Privacy Policy, and the Companies assume no responsibility or liability whatsoever for the policies (including privacy policies), practices, actions or omissions of such third parties.

Your Rights

You can opt-out of marketing emails by utilizing the "unsubscribe" link or other mechanism noted in marketing emails you receive from the Companies.

In accordance with applicable law (including relevant exemptions, as applicable), you may have the *right to object* to or request restriction of processing of your Personal Data, the right to request access, rectification, erasure and portability of your Personal Data or the right to receive confirmation that the Companies hold your Personal Data. Where the Companies are using your Personal Data on the basis of your consent, you have the right to withdraw this consent at any time without affecting the lawfulness of the processing based on the consent prior to its withdrawal. You also



have the right to lodge a complaint in relation to a breach of privacy principles in accordance with the Privacy Policy (see below) or with your data protection authority. To exercise your rights, contact us through one of the methods specified in the contact information section below.

Retention and Deletion of Your Personal Data

The Companies will retain your Personal Data for as long as needed to provide you with the services described in the Terms of Use. This often means that the Companies will keep Personal Data for the duration of your account, which will be terminated in accordance with the Terms of Use. Please note, however, that where applicable legislation requires the Companies to do so, it will be required to keep records of your Personal Data even after such termination during the term established by applicable law.

Contact Information

In the event that you wish to learn more about our data privacy practices or to make a complaint about how the Companies processes your Personal Data, please contact the Companies in the first instance at the contact details below:

Vaki Aquaculture Systems Limited:

Email address: vaki@merck.com.

Address for correspondence: Akralind 4 201 Kópavogur Iceland.

The Affiliate:

| Country | Name of the Affiliate | Email | Address for correspondence |
|---------|----------------------------------|--|---|
| Canada | Biomark Inc. | biomarkservice@merck.com | 705 S. 8th Street, Boise, Idaho 83702, United States of America |
| Chile | MSD Salud Animal S.A.S. | privacidadcl@msd.com | Mariano Sánchez de Fontecilla N° 310, Las Condes, Santiago de Chile |
| Faroos | Intervet Norge AS | dpo.norway@msd.com | Thormøhlens gate 55, 5006 Bergen Norway |
| Iceland | Vaki Aquaculture Systems Limited | MSD_privacy_office@msd.com | Akralind 4 201 Kópavogur Iceland |
| Ireland | Intervet (Ireland) Ltd. | privacy.ah.ie@msd.com | 10 Earlsfort Terrace, Saint Kevin's, Dublin, D02 T380, Ireland |
| Norway | Intervet Norge AS | dpo.norway@msd.com | Thormøhlens gate 55, 5006 Bergen Norway |
| UK | Intervet UK Production Ltd | msdukdp@msd.com | Walton Manor, Walton, Milton Keynes, Buckinghamshire, MK7 7AJ UK |
| USA | Biomark Inc. | biomarkservice@merck.com | 705 S. 8th Street, Boise, Idaho 83702, United States of America |

The Companies will endeavour to deal with your request as soon as possible.

Where applicable, you have the right to lodge a complaint with a data protection authority.

Change to this Policy

The Companies reserve the right to make, from time to time, changes and updates to this Privacy Policy as shall be provided in the System. You are responsible for regularly familiarising yourself with our communication to obtain timely notice of such changes. If you do not agree to the altered Privacy Policy, you may stop using the System.

