

## DATA PROTECTION AND DISCLOSURE POLICY

Canopy Trust follows the data protection and disclosure policy of Catalytic Finance Foundations as noted below

### 1. PURPOSE

The purpose of this policy is to establish the Catalytic Finance Foundation's ("Catalytic") commitment to transparency, data protection, and responsible disclosure at both the corporate and project levels. This policy is aligned with applicable data protection laws and regulations, including Swiss data protection regulations, and fosters a secure and ethical data management environment.

### 2. SCOPE

This policy applies to all Catalytic employees, contractors, and partners who handle personal data or are responsible for information disclosures related to Catalytic's corporate or project activities.

### 3. DATA COLLECTION

Catalytic collects personal and organizational data strictly necessary for its operational and project-related needs. The types of data collected include:

**Personal Information:** Names, contact information, financial details, and other relevant identifiers needed for project management, communications, and compliance.

**Project and Partner Data:** Information relating to partners and projects, subject to confidentiality agreements where applicable.

Data is collected transparently and for predefined purposes only, ensuring Catalytic complies with legal and ethical standards.

### 4. USE OF DATA

Data is used solely for the purposes for which it was collected, such as managing projects, communications, compliance, and fulfilling legal obligations. Catalytic doesn't sell Data and protects its Data from third parties that may use it for other purposes.

### 5. DATA PROTECTION

#### Data Protection Principles

Catalytic adheres to core data protection principles:

**Lawfulness, Fairness, and Transparency:** Data is processed lawfully and transparently to individuals.

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**Data Minimization:** Only data essential for specified purposes is collected.

**Accuracy:** Data is maintained accurately and updated as needed.

**Storage Limitation:** Data is stored only for the time necessary to fulfil its purpose.

**Integrity and Confidentiality:** Appropriate security measures, including encryption and access control, are in place to prevent unauthorized access or data breaches.

### Protected Data Categories

**Protection of Customers:** The Catalytic privacy policy<sup>1</sup> outlines the commitment to safeguarding customer data, including how information is collected, used, and protected. Specific data protection measures include secure storage, restricted access, and adherence to privacy laws.

**Protection of Business and Partners:** Prior to the exchange of any sensitive information with its partners, Catalytic requests the partner to sign a Non-Disclosure Agreement (NDA) which defines the rules for protecting confidential information about potential projects. It covers the definition of confidential information, usage limitations, disclosure permissions, and the return or destruction of confidential documents upon termination of discussions. The agreement specifies that the confidentiality obligations last for a minimum of three years after the agreement expires. After the NDA is signed, Catalytic keeps a signed copy in the shared folder.

**Protection of Employees and Accounting:** The Swiss Code of Obligations<sup>2</sup> governs accounting and HR practices, ensuring compliance with standards related to financial reporting, employee rights, and data protection. This includes regulations on maintaining accurate records, safeguarding employee information, and ensuring transparency and fairness in employment practices. More details can be found in the Swiss Code of Obligations.

## 6. PROJECT-LEVEL DISCLOSURE

For project-level disclosures, Catalytic commits to publishing information relevant to environmental and social impacts, in line with applicable regulatory and partner requirements.

- **Environmental and Social Impact Disclosures:** For projects or programs potentially impacting the environment or social contexts, Catalytic will disclose necessary documentation (e.g., Environmental and Social Impact Assessments or Management Plans) within timelines required by regulatory bodies or partners (e.g., 120 days prior for high-impact projects).
- **Public Availability:** Documents related to projects with significant environmental or social impacts will be accessible on Catalytic's website and in locations convenient to affected stakeholders. These documents will be available in both English and any relevant local languages.

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<sup>1</sup> <https://www.catalyticfinance.org/privacy-policy>

<sup>2</sup> <https://www.fedlex.admin.ch/eli/cc/2022/491/en>

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- **Information on Request:** Catalytic will respond to requests for additional program information. If data is confidential or unavailable, a legitimate reason will be provided for non-disclosure.

## **7. DATA SECURITY**

Appropriate technical and organizational measures are in place to protect personal data, including encryption, access controls, and secure data storage.

## **8. DATA BREACH**

In the event of a data breach, Catalytic will promptly notify affected individuals/partners and relevant authorities as required by law.

## **9. RESPONSIBILITIES**

All employees and partners are responsible for adhering to this policy. The Operations Manager is responsible for overseeing data protection compliance and addressing any concerns.