

## PRIVACY POLICY

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Venrex Investment Management LLP (“Venrex”, “we”, “us”, or “our”) is committed to protecting the privacy of personally identifiable data (“personal data”) of identifiable individuals who visit [www.venrex.partners](http://www.venrex.partners) (the “Site”) and inquire about or use services associated with our business available through our Site (the “Service/s”), or express interest in our business. The privacy of your personal data is important to us at Venrex. This Privacy Policy discloses the privacy practices for Venrex and for its Site, and localized versions of that site, including the type of personal data collected and tracked, how the data is used, and with whom the data is shared.

In order to provide you with Services you may request, it is necessary for us to possess some personal data of yours. Similarly, without some of that data, we cannot inform you about the Services we have available or that you may request (though if you are currently receiving marketing communications from us, you may opt-out of receiving further communications at any time). This Privacy Policy explains our personal data policies and practices. It includes, but is not limited to, explanations of the types of personal data we may collect about you, the purposes for collecting such data, the circumstances under which we may disclose such data to third parties, the measures we take to secure the confidentiality of such data, your rights regarding your personal data, and the way to contact us to exercise those rights.

Amendments to this Privacy Policy will be posted to the Site and/or Services and will be effective when posted. Your continued use of the Services following the posting of any amendment to the Privacy Policy shall constitute your acceptance of such amendments.

## TYPES OF DATA WE COLLECT

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This section explains the personal data that may be collected when using our Services, and the other data we may receive from other sources. In this Privacy Policy, the term “personal data” refers to the types of data we may collect and use. Some examples are listed below:

- Contact details, such as your full name, e-mail address, postal address and telephone number;
- Educational, nationality and professional background data;
- Comments, feedback, posts and other content submitted to staff; and
- Interests and communication preferences including marketing permissions where appropriate.

## PURPOSES FOR COLLECTING YOUR PERSONAL DATA

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You may provide your personal data to Venrex in order to fulfill a Service. You are then entering a business relationship with Venrex and are agreeing to the use of that data by Venrex and its applicable worldwide affiliated companies, as stated in this Privacy policy. We request personal data for a variety of purposes throughout your interaction with Venrex, some of which are listed below:

- To collect data for our recruiting process;
- Contacting you or your designated representative by phone, email, or mail;

- Providing you or your representative with marketing communications;
- Sharing data about our Services including investment research;
- Fulfilling our legal and regulatory obligations;
- The performance of obligations under any applicable agreements;
- The administrative processes (and related communication) carried out between Venrex in preparing its services;
- Any other purpose that has been notified, or has been agreed, in writing.

## LAWFUL BASIS

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There is a need to process personal data for the purposes set out in this privacy policy as a matter of contractual necessity, and in the legitimate interests of Venrex to operate their respective businesses. From time to time, Venrex may need to process the personal data on other legal bases, including: to comply with a legal obligation; if it is necessary to protect the vital interests of an investor or other data subjects; or if it is necessary for a task carried out in the public interest. For the purposes listed above, Venrex is relying on performance of a contract necessity and legitimate interests.

A failure to provide the personal data requested to fulfill the purposes described in this Privacy policy may result in Venrex being unable to provide the services in connection with the terms of the subscription agreement.

## RESTRICTED USE REGARDING MINORS

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This Site is not intended or designed to be used by children under the age of 13. We do not collect personal data from any person we know to be under the age of 13 and instruct children under 13 not to send us any data.

## DATA STORAGE AND RETENTION

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Your personal data will be retained only for as long as the data is needed to fulfill the purposes for which it was collected and processed. We reserve the right to retain and use your personal data for as long as necessary to comply with our legal obligations and business requirements and/or to resolve ongoing disputes and enforce our agreements.

Recruitment-related data will be retained for 2 years if the candidate is not hired, and for up to 5 years following the end of employment with Venrex

## PROTECTION OF PERSONAL DATA

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We maintain physical, electronic, and procedural security measures that comply with applicable legal and regulatory standards to safeguard your personal data. Access to such data is restricted to those employees who are trained in the proper handling of client data and have a legitimate business need to access that data. We follow generally accepted standards to protect the personal data you submit to us, whether that data is in transit or at rest. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

## OUR SITE AND USE OF COOKIES

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Our website does not use cookies or other web browsing activity tracking technologies to track any data about your visit to our site. You can browse our site with confidence, knowing that your privacy is respected

## AUTOMATED DECISION MAKING

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We do not use automated processing, including profiling, to make decisions that will have either legal or material effects on the individuals from whom we collect and process personal data.

## SHARING YOUR PERSONAL DATA

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Your personal data may be combined with data we receive from other sources, or it may be provided to other organizations we work with. This section details that sharing of your personal data.

### Receiving personal data from Third Parties

We may receive data about you from other sources and combine that data with the personal data we collect directly from you. For example, we may receive payment data from the organization you use to pay us in order to correct our records. Additionally, to promote protection of your identity, we also may collect credit or identity data which we use to help prevent and detect fraud.

### Sharing personal data with Third Parties

We do not and will not sell your personal data. If we share your personal data with third parties performing services for us, or acting on our behalf, we will not allow them to use your data for other purposes, and we will contractually require them to protect your data.

We may share your personal data with our affiliates, business partners, and other third parties. We may do so for the purposes of operating our business, delivering and improving the Services we provide to you, as well as for other legitimate purposes permitted by applicable law such as sending marketing and other communications related to our business.

We may share your personal data with third parties for a variety of additional purposes including, but not limited to:

- Within Venrex and our affiliates and subsidiaries for data processing or storage purposes;
- With business partners and suppliers to provide Services and help facilitate transactions (including processing orders, event registrations, data storage, marketing communications and customer support); or
- In response to a request from law enforcement, government authorities, or other third parties as necessary to comply with legal process or to meet national security requirements.

## TRANSFERS OF PERSONAL DATA

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The regulations which have been put in place to protect your privacy apply throughout the EEA. As explained in the section above, we may send your data to other third parties who are based outside of the EEA, however we will only share your data with them because the following safeguards have been put in place:

- The country we send your data to is deemed to provide an adequate level of protection by the European Commission;
- The data is being transferred between organisations which are engaged in the same economic enterprise, or within our corporate group and we have an agreement in place which sets out how your privacy will be protected;
- The entities we transfer your data to are based in the US and the transfer is necessary for the performance and administration of the contact you have with us.

You can obtain further data on the specific mechanism used by us when transferring your personal data outside of the UK and EEA by emailing [dataprivacy@venrex.com](mailto:dataprivacy@venrex.com).

## YOUR DATA SUBJECT RIGHTS

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You are provided with a number of different rights under the data protection laws in relation to your personal data. These allow you:

- To access your data;
- To request we correct your data;
- To request that we erase your data;
- To object to the processing of your data;
- To request a restriction in the processing of your data;
- To request a transfer of your data;
- Complain to the Data Commissioner's Office; and
- To withdraw your consent.

## QUESTIONS OR CONCERNS AND EXERCISING YOUR DATA SUBJECT RIGHTS

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If you wish to exercise any of these rights, please contact [dataprivacy@venrex.com](mailto:dataprivacy@venrex.com). Please note that you will not have to pay a fee to access your personal data or to exercise any of the other rights. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to deal with your request. We may also need to seek further data from you to confirm your identity before we release any personal data. This does not affect your right to make a complaint.

## CHANGES TO THIS PRIVACY NOTICE

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From time to time we may update this privacy notice. If revisions are made to the privacy notice, we will update the statement with a new revision date.

This privacy notice was last revised and posted on 11 October 2024.