

# Privacy Policy

Launch Laboratory S.a.r.L. ('Laboratory') takes your privacy seriously, handling and protecting personal data with the utmost care. Laboratory processes your personal data only in accordance with the General Data Protection Regulation ('GDPR'). This Privacy Policy regulates the processing and use of personal data by Laboratory

## **Collecting and Processing Data**

In the context of its services Laboratory, as the data controller, processes your personal data when you register as a User, Investee or Investor, enter into an agreement with Laboratory, subscribe to Laboratory's newsletters or use the website [www.dao.vc](http://www.dao.vc) (the 'Site').

We process Personal Data in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data ("General Data Protection Regulation" or "GDPR"). This Privacy Terms explains how Personal Data is obtained, stored and used, when you visit our Site. As the processing of Personal Data depends on how you interact with our services, not all parts of this Privacy Terms may apply to you.

Laboratory processes data to act on your request to be accepted as a User, Investee or Investor, to supply the contractually agreed services, to send you newsletters to keep you updated about developments and new services, to improve the use of the Site and to comply with its legal obligations. For these purposes Laboratory processes the following data: Names and addresses, telephone and banking details and employer. These data are then kept in secured records.

Laboratory processes your personal data only in accordance with the purposes described in this Privacy Policy, making every effort to protect your personal data, for instance by taking measures regarding information security, data minimisation, transparency and user checks.

Once you have registered as a User, Investee or Investor, we can inform you of related products and/or services by means of emails. All emails that we send you about direct marketing activities will contain a link to unsubscribe.

## **Sharing and Disclosing Information**

Laboratory will not sell, lease or otherwise make available your personal data to anyone without your explicit prior consent, unless necessary to comply with a legal obligation or to perform an agreement between you and Laboratory. For instance, the contact and banking details of Investors may be passed to Entrepreneur Investees who wish to attract investments.

Via a personal account hosted by third parties (like Twitter, Facebook or Google) you can gain access to the Laboratory Dashboard. If you choose to access the Laboratory Dashboard via a personal account you authorize Laboratory to grant access to the Dashboard by means of Open Authorization (oAuth). Laboratory will not share passwords or account names with third parties. Only with your explicit consent will Laboratory grant access to the Laboratory Dashboard or share other information on the Laboratory Dashboard.

Laboratory will provide personal data to enforcement authorities or anti-fraud organisations if necessary to comply with legal obligations.

## **Website Use and Cookie Policy**

Cookies are small pieces of information that are stored in your computer's browser directory. Besides cookies that are necessary for technical reasons, Laboratory only uses cookies that enable Laboratory to collect information on the use of the website and customize your use (for instance by remembering your settings).

Laboratory also uses cookies from Google Analytics, Facebook and Twitter. Those cookies are used (whether or not anonymously) to monitor the use of the Site and to check whether you are logged into your personal account on social network sites. Cookies of these social network sites are used only with your prior consent.

We inform you at the first use of the Site, that by using the Site you agree to the aforementioned use of cookies. For the record we point out to you that you can adjust your browser settings to block cookies. However, you should be aware that this might affect the functionality and usability of the Site.

## **To whom we disclose your Personal Data:**

In connection with one or more of the purposes outlined in the "How we process the Personal Data" section above, we may disclose details about you to:

- ventures that are listed on our platform and with whom the user wishes to engage;
- third parties that provide services to us (our service providers/Processors);
- competent authorities and
- other third parties that reasonably require access to personal information relating to you for one or more of the purposes outlined in the “How do we process Personal Data?” section above.

## **Third parties:**

### **1. FACEBOOK (VISITOR ACTION PIXEL)**

We use the “visitor action pixels” from Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“Facebook”) on our website.

This allows user behavior to be tracked after they have been redirected to our website by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The Personal Data collected in this way is anonymous to us, i.e. we do not see the Personal Data of individual users. However, this data is stored and processed by Facebook, which is why we are informing you, based on our knowledge of the situation. Facebook may link this information to your Facebook account and also use it for its own promotional purposes, in accordance with Facebook’s Data Usage Policy <https://www.facebook.com/about/privacy/>.

You can allow Facebook and its partners to place ads on and off Facebook. A cookie may also be stored on your computer for these purposes.

The legal basis for the use of this service is Art. 6 paragraph 1 sentence 1 letter (f) of the General Data Protection Regulation. You can object to the collection of your Personal Data by Facebook pixel, or to the use of your Personal Data for the purpose of displaying Facebook ads by contacting the following address: <https://www.facebook.com/settings?tab=ads>.

Facebook is certified under the EU – US Privacy Shield Framework and thus guarantees compliance with European Data Protection legislation. (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

### **INFORMATION ABOUT OUR FACEBOOK/INSTAGRAM PAGE**

When you visit our Pages, which we use to represent our company, some of your Personal Data will be processed. The joint Controller responsible for the processing of Personal Data is Facebook Ireland Ltd (4 Grand Canal Square, Grand Canal Harbour,

Dublin 2 Ireland, “Facebook”). Further information about the processing of Personal Data by Facebook can be found at <https://www.facebook.com/privacy/explanation>.

### Processing of Page Insights

We receive anonymized statistics and insights for our Facebook/Instagram page, which help us to understand the types of actions that people take on our Page (so-called “Page Insights”). These Page Insights are created based on specific information about individuals who have visited our Page. This processing of Personal Data is carried out by Facebook and by us as joint Controllers. The processing serves our legitimate interest to evaluate the types of actions being taken on our Page and to improve our Page based on these findings. The legal basis for this processing is Article 6 paragraph 1 letter (f) of the General Data Protection Regulation. We are in no case able to assign the information obtained via Page Insights to a specific Facebook profile using the “Like” data for our Page.

Details about the processing of Personal Data for creating Page Insights can be found at:

[https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)

<https://help.instagram.com/155833707900388>

## **2. GOOGLE ANALYTICS**

We use the Google Analytics service from Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland; “Google”) to analyze our website visitors. Google uses cookies. The information generated by the cookie about the use of the online product or service by users is generally transferred to a Google server in the USA and stored there. Google will use this information on our behalf to evaluate the use of our online products and services by users, to compile reports on the activities within these online products and services and to provide us with further services associated with the use of these online products and services and the use of the internet. Pseudonymous user profiles can be created from the processed data.

You can read more about Google Analytics in our Cookie Policy.

Please note that some of the recipients of your Personal Data referenced above may be based in countries outside of the European Union whose laws may not provide the same level of data protection. In such cases, we will ensure that there are adequate safeguards in place to protect your personal information that comply with our legal obligations. The adequate safeguard might be a Data processing agreement with the recipient based on EU Standard Contractual Clauses approved by the European

Commission for transfers of personal information to third countries. Please contact us for further details of the transfers described above and the adequate safeguards used in respect of such transfers.

We may also need to disclose your Personal Data if required to do so by law, by a regulator or during legal proceedings.

We may share non-personal, de-identified and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional purposes.

### **3. Links to other websites**

Our Site may host various blogs, forums, wikis and other social media applications that allow you to share content with other users (collectively “Social Media Applications”). Importantly, any Personal Data that you share these Social Media Applications can be read, collected and used by other users of the application. We have little or no control over these other users and, therefore, we cannot guarantee that any Personal Data that you share to any Social Media Applications will be handled in accordance with this Privacy Terms.

Our Site may contain links to other providers/social media platforms, to which this Privacy Terms statement does not extend. When you leave our Site, please be aware of and read the Privacy Terms of each and every website that collects your Personal Data. We are not responsible for third-party sites or services to which links or access are provided through our website.

If you are using the functionalities of social media plug-ins, such as the ones provided by:

Facebook Inc. (1 Hacker Way, Menlo Park, California 94025, USA);

Twitter (1355 Market street, San Francisco, California, 94103, USA);

LinkedIn (605 W Maude Ave, Sunnyvale, California, 94085, USA);

They may store your IP address, and if you are logged in your Facebook/Twitter/LinkedIn account while visiting our Site, both information will be linked by them. The plug-in will create a direct link between your browser and the

Facebook/Twitter/LinkedIn servers. We have no influence regarding the nature and the amount of data, which the plug-in will transmit to Facebook/Twitter/LinkedIn servers.

Further information is available at:

- Facebook: <https://www.facebook.com/privacy/explanation>
- Twitter: <https://help.twitter.com/en/safety-and-security#ads-and-data-privacy>
- LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931?lang=en>
- Instagram: <https://help.instagram.com/155833707900388>
- Medium: <https://medium.com/policy/medium-privacy-policy-f03bf92035c9>
- YouTube: <https://policies.google.com/privacy?hl=en-US>

## **Retention Period and Rights**

Laboratory will not keep your personal data longer than necessary to perform its contractual obligations towards you and to comply with statutory retention periods. Data will not be kept longer than is strictly necessary for the purposes for which they have been collected.

Any personal data that have been stored but are no longer necessary for the purpose for which they have been collected will be destroyed as soon as possible or modified such that the information can no longer be used for identifying purposes.

As a User, Entrepreneur Investee or Investor you have the rights listed below:

- Right to information: You have the right to ask Laboratory whether your personal data are processed.
- Right of access: You may check whether and if so, how your personal data are processed.
- Right to rectification: If your personal data are incorrect, you can request rectification from Laboratory.
- Right to restriction of processing: In some cases, you have the right to have the processing of your personal data temporarily restricted.
- Right to data portability: You have the right to receive a copy of the personal data that you have provided to Laboratory.
- Right of opposition: You have the right to ask Laboratory to no longer use your personal data.
- Right to be forgotten: In cases in which you have consented to the processing of your personal data, you have the right to have your personal data erased. However, this is possible only if Laboratory EU can still comply with its legal obligations, like the statutory retention periods.

- Right to object: You have the right to object to the processing of your personal data. Laboratory will honour your request unless it has legitimate grounds for processing.

You may always withdraw your consent to process your personal data.

To exercise your rights, you should submit a request to Laboratory, clearly describing the reason for your request. You can submit your request by e-mail to: [privacy@Laboratory.com](mailto:privacy@Laboratory.com).

Laboratory seeks to appraise whether your request is justified within four weeks from receipt. Within this term the Laboratory will let you know its decision. If your request is denied, you can object to the Laboratory, or file a complaint with the Dutch Data Protection Authority. Further to a request Laboratory may ask for more details to ascertain the identity of the data subject.

## **Changes to Privacy Policy**

Laboratory reserves the right to unilaterally make changes to the Privacy Policy. For that reason, please routinely check the Privacy Policy in order to keep yourself apprised of any changes. If Laboratory makes a substantial change to how it processes your personal data, Laboratory will warn you specifically by email, if possible, and by posting a notice prominently on the Site.

## **Security**

Laboratory protects your personal data by using safety measures that satisfy the modern relevant standards, including physical, organizational and technical measures intended to protect your personal data against loss, theft, unauthorised access, disclosure, reproduction, use or modification.

## **Questions about Privacy Policy**

Laboratory is committed to safeguarding the privacy of your personal data. Please contact us at [privacy@dao.vc](mailto:privacy@dao.vc) if you have any questions or concerns about the processing of your personal data.