

Privacy Policy

1. Introduction

Expanse Capital SIA, a Latvian company registered at Gustava Zemgala gatve 78-1, Riga, LV-1039, Latvia, under the registration number 40203217963 ("Expanse Capital", "Company", "we", "us", "our") is committed to protecting your personal data and your right to privacy. If you have any questions or concerns about this policy, or our practices concerning your personal data, please contact us at info@expanse.vc.

Expanse Capital is committed to respecting each individual's privacy and upholding it in line with applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR).

This Privacy Policy is applicable to use of our website, related to Expanse Capital's following activities:

- a) execution of the acceleration programs;
- b) publication of information about Expanse Capital's mentors and experts;
- c) hosting events;
- d) offering membership in the Invest-Club;
- e) receiving service offer to Expanse Capital;
- f) newsletter subscriptions;
- g) direct marketing.

2. Your Privacy and Trust Matter to Us

The aim of the Privacy Policy is to inform you (the website user or data subject) as clearly and comprehensively as possible about how and why we use your personal information.

We need to process your personal data to be able to supply you with personalised offers and services and ensure safe access to them, among other purposes listed above. In this regard, we undertake appropriate measures to ensure that your personal data is safe with us at all times and is processed in line with the data protection legislation, this privacy policy and our internal data privacy compliant procedures.

3. Types of personal data that we are processing

We collect personal data via our website or other means, as follows:

- (a) **When you visit our website:** some personal data is automatically collected data, in the form cookies for ensuring the proper functioning of our website; furthermore, our website might use cookies to analyse how the website is used, including the number of visitors, how you found your way to our website and the pages you visit as well as the total time you spend on our website. Cookies are text files that are placed on your computer that allow your browser to be recognised by our website. The cookies on our website may be used by and delivered to you by us or by third-party web analytics services (such Google Analytics). The cookies collect information in an anonymous form, and we do not use this data to identify our website visitors, even if the

technologies used would make such identification possible. You may refuse to accept cookies from our website and delete existing cookies by selecting the appropriate settings on your browser. If you wish to do so, please refer to your browser's user guide to find out how to control cookies by adjusting your browser's preferences. Further information about the cookies we use, is available in our Cookies Policy.

- (b) **When you apply for Expanse Capital's acceleration programs:** your data provided in the application will be reviewed by our team. If you want to participate in our acceleration program of any kind, you as a data subject shall be prompted to fill in an application form on our website with your full name, phone number, email, your position and company's name;
- (c) **When your personal data is published on website because you became an Expanse Capital's mentor or expert:** We may display on our website your full name, photos, position and place of work and links to your profile on the social webs with your consent to promote the activities of Expanse Capital. In case we displayed your personal data, you may withdraw your consent to share your personal information and we shall delete your personal data from our website.
- (d) **When you participate in events hosted by Expanse Capital:** Personal data are collected when applying for such events on our website or when filling in registration forms or contact sheets during such events.

With your consent, we acquire personal data (full name, you position and place of work and your e-mail) from you at information seminars, conferences, discussions, business forums, etc. Expanse Capital processes personal data during your participation in events organized or participated by Expanse Capital. You are free to withdraw the consent to utilize your personal data at any time.

- (e) **When you apply for membership in our Invest-Club:** If you indicate your willingness to become our investor or an investor for our portfolio companies, with your consent, we acquire personal data (full name, your position and place of work, your e-mail and Link to your profile on Facebook or LinkedIn) from you in order to grant you access to the membership.
- (f) **When you apply to become our partner and offer your services:** you should provide us with following personal data: your full name, phone number and email). Processing takes place in this case on the basis of contract performance, as data processing legal basis.
- (g) **When you subscribe to Expanse Capital's newsletter:** You can subscribe to our newsletter to receive invitations for events and news regarding our services and firm. The information needed to provide you this service (Expanse Capital newsletter) is your full name and email address. After submitting your email address, you will receive an email from Expanse Capital prompting you to accept the registration to the Expanse Capital newsletter, which aids us in confirming that it is in fact you who consents and wishes to subscribe to the newsletter. The email address you have provided is further managed by third party applications, namely Mailchimp, please get acquainted with their privacy statements at <https://mailchimp.com/legal/privacy/> for information on their processing of your personal data.

We process your personal data only if you consent to subscribe to Expanse Capital's newsletter.

The personal data (email address) you provide is retained for as long as you consent to receiving Expanse Capital's newsletter.

If you want to unsubscribe from receiving Expanse Capital newsletter's and withdraw your consent for Expanse Capital to process your personal data, you can:

- 1) click on the appropriate link assigned for unsubscribing in Expanse Capital's newsletter email (it is situated at the end of the email); and/or
- 2) by contacting us at info@expanse.vc with the request of unsubscribing your email address from the listed subscribers of Expanse Capital newsletters.

After withdrawing your consent by way of clicking link in email, we shall automatically delete your email address from the list of subscribed persons. If your choice of unsubscribing is through contacting us by email (the second way), you shall be unsubscribed no later than 30 days from the date of your request.

- (h) **When we are sending you direct marketing materials:** we may use the information provided by you for direct marketing purposes as long as this is in line with the purpose limitation requirements and is justified by our legitimate interest. This way, we are managing our marketing activities and communicate with the data subjects for marketing purposes, such as to send invitations to seminars and events, or to send out newsletters and news relating to our services and firm. In case we have used your personal data based on our legitimate interest, you have the right to object to Expanse Capital's use of your personal data.
- (i) **When you are looking for job opportunities:** Any personal data that you submit in connection with a job application is saved separately to our recruitment system. Please see our separate Privacy Policy on job applications and employment at the following link.

The personal data shared to Expanse Capital is processed based on your consent; please note that you may withdraw consent to share your personal information and we shall delete your personal data, if so requested by you. When prompted by you to provide access to any personal data we collected, your request shall be addressed within 30 days and provide you access to your personal data in accordance with the legal requirements. We undertake to meet the same deadline, should you ask us to delete your personal data.

4. Legal basis and purposes for processing personal data

As a consultancy firm, we provide services to our clients and have designed our data processing activities around this purpose. That includes the use of personal data to develop services and manage our business relationship with our clients and collaborators. Each time we provide services and manage client assignments as well as the business relationships we have with clients, we act as a data controller. The processing of personal data is necessary for the above-mentioned purposes and grounded on consent, contract performance, compliance with legal obligations or legitimate interest basis for carrying out our data processing activities.

5. Personal data storage place

Personal data is processed on servers located primarily within the EU/EEA. However, sometimes we may need to transfer your personal data from a location within the EU/EEA to a third country subject to us implementing appropriate safeguards under the GDPR to ensure that your personal data remains protected and secure. Such international transfers of personal data will be based on the standard contractual clauses approved by the European Commission or other available legal instruments. To learn more about the appropriate safeguards we use, please contact our GDPR team at info@expanse.vc.

6. Transfer or disclosure to third parties

We will not disclose personal data to any third parties, unless we are required to do so under applicable laws or for ensuring smooth operation of our business. We transfer personal data to partners and service providers in connection with the business activities that require the processing of personal data, provided that these partners and third-party service providers comply with our data processing agreements, and they implement appropriate technical and organisational measures to ensure the protection of your personal data. Furthermore, they are prohibited to process any personal data transferred to them for purposes other than providing services to us.

At the level of our Company, our employees will access your personal data subject to confidentiality obligations and on a need-to-know basis.

7. Retention periods

We retain personal data depending on the concerned personal data and processing purposes. In this regard, we retain personal data during the time needed to carry out the processing purposes mentioned above, such as in order to perform contractual or statutory obligations or manage the business relationship with you, as the data subject or entity represented by a data subject, and to the extent the data subject does not withdraw his or her consent or objects to the processing of their personal data for direct marketing purposes.

The retention periods are determined in accordance with the following criteria:

- for as long as our legitimate interest can reasonably be considered valid; the validity of the legitimate interest is determined by, for example, ensuring communications between us and the data subject or protecting our legal rights.
- for the entire duration of the contract concluded with the data subject or with an organisation represented by the data subject.

When your personal data is no longer needed, it will be destroyed in a secure way or irrevocably anonymised.

8. Data subject rights

You as data subject have the following rights regarding how Expanse Capital handles your personal data:

- right to access by the data subject, which includes among others the right to obtain the confirmation whether or not your personal data is being processed and about the purposes, categories of personal data, the recipients or categories of recipients of your personal data or to be informed of the appropriate safeguards under which personal data is transferred outside of the EU;
- right to object in case personal data is processed for the legitimate interests of Expanse Capital, including for direct marketing purposes;
- to withdraw your consent at any time, when we process your personal data based on consent;
- to request erasure of your personal data without delay, in the cases provided by law;
- to obtain the rectification of inaccurate personal data or to complete incomplete personal data;
- To ask from Expanse Capital for a copy of the safeguards under which personal data is transferred outside of the EU;

- to complain before the relevant data protection authority;

9. Contact Expanse Capital

In case of queries in relation to this Privacy Policy or any document created or distributed by Expanse Capital referencing privacy related topics please contact info@expanse.vc.

There is no fee for facilitating a request unless it is manifestly unfounded or excessive, in which case administrative costs can be recovered. This shall be determined on a case-by-case basis.

Requests that are manifestly unfounded or excessive can be refused. If Expanse Capital was to refuse such a request, it shall provide a reasoning for such denial, within one month of receiving such a request, in the same format as the request was communicated to Expanse Capital, unless this format is of a redundant nature such as telefax or unless otherwise requested by the data subject, in which case Expanse Capital shall communicate with the data subject in a commonly used electronic form or another requested method.

We will respond to request within 30 days from receipt, which shall be displayed through an email from info@expanse.vc, signifying that we have received and are processing your request. Nevertheless, should the response period be exhausted with no response being communicated to the data subject, then we shall inform him or her, in brief, of the reasons for delay and reply on the request of the data subject after two further months where necessary, taking into account the complexity and number of the requests and with informing the data subject of any such extension.

10. Updates

This Privacy Policy was updated on 16.08.2023. We reserve the right to update and amend this Privacy Policy. Unless otherwise provided in mandatory applicable legislation, we may not personally notify the data subjects of any changes we make to this Privacy Policy. We kindly ask that you review this Privacy Policy from time to time for possible changes.