# Privacy Policy for NewBuild.VC

This Privacy Policy describes how NewBuild Venture Capital's ("NewBuild.VC", "NewBuild" or "we") process personal data concerning the visitors of our websites ("Websites") as well as our business partner and potential business partner contacts ("Contacts" or "you").

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise.

Please note that this Privacy Policy applies to processing of personal data carried out by us as a data controller.

### Our Contact details

Name: Newbuild Venture Capital

Mail address:

555 Bryant St, #284, Palo Alto, CA 94301, USA

E-mail address: marketing@newbuild.vc

Website: www.newbuild.vc

#### Personal Data Processed and Sources of Data

The personal data collected and processed by us can be divided into two general data categories: (i) Contact Data; and (ii) Analytics Data. Although we do not normally use Analytics Data to identify individuals, sometimes individuals can be recognized from it.

NewBuild.VC may collect and process the following Contact Data: (i) name and contact details; (ii) organization and title (iii) phone number; (iv) e-mail address; (v) correspondence; (vi) marketing opt-outs and opt-ins.

Most of the Contact Data is received directly from Contacts. In addition, personal information may be collected and updated from public registers and third parties for the purposes set out herein.

Analytics Data we gather in connection with the use of our Websites include for example the following data: (i) IP address; (ii) device and device identification number;

(iii) operating system; (iv) time of visit; (v) browser type and version; (vi) language setting.

Please note that we may use the online advertising product Twitter Tailored Audiences (Twitter Inc. 1601 S. San Francisco, California) to target you with advertising relating to our services and products. It is possible to opt-out of such targeted advertising through your Twitter profile settings.

#### Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are stored on your computer.

Cookies allows us to identify visitors of our websites and facilitate the use of our websites and to create aggregate information of our visitors. This helps us to improve our websites and better serve the Website's visitors. The cookies will not harm your device or files. We use cookies to tailor our websites and the information we provide in accordance with the individual interests of our visitors.

The Websites offer newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

From time to time, we offer user surveys and questionnaires to provide you with interesting insights, helpful tools, or to understand our visitors more accurately. These surveys may use cookies to remember who has already taken part in a survey or to provide you with accurate results.

When you submit data through a form such as those found on contact pages or comment forms cookies may be set to remember your details for future correspondence.

In order to provide you with a great experience we provide the functionality to set your preferences for how the Websites run when you use them. In order to remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences. In some special cases we also use cookies provided by trusted third parties.

You may choose to set your web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

#### Safari

#### Google Chrome

#### Internet Explorer

#### Mozilla Firefox

Please note that some parts of our websites may not function properly if use of cookies is refused.

#### Web analytics services

Our websites use Google Analytics and other web analytics services to compile Analytics Data and reports on visitor usage and to help us improve the Websites. For an overview of Google Analytics, please visit <u>Google Analytics</u>. It is possible to opt-out of Google Analytics with the following browser add-on tool: <u>Google Analytics opt-out add-on</u>.

Purposes and legitimate grounds for processing of personal data

### **Purposes**

Personal data is processed by NewBuild.VC for the following purposes:

To provide our Websites and carry out our contractual obligations

We process personal data to be able to offer the Websites and to run, maintain and develop our business and to comply with our commitments to our Contacts and their organizations. Personal data may be processed in order to carry out our contractual obligations.

For communication, marketing and newsletters

We may process personal data for the purpose of contacting Contacts as well as to market our business and send newsletters.

For quality improvement

We may process information regarding the use of the Websites and our services and to improve the quality of our websites and business.

# Legitimate grounds for processing

We process personal data to perform our contractual obligations and to comply with legal obligations. Furthermore, we process personal data to pursue our legitimate interest to run, maintain and develop our business and to create and maintain business relationships. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy and e.g. provide you with optout mechanisms from our marketing communications.

You may be requested to grant your consent for the processing of personal data. In this event, you may withdraw your consent at any time.

#### Transfer to countries outside US

NewBuild.VC stores the personal data primarily within the United States. However, we have service providers in several geographical locations. As such, we and our service providers may transfer personal data to, or access it in, jurisdictions outside the US including the European Economic Area.

We will take steps to ensure that the personal data receives an adequate level of protection in the jurisdictions in which it is processed and transferred through a series of agreements with our service providers based on the <u>Standard Contractual Clauses</u> or through other appropriate safeguards, such as the <u>Privacy Shield Framework</u>.

# Personal Data Recipients

We do not share personal data with third parties outside of NewBuild.VC's organization unless one of the following circumstances applies:

# For legal reasons

We may share personal data with third parties outside NewBuild.VC's organization if we believe that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of NewBuild.VC, our Contacts or the public in accordance with the law. When possible, we will inform Contacts about such transfer and processing.

To authorized service providers and third parties for the purposes of this Privacy Policy

We may share personal data to authorized service providers who perform services for us (including data storage and marketing). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy.

Sometimes it may be necessary to provide third parties with your personal data for the purposes set out in this Privacy Policy.

### For other legitimate reasons

If NewBuild.VC is involved in a merger, acquisition or asset sale, we may transfer personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data.

### With explicit consent

We may share personal data with third parties outside NewBuild.VC's organization when we have your explicit consent to do so.

### Storage period

NewBuild.VC does not store personal data longer than is legally permitted and necessary for the purposes of this Privacy Policy. The storage period depends on the nature of the information and the purposes of processing. The maximum storage period may therefore vary per use. Generally personal data is stored for the duration of the employment or service relationship with the Contact's organisation and for a reasonable period thereafter.

We will store personal data for no longer than is required by law or reasonably necessary for our contractual obligations and legitimate interests for example for claims handling, internal reporting, marketing and accounting purposes.

We will store Analytics Data relating to the Websites for 26 months.

#### YOUR RIGHTS

### Right to access

You have the right to access your personal data processed by us and to request a copy of your personal data.

# Right to withdraw consent

In case the processing is based on a consent, you may withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## Right to rectify

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed.

### Right to erasure

You may also ask us to erase your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data.

### Right to object

You may object to the processing of personal data on grounds relating to your particular situation if such data are processed for other purposes than purposes necessary for the performance of a contract or for compliance with a legal obligation. In case we do not have legitimate grounds to continue processing such personal data, we shall no longer process the personal data.

### Right to restriction of processing

You may request us to restrict processing of your personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data.

# Right to data portability

You have the right to receive some of your personal data that you have provided to us in a structured and commonly used format.

# How to use the rights

The above-mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above. We may request the provision of additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

# **Direct Marketing**

You have the right to prohibit us from using your personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by

contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

#### Lodging a complaint

In case you consider our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection.

# Information security

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Measures include for example, where appropriate, firewalls, secure facilities and access right systems. Should despite of the security measures, a security breach occur that is likely to have negative effects to the privacy of Contacts, we will inform the relevant Contacts as well as relevant authorities about the breach as soon as possible.