

PRIVACY POLICY

TransAtlantis Funding II LLC - tirescartelclaim.com

This Privacy Policy explains how TransAtlantis Funding II LLC, (“**TransAtlantis**”, “**we**”, “**us**”, “**our**”), processes personal data collected through the Website tirescartelclaim.com in connection with the TransAtlantis Tire Cartel Interest Group (the “**Project**”).

For any questions regarding this Privacy Policy, please contact us at:
tires@transatlantis.com

1. Data Controller

The controller pursuant to Art. 4(7) GDPR is:

TransAtlantis Funding II LLC, registered in the Trade and Companies Register of the State of Delaware under number 4218784, whose head office is located 251 Little Falls Drive, Wilmington, 19808 Delaware, USA.

E-mail: tires@transatlantis.com

2. Personal Data We Process

We process the following categories of personal data:

- **Identification and contact data:** name, organisation name, e-mail address, telephone number.
- **Registration data:** information submitted via our Hubspot form, including expression of interest and onboarding preferences.
- **Documentation provided voluntarily:** onboarding documents and related correspondence.
- **Technical data:** IP address, browser type, device identifiers, and cookie preferences (via CookieYes).
- **Website usage data:** form submission timestamps and interaction metrics.

3. Purpose of Processing and Legal Basis

a) Registration and project communication

Where you register through our Website, we process your data to include you in the TransAtlantis Tire Cartel Interest Group and to communicate with you about next steps, onboarding documents, and updates on the European Commission's investigation. Legal basis: Art. 6(1)(a) GDPR (consent) and Art. 6(1)(b) GDPR (pre-contractual steps).

Where we contact you because you are an existing contact of TransAtlantis in connection with other cartel damages projects, we process your data to inform you of this new development and, if you register your interest, to include you in the TransAtlantis Tire Cartel Interest Group. Legal basis: Art. 6(1)(f) GDPR (legitimate interests).

You have the right to object to this processing at any time, see Section 7 below.

b) Transfer of information to our legal partners

To enable our legal counsel, Lieff Cabraser Heimann & Bernstein, LLP (“**LCHB**”), and other advisors involved in assessing potential claims, to review your information.

Legal basis: Art. 6(1)(a) GDPR (consent).

c) Website operation and security

To ensure technical availability, security, and performance of the Website.

Legal basis: Art. 6(1)(f) GDPR (legitimate interests).

d) Cookies and analytics

Cookies are managed through CookieYes. Only strictly necessary cookies load automatically. Non-essential cookies require your consent.

Legal basis: Art. 6(1)(a) GDPR (consent).

4. Recipients of Personal Data

We may transfer personal data to the following categories of recipients:

- LCHB, acting as an independent controller for the purpose of assessing and, where appropriate, pursuing your potential claim
- External IT and website providers, including:
 - Squarespace, Inc. (hosting)
 - Hubspot, Inc. (intake form and CRM)
 - DocuSign, Inc. (electronic signature of onboarding documents)
 - CookieYes (cookie consent management)
- Professional advisors assisting TransAtlantis
- Service providers engaged for technical and administrative support

Our IT and website providers act as processors and operate under written data processing agreements in accordance with Art. 28 GDPR. LCHB acts as an independent controller and processes your data under its own professional and legal obligations.

5. International Transfers

Some recipients (notably Squarespace, Hubspot and DocuSign) are based in the United States. Where data is transferred outside the EEA/UK, we rely on:

- the adequacy decision for the EU-US Data Privacy Framework (where applicable), or
- Standard Contractual Clauses approved by the European Commission, supplemented by additional safeguards where required.

6. Retention Period

We retain personal data only for as long as necessary for the purposes described above, in particular:

- **Registration and onboarding data:** until the Project is concluded or you withdraw your interest.
- **Technical logs:** in accordance with security best practices, generally 30–90 days.
- **Consent records:** for the duration required by law.

Where legal obligations require longer retention, we comply accordingly.

7. Your Rights

Under the GDPR, you have the right to:

- access your personal data
- rectify inaccurate data
- erase data (“right to be forgotten”)
- restrict processing
- data portability
- withdraw consent at any time
- object to processing based on legitimate interests
- lodge a complaint with a supervisory authority (Art. 77 GDPR)

You may exercise your rights by contacting tires@transatlantis.com

8. Withdrawal of Consent and Right to Object

Where processing is based on your consent, you may withdraw it at any time without affecting the lawfulness of processing prior to withdrawal. Where processing is based on our legitimate interest, you may object to it at any time.

Either way, this may result in TransAtlantis being unable to include you in the Tire Cartel Interest Group.

9. Updates to This Privacy Policy

We may update this Privacy Policy from time to time. The most recent version will always be available at tirescartelclaim.com.