

GDPR COMPLIANCE

VERADA INC. • UPDATED SEPTEMBER 2026

Verada Inc. (the "Company") is committed to compliance with Regulation (EU) 2016/679, the General Data Protection Regulation ("GDPR"), and other applicable data protection laws. The Company maintains technical and organizational measures designed to protect Personal Data processed by the Company and Personal Data processed on behalf of its customers. The principal measures and commitments are summarized below.

1. Compliance with applicable law

The Company complies with the GDPR and monitors relevant developments in applicable data protection law, updating its practices where reasonably necessary.

2. Safeguarding Personal Data

The Company maintains appropriate technical and organizational measures designed to protect Personal Data against unauthorized or unlawful processing and against accidental loss, destruction, alteration, or damage.

3. Fair and limited processing

Customer Personal Data is treated as confidential. When acting as a processor, the Company processes such data only on documented instructions from the customer and as necessary to provide the agreed services, except where otherwise required by applicable law. The Company will assist with correction of inaccurate Customer Personal Data when instructed by the customer.

4. Personnel and data protection governance

Access to Personal Data is restricted to authorized personnel who require it for their assigned duties. Relevant personnel are subject to confidentiality obligations and receive appropriate privacy and security guidance. Verada Inc. has designated Rajiv Sunkara as its Data Protection Officer. He may be contacted at privacy@verada.ai.

5. International transfers

The Company processes and transfers Customer Personal Data in accordance with applicable data protection law and the customer agreement. Where Personal Data is transferred outside the European Economic Area to a country without an applicable adequacy decision, the Company uses an approved transfer mechanism, such as the European Commission Standard Contractual Clauses, together with supplementary measures where appropriate.

6. Consent and lawful basis

The customer, as controller, is responsible for identifying the lawful basis for processing and obtaining any consent required from Data Subjects. The Company's services include mechanisms intended to help customers respect consent choices and Data Subject rights.

7. Transparency

The customer is responsible for providing any notices required to its users regarding processing performed through the services. The Company processes Customer Personal Data only for the purposes described in the applicable customer agreement and documented instructions, unless otherwise required by law.

8. Privacy policies and disclosure

The Company maintains external privacy information and internal policies governing the secure and lawful processing of Personal Data. Customer Personal Data is not disclosed to third parties except as permitted by the customer agreement, on the customer's documented instructions, or as required by applicable law.

9. Personal Data Breach

If the Company becomes aware of a Personal Data Breach affecting Customer Personal Data, it will: (i) promptly take appropriate corrective action to contain and remediate the incident and reduce the likelihood of recurrence; (ii) notify the affected customer without undue delay and, in any event, within twenty-four (24) hours, providing reasonably available details regarding the nature and likely impact of the breach; and (iii) provide reasonable cooperation required by applicable law or the customer agreement. The customer remains responsible for determining whether and how to notify Data Subjects, regulators, employees, service providers, or the public, except where the Company has an independent legal obligation.

10. Retention and deletion

Customer Personal Data is retained only for as long as necessary to provide the agreed services or satisfy applicable legal obligations. On termination of the services, or upon a valid customer request, the Company will return or delete Customer Personal Data in accordance with the customer agreement, applicable law, and established backup-retention cycles.

11. Rights of Data Subjects

Taking into account the nature of the processing, the Company will provide reasonable assistance to customers in responding to requests by Data Subjects exercising their rights under Articles 12-22 of the GDPR where the relevant Personal Data is processed through the Company's services.

12. Special categories of Personal Data

The services are not intended for the processing of special categories of Personal Data under Article 9 of the GDPR or Personal Data relating to criminal convictions and offences under Article 10, unless expressly agreed in writing and supported by appropriate safeguards.

13. Security measures

The Company maintains risk-based technical and organizational security measures designed to preserve the confidentiality, integrity, availability, and resilience of systems and Customer Personal Data. These measures are reviewed and updated as appropriate in light of evolving risks, technology, and legal requirements.

This statement is a summary of Verada Inc.'s GDPR compliance commitments. Specific processing terms, security obligations, and service arrangements are governed by the applicable customer agreement and data processing terms.