



TERRA INDUSTRIES

PRIVACY NOTICE

1. Purpose and Scope

1.1 Purpose

At Terra Industries, trust is an important value. Be it with Staff, Team Members, or Customers, we believe that mutual trust is a key ingredient to our success. In light of this, we maintain an active flow of information and communication with our Data Subjects, and we encourage transparency in all that we do. We respect the privacy of everyone we do business with, and we are committed to protecting their Personal Data. It is our opinion that everyone should know what information we collect, what we do with their information, who we share it with, and why it is shared. This ensures we comply with privacy and data protection regulations around the globe while building and maintaining relationships with customers.

1.2 Scope

This Privacy Policy applies to all the Personal Data collected or processed by Terra Industries through any channel or via any system related to all customers of Terra Industries. It explains what information we collect, process, and share. It describes the information we collect, how, and why we collect it. It describes how and why we use and share that information. Lastly, it describes the rights and choices Data Subjects have regarding their information. This Privacy Policy forms the basis of our Privacy Notices to our Customers.

2. Definitions

For purposes of this Policy, the following terms have the following definitions:

2.1. Applicable Law means and includes the following:

- The EU General Data Protection Regulation (EU-GDPR) (EU)
- The Nigerian Data Protection Act 2023 (NDPA)
- The Ghana Data Protection Act
- Various US State Laws, including:
 - a. The California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA) (California)
 - b. The Colorado Privacy Act (CPA) (Colorado)
 - c. The Connecticut Act Concerning Personal Data Privacy and Online Monitoring (CTDPA) (Connecticut)
 - d. The Utah Consumer Privacy Act (UCPA) (Utah)
 - e. The Consumer Data Protection Act (CDPA) (Virginia)
 - f. The privacy and data protection laws of any other jurisdictions where Terra Industries actively does business.

2.2. Data Subject: This means the identified or identifiable living individual to whom Personal Data relates. For purposes of this Policy, Data Subjects include any individuals defined as Data Subjects (or their reasonable equivalents) under all Applicable Law, which are

- Terra Industries customers.
- Terra Industries Contractors: Third parties engaged to provide services to Terra Industries Customers on a contractor basis
- Terra Industries Customer Administrators and Authorized Users: Individuals accessing Terra Industries Software Platform on behalf of a Terra Industries Customer for the purpose of administering the Customer account and binding the Customer to the actions taken in the Platform.
- Terra Industries Prospects: Individuals that Terra Industries has identified as potential Customers.
- Terra Industries means Terra Industries, a company registered with the Corporate Affairs Commission in Nigeria, the state of Delaware in the United States of America, and the ORC in Ghana
- Terra Industries **Customer** means an entity or individual that contracts with Terra Industries for the provision of services by or through Terra Industries.
- **Personal Data (or Personal Information)** means any information about an individual or legal person from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3. Policy Statement

Terra Industries Role

In general, Terra Industries acts as a “data controller” (or its equivalent) under Applicable Law. We control what information we collect and how and why we process that information. In some cases, Terra Industries and a Terra Industries Customer or Terra Industries and an Terra Industries subsidiary may be independent data controllers.

Our role depends on both the applicable Data Subject and the nature of the data at issue Terra Industries Candidates, Terra Industries Staff, Terra Industries Prospects, Terra Industries Connect Community Members, Terra Industries Customer Administrators, and Website Visitors: For data related to these Data Subjects, we generally act as a data controller because we determine the Privacy Policy, what information we need to collect and how we will process that information. Terra Industries is the sole data controller for this information.

4. Data Protection Principles

While Terra Industries acts in accordance with Applicable Laws, we follow globally accepted principles of data protection, which are:

- Lawfulness, Fairness, and Transparency: Personal Data is processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- Purpose Limitation: Personal Data is collected for specified, explicit, and legitimate purposes and is not further processed in a manner that is incompatible with those purposes;
- Data Minimisation: Personal Data collection and processing is adequate, relevant, and limited to what is necessary in relation to the purposes for the processing;
- Accuracy: Personal Data is accurate and, where necessary, kept up to date; every reasonable step is taken to ensure that inaccurate Personal Data is erased or rectified without delay;
- Storage Limitation: Personal Data is kept in a form that permits identification of data subjects for no longer than is necessary for the purposes of processing; but Personal Data may be stored for longer periods for archiving purposes in the public interest, scientific or historical research purposes, statistical purposes where appropriate technical and organizational measures are in place as required by Applicable Law, or where retention is required by law;
- Integrity and Confidentiality: Personal Data is processed in a manner that ensures appropriate security of the Personal Data, including protection against
 - unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- Accountability: The data controller is responsible for, and can demonstrate, compliance with these data protection principles.

5. Information Terra Industries Collects

We collect, store, and use the following categories of Personal Data to provide and our services.

Data Subject Type	Data Collected
Commercial Customers (Civilian)	Name, company details, contact information, contract data, payment information, product usage data, communication records.

Government & Defence Customers	Authorized representative details, contract and procurement data, delivery addresses, security clearance references (where required by contract), communication records.
Suppliers & Partners	Contact details, company registration data, tax information, payment details, contract records, due diligence data.
Prospects	Name, company, contact details, product interest (collected through inquiries, events, or outreach).
UAV/UGV System End-Users (Civilian)	Operational data generated through use of Terrahaptix systems — which may include location, imagery, or telemetry data captured in civilian deployments.

Most of this data is collected directly from Data Subjects. In some cases, the data is submitted to the Terra Industries Platform from a third-party service used by the Terra Industries Customer. We refer to these connections as “Third-Party Integrations.” And finally, we may collect information directly from Third Parties (for example, the results of background checks).

Summary: Terra Industries collects Personal Data either directly from the Data Subject or indirectly from Customers or Third Parties. When Terra Industries receives Personal Data from a Third Party, that Third Party must affirm that they have the right to provide Terra Industries with the Personal Data.

We may also process your personal information to post testimonials on our sites, but will first obtain your consent to use your name and testimonial.*

5.1. Why Terra Industries Collects and Processes Information

At Terra Industries, data is at the heart of what we do; however, we are mandated under certain

regulations, including the EU-GDPR, the NDPA, and the GDPA to specify the legal basis for our processing. For that purpose, we process data on the following legal bases:

- **Contractual Necessity (CN);** Terra Industries needs to process the at-issue Personal Data, either to perform under a contract to which the Data Subject is a party or to take steps at the Data Subject’s request before entering a contract with the Data Subject.
- **Legitimate Interest (LI);** Terra Industries has a legitimate interest in processing the at-issue Personal Data, there is no less intrusive way to achieve the same results, and Terra Industries’s interests outweigh the Data Subject’s interests, rights, and freedoms.

- **Legal Obligation (LO);** Terra Industries is required to process the at-issue Personal Data to comply with a legal obligation.
- **Consent (C):** Data Subjects have the choice and control over whether or how Terra Industries processes their Personal Data.
- **Vital Interests (VI);** Terra Industries may process certain Personal Data if it feels it is essential for the protection of an individual's life.

5.2. Change of Purpose

We will only use the Personal Data we collect for the purposes for which we collect it, unless we

reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use a Data Subject's Personal Data for an unrelated purpose, we will notify the Data Subject and explain the legal basis that allows us to do so.

Summary: We'll notify Data Subjects if we ever change why we're processing their Personal Data.

6. Terra Industries' Processing of Sensitive Information

"Special categories" of particularly sensitive personal information, such as information about a Data Subject's health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection. That means we need to have further justification for collecting, storing, and using this type of Personal Data. We may process the special categories of Personal Data described above in the following circumstances:

- In limited circumstances, with explicit, written consent;
- Without consent, where we need to carry out our legal obligations or exercise rights in connection with employment, or
- Without consent, where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims; where it is needed to protect the Data Subject's interests (or someone else's interests) and the Data Subject is not capable of giving consent; or where the Data Subject has already made the information public.

Examples of situations in which we may process particularly sensitive Personal Data are listed below:

- We will use information about a Data Subject's physical or mental health, or disability status, to ensure their health and safety in the workplace and to assess their fitness to

work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions, and permanent health insurance.

- If a Data Subject leaves their employment and, under any share plan operated by a group company, the reason for leaving is determined to be ill-health, injury, or disability, we will use information about their physical or mental health or disability status in reaching a decision about their entitlements under the share plan.
- If a Data Subject applies for an ill-health pension under a pension arrangement operated by a group company, we will use information about their physical or mental health in deciding their entitlement.
- We will use information about a Data Subject's race or national or ethnic origin, religious, philosophical or moral beliefs, sexual life or sexual orientation, or disability status to ensure meaningful equal opportunity monitoring and reporting and to comply with legal obligations.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee, and to comply with employment law obligations.

6.1. Information about Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations, and only where we do so in line with our privacy standard. We will only collect information about criminal convictions if it is appropriate, given the nature of the Data Subject's role and where we are legally able to do so. We have in place an appropriate policy and safeguards, which we are required by law to maintain when processing such data.

7. Information Sharing with Third-Party Data Processors

We share Personal Data with third-party service providers and with Terra Industries subsidiaries for the purpose of providing our Services in accordance with our contractual obligations (CN), to facilitate our legitimate interests (LI), or where required by law (LO). We review all third-party service providers and require them to respect the security of your data and to treat it in accordance with the law. The services provided by these third parties may include:

- Hosting and Storage
- Payroll Processing

- Human Resources Management
- Pension and Benefits Administration
- Billing
- Customer Support and Management
- Email Services
- Data Analytics and Predictive Analysis
- Information Security and Privacy
- Communications and Marketing

Where we are a data controller, these third parties are our processors. Where we are a data processor, these third parties are our sub-processors. We require all third parties that may have access to Personal Data to enter Data Processing Agreements with us that only permit them to process such Personal Data for the specified purpose and in accordance with our instructions.

7.1. Information Sharing with Independent Data Controllers (Including Customers) and Third-Party Integrations

As part of our provision of services, Terra Industries may share data with independent data controllers, for example, Terra Industries Customers. Where Terra Industries shares Personal Data with independent data controllers, Terra Industries will only share the Personal Data that is necessary to provide services.

Personal Data shared in this manner may include Contact Information, Personal Details, Employer Information, Position Details, Contract Terms, Pension Information, Messaging Data, User Profile Data, and Website Usage and Technical Data.

7.2. Information Sharing with Other Third Parties

Please note that Terra Industries may also share Personal Data with other third parties, for example, in the context of the possible sale or restructuring of our business. In this situation, we will, where possible, share anonymised data with the other parties before the transaction is complete. Once the transaction is complete, we will share Personal Data with the other parties if and only where required under the terms of the transaction. We may also need to share Personal Data with a regulator or to otherwise comply with the law.

7.3. Aggregate Data Sharing

Terra Industries may aggregate or otherwise strip data of all personally identifying characteristics and may share the aggregated, anonymised data with third parties. In such cases, we may use the Information without further notice to Data Subjects.

8. How Terra Industries Stores and Protects Personal Data

Terra Industries cares about the security of Personal Data and has put measures in place to preserve the confidentiality, integrity, and availability of all the Personal Data we collect. We have also put in place appropriate security measures to prevent Personal Data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. We limit access to Personal Data to those employees, agents, contractors, and third parties who have a business need to know, based on the purposes and as described above. Additionally, we have put procedures in place to deal with any suspected data security incidents and will notify affected Data Subjects and any applicable regulator of a suspected breach where we are legally required to do so.

If you suspect a security incident related to your personal Data at Terra Industries, please fill out our Suspected [Data Incident Reporting Form](#).

9. Terra Industries' Data Retention Policies

We will only retain Personal Data for as long as necessary to fulfil the purposes for which we collected it and to satisfy any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of the Personal Data, the purposes for which we process the Personal Data and whether we can achieve those purposes through other means, and all applicable legal requirements.

In general, we retain Customer Records, including Contracts: 7 years following termination of a contractual relationship.

10. Data Protection Rights

Under certain circumstances, and under Applicable Law, Data Subjects have individualised rights based on certain factors, such as their location, citizenship, or residence. At Terra Industries, trust is one of our core values, so we believe that all users should be given the broadest privacy rights possible, regardless of where they are based or where they are from. For that reason, all Data Subjects at Terra Industries have the right to:

- Request Access to their Personal Data (commonly known as a “data subject access request” or “DSAR”). This allows them to receive a copy of their Personal Data and to ensure that we are lawfully processing it.

- Request Correction of their Personal Data. This allows them to have any incomplete or inaccurate records completed or corrected.
- Request Erasure of their Personal Data (commonly known as a “deletion request”). This allows them to ask us to delete or remove Personal Data where there is no reason for us to retain or continue processing it.
- Object to the Processing of their Personal Data where we are relying on a legitimate interest (or those of a third party) and there is some reason they object to our processing on that basis. They can also object to our processing of their Personal Data where we are doing so for direct marketing purposes.
- Request the Restriction of the processing of their Personal Data. This allows them to ask us to suspend the processing of their Personal Data, for example, if they want us to establish its accuracy or our reason for processing it.
- Request the Portability of your Personal Data in a machine-readable format and the transfer to another party.

If a Data Subject wants to review, verify, correct, or request erasure of their Personal Data, object to the processing of their Personal Data, or request that we transfer a copy of their Personal Data to another party, they can do so by filling out our [Privacy Rights Request Form](#).

10.1. No Fee (Usually) Required

Data Subjects will not have to pay a fee to access their Personal Data (or to exercise any of the other rights). But we may charge a reasonable fee if their request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

10.2. What We May Need

In some cases, we may need to request specific information from a Data Subject to help us confirm their identity and to ensure their right to access the information (or to exercise any of their other rights). This security measure is in place to ensure that Personal Data is not disclosed to any person who has no right to receive it.

11. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where a Data Subject may have provided their consent to the collection, processing, or transfer of their Personal Data for a specific purpose, they have the right to withdraw their consent to that specific processing at any time. In most cases, a way to withdraw consent should be readily apparent; for example, Data Subjects can opt out of

marketing emails by unsubscribing or can change their cookie settings at any time. Any questions or requests to withdraw consent that are not apparent should be directed to dpo@terrahaptix.com. Once we have received notification that a Data Subject has withdrawn their consent, we will no longer process their information for the purpose or purposes to which they originally agreed, unless we have another legitimate basis under the law for doing so.

12. Changes to this Notice

We may change this Privacy Notice from time to time. If we make any material changes, we'll provide notice on the Terra Industries website homepage or via the email address we have on file for Data Subjects. We will comply with applicable law with respect to any changes we make to this Policy and will seek Data Subject consent to any material changes if required by applicable law.

13. Contact Information

We have appointed a Data Protection Officer to oversee compliance with this Privacy Policy. For any questions about this Policy or how we handle Personal Data, please contact our Data Protection Officer at dpo@terrahaptix.com or at:

Data Protection Officer

Terrahaptix,

Address; Plot 1279 Ikogosi Springs St, Maitama, Abuja 904101, FCT, Nigeria

Data Subjects may also complain to their country's (or State's) proper oversight agency. We would, however, appreciate the chance to deal with any concerns directly before such a complaint is filed.