SUNO FINANCE
PRIVACY POLICY

Version 1.0 – 2026

Effective Date: September 16th, 2026.

IMPORTANT NOTICE

This Privacy Policy ("Policy") governs the collection, processing, use, storage, and transfer of personal data by Suno Investments S.A. ("Suno Finance", "we", "our", or "us") in connection with the Suno Platform and its associated services. By accessing or using our Services, you acknowledge and agree to the practices described in this Policy. This Policy has been designed to comply with Panama's Law No. 81 of 26 March 2019 and Bermuda's Personal Information Protection Act 2016, and incorporates internationally recognised data protection principles. This Policy does not constitute legal advice. Users are encouraged to seek independent counsel regarding their individual data protection rights.

1. Introduction

Suno Finance is committed to protecting the privacy and personal data of all individuals who interact with the Suno Platform. This Policy sets out how we collect, use, store, and share personal data when you access our websites, applications, and services (collectively, the "Services").

The Services are operated by Suno Investments S.A., a company incorporated under the laws of the Republic of Panama (RUC 155785685-2-2026), with registered address at Hanono Missri Street – San Francisco – Panama City, Oceania Business Plaza – Torre 1000 (K11). Tokens available on the Platform are legally issued under a Bermuda-based legal structure through an authorised segregated account arrangement.

By accessing or using the Services, you confirm that you have read, understood, and agree to be bound by this Policy. If you do not agree with any part of this Policy, please discontinue use of the Services immediately.

2. Scope and Applicability

2.1 Intended Audience

The Services are intended exclusively for individuals and legal entities that meet the eligibility criteria set out in the General Terms and Conditions of Suno Finance. In particular:

- **Restricted Jurisdictions:** The Services are not available to persons located in, resident in, or incorporated in any Restricted Jurisdiction as defined in the General Terms and Conditions, including persons who are citizens or residents of the United States of America.
- **Minors:** The Services are strictly intended for individuals aged eighteen (18) years or older. We do not knowingly collect personal data from persons under eighteen (18) years of age. If we become aware that personal data of a minor has been inadvertently received, we will promptly delete such data and take measures to prevent further collection.
- **Eligible Users:** Only Users who have completed all required onboarding and identity verification procedures are eligible to participate fully in the Platform functionalities.

2.2 Products and Services Covered

This Policy applies to personal data collected in connection with all Suno Finance services, including:

- **pWatt Tokens:** Project-specific funding Tokens linked to a particular renewable energy project (EGP), the cash flows of which are directed to the Reserve upon the EGP Revenue Commencement Date.
- **uWatt Tokens:** Reserve-based digital tokens providing economic exposure to the aggregate yield generated by the Suno Reserve pool.
- **Platform Services:** Onboarding, identity verification, distribution, and monitoring services available through the Suno Platform.
- **Informational and Marketing Sites:** Websites and documentation pages operated by Suno Finance.

2.3 Data Collection Channels

We collect personal data through the following channels:

- **Suno Finance Website:** Personal data collected through our official website at https://suno.finance/

- **Customer Service Channels:** Data provided when you contact us through WhatsApp, email (admin@suno.finance), or other official support channels.
- **Suno App and Virtual Platforms:** Data collected through **Suno App** and any other virtual platforms or interfaces operated by Suno Finance, including data generated through onboarding flows and interactive features.

2.4 Roles and Responsibilities

For the purposes of this Policy and in accordance with applicable data protection law:

- **Suno Investments S.A. ("Suno Finance")** acts as data controller in respect of personal data collected through the Platform for operational, contractual, and service delivery purposes, including onboarding data, account data, usage data, and communications data.
- **Authorized Third-Party Service Providers:** Suno may engage authorized third-party providers to conduct identity verification, know-your-customer (KYC) procedures, anti-money-laundering (AML) checks, and ongoing compliance monitoring. Such providers act as independent controllers or processors, as applicable under relevant law, in respect of the personal data they process within their own programmes.
- **Infrastructure and Technology Providers:** Suno engages infrastructure providers, authentication services, hosting providers, and analytics tools to operate the Services, as further described in Section 6.

3. Personal Data We Collect

We collect only the personal data necessary to operate the Services securely, comply with legal obligations, and deliver the Platform experiences described in this Policy. The categories of personal data we collect are as follows:

3.1 Onboarding and Account Data

When you register on the Platform or complete the onboarding process, Suno processes the following data:

- Full legal name
- Date and place of birth
- Nationality
- Residential address and proof of address
- Government-issued identification document
- Email address
- Blockchain wallet address(es) linked to the Platform account
- Authentication metadata (for example, login timestamps and one-time code delivery records)
- For legal entities: legal name, registered address, incorporation number, articles of incorporation, and details of statutory representatives and beneficial owners

3.2 Identification and Verification Data

As part of the identity verification process, the following categories of data may be collected and processed — either directly by Suno or through authorized third-party verification providers engaged for this purpose:

- Full legal name and date of birth
- Government-issued photographic identification (for example, a passport or driver's licence)

- Proof of address, where required
- Biometric verification data (for example, liveness checks or facial recognition captures conducted through the verification flow)
- Sanctions and Politically Exposed Persons (PEP) screening data and outcomes

3.3 Technical and Usage Data

When you interact with our Services, the following data may be collected automatically:

- IP address and approximate geolocation data derived from IP address
- Device type, operating system, and browser information
- Interaction logs, including timestamps, pages or screens visited, and feature usage
- Session identifiers and access credentials

In addition, we use performance and error monitoring tools to maintain the stability and reliability of the Platform. During an active user session, this tool may collect:

- User session identifiers and email address, linked to error reports and session recordings for the purpose of diagnosing technical issues
- IP addresses and network request metadata
- Session replay recordings — a percentage of active sessions in the production environment may be recorded for performance review; sessions in which a technical error occurs are recorded in full for diagnostic purposes
- Structured activity logs (breadcrumbs) capturing the sequence of user actions immediately preceding a technical error, including transactional flows such as purchases, registrations, and login events

Upon logout, all identifying user context is immediately cleared from our monitoring systems. Screenshot captures for debugging purposes are used exclusively in non-production (development) environments and are not applied in production.

3.4 On-Chain and Public Blockchain Data

On-chain records, including whitelist status and blockchain transaction history, are recorded on public blockchains. Such information is publicly observable and is not under Suno's exclusive control. Suno cannot delete or modify public blockchain records.

3.5 Communications Data

When you contact us through any customer service channel — including WhatsApp, email, or other official support channels — we collect the content of your communications, your contact details, and any information you voluntarily provide in the course of the interaction.

3.6 Optional Marketing Data

If you opt in to receive marketing communications, we may collect your email address and communication preferences for that purpose.

4. Purposes and Legal Bases for Processing

We process personal data (according to the following actions: collection, recording, organization, structuring, adaptation or alteration, retrieval, consultation, use, transmission by communication or any other controlled form of making available, alignment, restriction, erasure or destruction) only for specific, limited, and lawful purposes. We are guided by internationally recognised data protection

principles, which inform our approach to transparency, fairness, and data security across all jurisdictions in which we operate.

Purpose	Description	Legal Basis
Platform Operation and Contractual Performance	Account creation, onboarding, identity verification, distribution of yields, and provision of Platform services.	Performance of contract; pre-contractual steps
Regulatory Compliance and KYC/AML	Identity verification, sanctions screening, and ongoing compliance monitoring, conducted directly or through authorized third-party providers.	Legal obligation; legitimate interests in platform security and compliance
Security, Fraud Prevention, and System Integrity	Security monitoring, abuse prevention, investigation of suspicious activity, and maintenance of system integrity.	Legitimate interests
Marketing and Communications	Optional newsletters, promotional updates, and service communications.	Consent (withdrawable at any time)
Legal Proceedings and Dispute Resolution	Compliance with court orders, legal proceedings, and regulatory inquiries.	Legal obligation; legitimate interests

5. Data Storage, Transfers, and Retention

5.1 Data Locations and Cross-Border Transfers

Personal data may be processed in, and transferred to, jurisdictions where we and our service providers operate. These include:

- **Panama:** Suno Investments S.A. as data controller for Platform and operational data.
- **Infrastructure Provider Jurisdictions:** Hosting, authentication, email delivery, and analytics providers operating in various jurisdictions.
- **Verification Provider Jurisdictions:** Where Suno engages third-party providers for identity verification and compliance monitoring, personal data may be processed in the jurisdictions where those providers and their subcontractors operate.

Where personal data is transferred to jurisdictions that may not provide an equivalent level of data protection, we implement appropriate safeguards, including contractual protections substantially equivalent to recognised data transfer mechanisms, supplemented by technical and organisational measures including encryption in transit and at rest, access controls, and data minimisation practices.

5.2 Retention Periods

Personal data is retained only for as long as necessary to fulfil the purposes set out in this Policy or as required by applicable law:

- **Onboarding and Account Data:** Retained for the duration of the user relationship. Upon account deletion or termination, Suno will delete or anonymise this data where technically and legally feasible, subject to legally mandated retention obligations.
- **Identity Verification and KYC/AML Data:** Where processed through authorized third-party compliance providers, data may be retained by those providers for the period required by applicable anti-money-laundering and regulatory obligations. Suno does not control the independent retention schedules of those providers.
- **Technical and Usage Data:** Retained for up to twelve (12) months for security monitoring, system performance, and troubleshooting purposes, unless a longer retention period is required for investigations or legal compliance.
- **Communications Data:** Retained for as long as necessary to resolve the communication and for a reasonable period thereafter.
- **Marketing Data:** Retained until you unsubscribe or withdraw your consent to receive communications.

5.3 Data Requests and Withdrawal of Consent

Users may manage their personal data through their Platform account or by contacting us at admin@suno.finance.

- **Marketing and Communications:** You may unsubscribe from marketing communications or withdraw your consent to receive them at any time, without affecting your ability to use the Platform. Withdrawal does not affect any processing already carried out on the basis of prior consent.
- **Account Data Requests:** To request deletion, correction, or access to personal data held by Suno, please contact admin@suno.finance with a description of your request. We will process your request in accordance with applicable law.
- **On-Chain Data:** Blockchain transaction records, whitelist status, and other data recorded on public blockchains cannot be deleted or modified by Suno, as they exist outside our exclusive control.
- **Compliance Data:** Data processed for regulatory compliance purposes may be subject to mandatory retention obligations that take precedence over deletion requests.

6. How We Share Your Personal Data

We share personal data only as strictly necessary for the operation of the Services and in compliance with applicable law. We do not sell your personal data to third parties.

6.1 Infrastructure and Service Providers

Suno engages service providers that process limited personal data on Suno's behalf to operate the Platform. These may include authentication and database hosting providers, email delivery services, wallet connectivity providers, application hosting providers, and performance and analytics tools. All providers are bound by appropriate confidentiality and data processing obligations. A current list of key service providers is available upon request at admin@suno.finance.

6.2 Verification and Compliance Providers

Where Suno engages authorized third-party providers for identity verification, KYC/AML compliance, and ongoing monitoring, those providers process relevant personal data as independent controllers or

processors under applicable law. Suno receives verification outcomes and access determinations from such providers solely as needed to manage Platform access and regulatory obligations.

6.3 Legal and Regulatory Authorities

We may disclose your personal data to law enforcement agencies, regulators, or other public authorities where required by a valid legal obligation, court order, subpoena, or regulatory request. We may also share data where necessary to prevent or investigate suspected fraud, unlawful activity, or breaches of our Terms and Conditions or this Policy.

6.4 Corporate Transactions

In the event of a merger, acquisition, corporate restructuring, or sale of all or part of our assets, your personal data may be transferred to a successor entity, provided that such successor agrees to abide by privacy practices substantially equivalent to those described in this Policy.

6.5 Aggregated or De-Identified Data

We may share aggregated or de-identified data — which does not identify any individual user — with third parties for research, analytical, or business improvement purposes.

7. Cookies and Tracking Technologies

We may implement cookies and similar tracking technologies — including local storage, session storage, pixels, and device identifiers — in connection with the Services, now or in the future. This Section describes how those technologies work and how we would use them, so that you are informed before any implementation.

7.1 What Are Cookies?

Cookies are small text files placed on your device by your browser. Similar technologies such as local storage and session storage perform comparable functions. Some cookies exist only for the duration of your session ("session cookies"), while others persist after you close your browser until they expire ("persistent cookies").

7.2 How We May Use Cookies

- **Strictly Necessary / Essential:** Technologies required for the core functionality and security of the Services, including session management and fraud prevention. These are necessary for the Platform to function.
- **Analytics and Performance:** Technologies that help us understand how users interact with the Services so that we can improve performance and usability.
- **App Storage:** The Suno App and Platform may use browser local storage and session storage to store preferences and session-related data necessary for the Services to function.

We will provide notice and, where required by applicable law, obtain your consent before placing non-essential tracking technologies on your device. You will always have the option to manage your preferences.

7.3 Managing Cookies

You may manage cookies through your browser settings, including deleting existing cookies or blocking future placements. Please note that disabling strictly necessary cookies may impair the functionality of the Platform.

8. Automated Decision-Making and Profiling

We may use automated tools to assist with sanctions and PEP screening, fraud detection, and risk scoring in connection with compliance obligations, including tools used within our authorized verification providers' programmes. These tools are used to support — not replace — human review.

No decision that produces significant legal effects concerning a user is made solely by automated means without human oversight. If solely automated decision-making with material effects on users were to be introduced, we would provide notice, and a mechanism for affected users to request human review, express their view, and contest the outcome, in accordance with applicable law.

9. Your Rights and Choices

We respect your rights regarding your personal data. The following rights are available in accordance with Panama's Law No. 81 of 2019 and Bermuda's Personal Information Protection Act 2016. Availability and scope may vary by jurisdiction.

Right	Description
Right of Access	You may request confirmation of whether we process your personal data and, if so, request a copy of that data, including the categories, purposes, and recipients of processing.
Right of Rectification	You may request correction of inaccurate or incomplete personal data we hold about you.
Right of Deletion	Subject to applicable legal retention obligations, you may request deletion of personal data Suno controls. Deletion does not extend to data processed for mandatory compliance purposes or records on public blockchains.
Right to Withdraw Consent	You may withdraw consent given for processing (for example, for marketing communications) at any time. Withdrawal does not affect the lawfulness of prior processing and does not affect your ability to use the Platform for Services that do not rely on consent.
Right of Opposition	You may object to processing carried out on the basis of legitimate interests. Where processing is strictly necessary for the performance of the contract or the provision of the Service, exercising this right may result in the inability to continue accessing the Platform, as the processing is a condition of service delivery.

9.1 How to Exercise Your Rights

You may exercise your rights through your Platform account where applicable features are available, or by contacting us at admin@suno.finance with a description of your request. Depending on the nature of the request, we may ask you to provide additional information to verify your identity. We aim to respond to all valid requests within thirty (30) calendar days. Where a request relates to data processed by an independent third-party provider, we will inform you of the relevant controller and coordinate where appropriate.

10. Security Measures

10.1 Technical Safeguards

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, or destruction. These include:

- Industry-standard encryption protocols for data in transit
- Encryption of data at rest for sensitive personal data categories
- Access controls, role-based permissions, and multi-factor authentication for systems containing personal data
- Regular security assessments, vulnerability scanning, and penetration testing
- Pseudonymisation and data minimisation practices where technically feasible

10.2 Organisational Measures

- Regular training for personnel on data protection principles and security practices
- Contractual data processing obligations imposed on all service providers
- Internal data governance policies governing access to and handling of personal data
- Periodic review of data protection practices and documentation

11. Incident Response and Breach Notification

11.1 Monitoring and Detection

We continuously monitor our systems for unauthorised activity, anomalous behaviour, and potential security incidents through a combination of automated monitoring tools and manual oversight.

11.2 Response and Containment

In the event of a confirmed personal data breach, we will promptly activate our incident response protocol to contain the breach, assess its scope and impact, and implement appropriate remediation measures.

11.3 Notification Procedures

If a personal data breach poses a significant risk to the rights or freedoms of affected users, we will notify affected users and the relevant supervisory authority in accordance with applicable law:

- **Panama:** Notification to the National Authority for Transparency and Access to Information (ANTAI).
- **Bermuda:** Notification to the Office of the Privacy Commissioner for Bermuda.

12. Complaints and Dispute Resolution

12.1 Internal Review

If you have any questions, concerns, or complaints regarding our data practices or this Policy, please contact us at admin@suno.finance. We are committed to addressing your concerns and will respond within thirty (30) calendar days.

12.2 Regulatory Complaints

If you believe that we have violated your data protection rights and your internal complaint has not been resolved to your satisfaction, you may file a complaint with the relevant supervisory authority:

- **Panama — ANTAI:** National Authority for Transparency and Access to Information (Autoridad Nacional de Transparencia y Acceso a la Información). Contact: https://www.antai.gob.pa/
- **Bermuda — Privacy Commissioner:** Office of the Privacy Commissioner for Bermuda. Contact: https://www.privacy.bm/

13. Changes to This Policy

We reserve the right to modify this Policy at any time to reflect changes in our data practices, product offerings, or applicable legal requirements.

- **Material Changes:** Material amendments will be communicated to you via email (where an address is registered) or by posting a notice on the Services at least five (5) calendar days prior to the effective date of the change.
- **Non-Material Changes:** Administrative, clerical, or technical updates may take effect immediately without prior notice.
- **Continued Use:** Your continued use of the Services following any amendment constitutes acceptance of the revised Policy. If you do not agree with a material change, your sole remedy is to discontinue use of the Services and Suno Finance platforms.

14. Contact Information

For any questions, requests, or concerns regarding this Privacy Policy or our data practices, please contact us:

Contact	Details
Controller	Suno Investments S.A.
Registered Address	Hanono Missri Street – San Francisco – Panama City, Oceania Business Plaza – Torre 1000 (K11), Republic of Panama
Email	admin@suno.finance
Data Protection Contact	admin@suno.finance (subject line: "Data Protection Request")

15. Final Remarks

Suno Investments S.A. is committed to processing your personal data in a lawful, fair, and transparent manner. By adhering to Panama's Law No. 81 of 26 March 2019, Bermuda's Personal Information Protection Act 2016, and the principles described in this Policy, we strive to protect the personal data of all Platform users while providing a secure, compliant, and reliable service.

We encourage you to review this Policy regularly and to contact us at admin@suno.finance with any questions or concerns. This Policy was last updated on *September 16th, 2026.* and is effective from the date of its publication on the Platform.