

H2 SUSTAINABLE HOSPITALITY TOOLBOX

Privacy Policy

Effective Date: 25 July 2026

1. Introduction and Scope

This Privacy Policy explains how H2 Sustainability Consulting ("H2", "we", "us", or "our") collects, uses, shares, and protects personal information in connection with the H2 Sustainable Hospitality Toolbox (the "Toolbox"), the website at h2sustainabilityconsulting.com (the "Platform"), and related communications. It applies to visitors, prospective Members, active Members, and individuals who contact us, regardless of location.

This Policy is incorporated by reference into, and forms part of, the Terms and Conditions (Master Agreement).

2. Who We Are

H2 Sustainability Consulting, founded by Hervé Houdré, is the data controller responsible for personal information processed in connection with the Toolbox and Platform, unless otherwise stated (for example, where a Corporate Account subscriber is itself the controller of its own employees' data, as described in Section 12).

Contact: herve@houdre.com | Greenwich, CT - USA.

EU/UK Representative: to be appointed upon H2's first EU/UK Member sign-up. H2 offers the Toolbox to, and monitors the behaviour of, individuals in the EU and UK, and will appoint a formal EU/UK representative as required under GDPR/UK GDPR Article 27 at that point, consistent with a pragmatic, risk-based approach confirmed with counsel for an early-stage business with no current EU/UK Members. H2 has also conducted a threshold assessment regarding whether a Data Protection Officer (DPO) is required under Article 37; that assessment is documented internally and available to regulators on request.

3. Personal Information We Collect

We collect the following categories of personal information:

- Account information: name, email address, job title, company/property name, country, and password (stored in encrypted form)
- Subscription and billing information: Subscription Level, billing address, and transaction history. Full payment card details are collected and stored by our payment processor, not by H2 directly (see Section 7)
- Content you submit: questions and information you provide through AEQUOR Advisory, and any correspondence you send us

- Usage data: pages visited, features used, log-in times, and general engagement with the Toolbox, collected automatically
- Technical data: IP (Internet Protocol) address, browser type, device type, and similar technical identifiers, collected automatically
- Marketing preferences: whether you have opted in or out of marketing communications
- Professional credentials or certifications, where voluntarily provided for verification purposes
- Any other information you voluntarily provide in free-text fields, such as AEQUOR Advisory questions or correspondence

We do not intentionally collect special categories of personal information (such as health data, racial or ethnic origin, or religious beliefs) and ask that you do not include such information in any AEQUOR Advisory question or correspondence. If such information is submitted without having been requested by H2, H2 reserves the right to delete it.

4. How We Use Personal Information

We use personal information to:

- Create and administer your account and provide the Toolbox
- Process payments and manage billing, renewals, and cancellations
- Respond to AEQUOR Advisory questions and support requests
- Send service communications (for example, billing notices, renewal reminders, and policy updates)
- Send marketing communications, including H2 Prism Briefs previews and Toolbox updates, where you have opted in or as otherwise permitted by law, and always with an option to opt out
- Maintain the security of the Platform and detect or prevent misuse, including unauthorised use of Content under the Intellectual Property & Acceptable Use Policy
- Understand how the Toolbox is used, in order to improve it
- Comply with legal obligations, including tax and accounting requirements
- Create anonymised, aggregated insights and examples — for instance, general patterns drawn from AEQUOR Advisory questions, such as illustrative return on investment (ROI) calculations or common sustainability challenges — for use in H2 Prism Briefs, case studies, or other Toolbox Content

Where H2 does this, information is anonymised so that it can no longer reasonably be used to identify you or your property before it is used in this way; H2 does not publish or share identifiable details of a Member's specific question or property without separate consent. If you would prefer your AEQUOR Advisory questions not be used to inform anonymised, aggregated examples of this kind, contact herve@houdre.com and H2 will exclude your account from this use.

As required under the Connecticut Data Privacy Act (CTDPA): H2 does not use Member personal information, including AEQUOR Advisory questions, to train, fine-tune, or otherwise develop any

artificial intelligence (AI) or large language model (LLM). If this changes in future, H2 will update this Policy and provide a clear opt-out mechanism before doing so.

5. Legal Bases for Processing

For individuals in the European Union (EU) and United Kingdom (UK), we rely on the following legal bases under the GDPR / UK GDPR:

- Performance of a contract — to create your account, provide the Toolbox, and process payments
- Legitimate interests — to maintain security, prevent misuse, improve the Toolbox, support business development and internal administration, and protect H2's intellectual property rights, in each case balanced against your rights and interests
- Consent — for marketing communications and non-essential cookies, which you may withdraw at any time
- Legal obligation — where processing is required to comply with applicable law, such as tax record-keeping

6. Cookies and Similar Technologies

The Platform uses cookies and similar technologies to operate securely, remember your preferences, and understand usage patterns. We use the following categories:

- Essential cookies — required for the Platform and account log-in to function, and which cannot be disabled
- Analytics cookies — help us understand how the Toolbox is used, so we can improve it (see Section 8)
- Marketing cookies — used only where you have consented, to measure the effectiveness of marketing communications

H2 does not currently use analytics or marketing cookies. The Platform uses only strictly necessary cookies, which are exempt from consent requirements under applicable law. If H2 introduces analytics or marketing cookies in future, this Policy will be updated and a cookie consent banner will be implemented to obtain affirmative opt-in consent before any such cookies are set.

7. Payment Processing

Subscription payments are processed by third-party payment processors — currently Stripe and PayPal, with the Member choosing which to use at checkout. Whichever processor a Member selects collects and stores their full payment card or account details directly, under that processor's own privacy policy and security standards (including Payment Card Industry Data Security Standard (PCI DSS) compliance). H2 receives confirmation of payment and limited transaction information, but does not directly store full card numbers. H2's agreements with its payment processors include appropriate contractual protections addressing responsibility in the event of a breach on a processor's systems.

8. Analytics

H2 does not currently use third-party analytics tools (such as Google Analytics). The Platform's membership system tracks which Content a Member has downloaded, as ordinary account and usage data used to support Members and understand engagement with the Toolbox; this is not third-party behavioural tracking and does not involve cookies beyond those described in Section 6. If H2 introduces analytics tools in future, this Policy will be updated accordingly.

9. Marketing Communications

If you have opted in to marketing communications, we may email you with H2 Prism Brief previews, Toolbox updates, and relevant sustainability insights. You may opt out at any time using the unsubscribe link in any marketing email, or by contacting herve@houdre.com. Opting out of marketing does not affect service communications necessary for your subscription (such as billing notices), which continue for the duration of an active subscription.

10. Data Sharing and Third Parties

We share personal information only as necessary, with:

- Payment processors, to process subscription payments
- Hosting, email, and analytics service providers, to operate the Platform and communicate with Members
- Professional advisers (for example, accountants or lawyers), where necessary for our legitimate business purposes
- Regulators or authorities, where required by law
- A successor entity, in the event of a merger, acquisition, or sale of all or part of H2's business, subject to that entity continuing to protect personal information in a manner consistent with this Policy

We do not sell personal information to third parties for their own independent marketing purposes. Service providers listed above receive personal information solely to perform services on H2's behalf, for H2's business purposes, and not in exchange for valuable consideration paid to H2, which is not a "sale" under CCPA. As H2 does not use ad pixels or behavioural advertising, and will disable advertising features in any future analytics tool, H2 does not "sell" or "share" personal information as defined by the CCPA/CPRA, and the "Do Not Sell or Share My Personal Information" opt-out link is not required. H2's contracts with service providers (such as hosting and analytics providers) include service-provider language restricting them from using personal information for any purpose other than performing services for H2, to maintain this position.

11. International Data Transfers

H2 is based in the US, and personal information may be transferred to, stored, and processed in the US and other countries where H2 or its service providers operate. Where personal information is transferred from the EU, UK, or other jurisdictions with data transfer restrictions, H2 will use

appropriate safeguards required by law, such as Standard Contractual Clauses, supported by a transfer impact assessment. H2 is evaluating certification under the EU-US Data Privacy Framework (DPF) to further simplify these transfers.

12. Corporate Accounts

Where an organisation holds a Corporate Account and its employees or representatives are given individual log-ins, that organisation may itself act as a data controller in respect of its employees' use of the Toolbox, with H2 acting as a data processor for certain data. Where a data processing addendum (DPA) is required, H2 will provide its own standard-form DPA on request, as set out in the Terms and Conditions, rather than executing a Corporate Account's own DPA template.

13. Data Retention

We retain personal information for as long as your account is active, and generally as follows afterwards: account information for 12 months post-cancellation, to support Members who cancel during the off-season and return the following year, consistent with the seasonal nature of hospitality operations; and billing and transaction records for 7 years post-cancellation, to comply with tax and accounting obligations. These periods have been confirmed with H2's accountant and legal counsel. Where information is no longer needed for these purposes, we will delete or anonymise it.

14. Your Rights

14.1 Rights for EU/UK Individuals (GDPR)

Subject to applicable conditions and exceptions, you have the right to: access the personal information we hold about you; request correction of inaccurate information; request erasure ("the right to be forgotten"); request restriction of processing; object to processing based on legitimate interests or for direct marketing; request data portability; and lodge a complaint with your local data protection authority.

14.2 Rights for California Residents (CCPA)

Subject to applicable conditions and exceptions, California residents have the right to: know what personal information we collect, use, and disclose; request deletion of personal information; correct inaccurate personal information; opt out of the sale or sharing of personal information (see Section 10); and not be discriminated against for exercising these rights.

14.3 Rights for Connecticut Residents (CTDPA)

As H2 is based in Connecticut, we specifically note that Connecticut residents have rights under the Connecticut Data Privacy Act (CTDPA), including the right to: access, correct, and delete personal information; obtain a portable copy of your data; and opt out of targeted advertising, the sale of personal information, and profiling in furtherance of decisions that produce legal or similarly significant effects.

14.4 How to Exercise Your Rights

To exercise any of these rights, including a deletion request, contact herve@houdre.com. We will respond within the timeframe required by applicable law (generally 30 days for GDPR requests and 45 days for CCPA requests, each subject to permitted extensions), and may need to verify your identity before actioning a request.

15. Children's Privacy

The Toolbox is intended for business professionals aged 18 and over and is not directed at children. We do not knowingly collect personal information from children. If we become aware that we have inadvertently collected such information, we will delete it.

16. Data Security

We use reasonable administrative, technical, and organisational measures designed to protect personal information against unauthorised access, loss, misuse, or alteration, including encryption in transit, access controls, and working with reputable service providers. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. Any liability arising from a security incident is subject to the Limitation of Liability clause in the Terms and Conditions.

17. Data Breach Notification

In the event of a personal data breach that poses a risk to your rights and freedoms, H2 will notify affected individuals and relevant regulators as required by applicable law, including within 72 hours of becoming aware of a breach where required under GDPR/UK GDPR. H2 maintains an internal incident response plan to support meeting this timeframe.

18. Changes to this Policy

We may update this Policy from time to time to reflect changes in our practices or legal requirements. We will post the updated Policy on the Platform with a revised effective date and, for material changes, will make reasonable efforts to notify active Members in advance, consistent with the Terms and Conditions.

19. Contact

Questions about this Policy, or requests to exercise your privacy rights, may be directed to:

H2 Sustainability Consulting

Attn: Hervé Houdré

Greenwich, CT - USA

Email: herve@houdre.com

Telephone: +1-347-371-3683