

Privacy Policy

Thank you for visiting our website. We hope you'll find the information relevant and useful and that you will enjoy reading about Promus Ventures.

Promus Ventures has created this Privacy Policy in line with our commitment to your privacy on Promus Ventures' website, blog, and other online communities. The following discloses our personal data gathering and protection practices and our cookies policy.

Based on our Privacy Policy we assure our users that we focus on providing clear, transparent, relevant, and complete information. All data collected and stored via our website <u>http://www.promusventures.com/</u> is secure.

Please read this Privacy Policy to learn more about the ways in which we protect, use, and disclose your personal information. By visiting the Promus Ventures website, you agree to be bound by the terms and conditions of this Privacy Policy.

Website	www.promusventures.com
Address	Promus Ventures
	156 N Jefferson St
	Chicago, IL 60661
	USA
Contact	info@promusventures.com

Collection of personal data

Promus Ventures respects the right to privacy of individuals who visit our website and communicate with us electronically. We will collect and use your personal data according to applicable data protection laws, in particular the European Union General Data Protection Regulation (the "GDPR") and the Privacy and Electronic Communications Directive 2002/58/EC on Privacy and Electronic Communications (the "ePrivacy Directive"). We will do so in our capacity as "data controller" (i.e., we will determine the purposes and means of the processing of your personal data).

Promus Ventures does not collect any personally identifiable information about you other than details that you affirmatively choose to submit to us (such as your name, e-



mail address, job title or company name) for the purpose of accessing various downloads, such as whitepapers, case studies or for the purpose of subscribing to newsletters, etc.

Data collection through "Contact us" forms – we use the information provided in "Contact us" forms to respond to and follow up to your queries.

Data collection when applying for a position in Promus Ventures – we use the personal information that you submit to us for recruitment purposes only to evaluate your suitability for the role that you have applied for (including pre-employment screening) and as part of your employment file. If we won't work together, we will retain your details for a period of twelve months from the date that we notify you that your application has been unsuccessful / you notify us of your decision not to accept the role. Please note that in certain countries, we may be required by local laws in that country to keep your details on file for a longer period.

We may also use your personal data for various purposes, including:

- Provide you relevant content about our services, solutions, and products
- On marketing purposes, to provide you with personalized offers
- Website optimization
- Manage your participation to the online context
- Conduct customer satisfaction surveys
- Recordkeeping, statistical analysis, research purpose
- Dispute resolution
- To ensure the effective operation of our website

We also collect your IP address to help us create relevant and targeted online advertising, by means of third parties, in particular, Google Ads. We may collect the web pages that you visited, the date and time when they were viewed, as well as your interaction with the content of our website, i.e., promusventures.com. The technologies used to collect such data are called "cookies".

Following the subscriptions that visitors make on our website through the subscription module and other website forms, www.promusventures.com collects email addresses. When providing us with your email address, we may use this to send you newsletters with relevant content, while giving you the option to unsubscribe, with each newsletter. Please rest assured that the email address used by you on the website will not be shared with any third parties.

If Promus Ventures has directly obtained your email address when selling you a product or a service, Promus Ventures may use the concerned address for commercial communication related to similar products or services. Each email sent by Promus



Ventures gives you the option to refuse to obtain further marketing emails, at any time – we maintain a record of any opt-out requests that we receive.

In certain cases, we may also collect information about you whereas you don't have a direct relationship with us. This may happen for instance when one of our business partners or contacts provide us with information about you, or when your contact details are provided by third parties.

We never ask for personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex orientation, unless it is required through a legal obligation.

Legal basis for processing

We take appropriate measures to ensure that all processing of your personal information by us is lawful, depending on the purposes for which we process your information. We might process your information on the following legal bases:

- to comply with our legal and regulatory obligations (e.g., in the context of recruitment),
- to perform a contract with you or to take steps at your request before entering a contract (e.g., provide you with information regarding our products and services; assist you and answer your requests; in the context of recruitment),
- based on our legitimate interests (e.g., when responding to a contact request; in the context of recruitment when carrying out customer surveys; when processing your personal data for the purpose of website optimisation; to advertise our products or services),
- based on your explicit consent if we need to carry out further processing for purposes other than those listed above.

Information sharing

We may share your personal information within departments or with third parties for the purposes of:

- marketing and business winning purposes,
- data hosting,
- potential recruitment,
- third party provider(s) who provide services including: website hosting, support and maintenance, lead generation, or pre-employment screening,
- accountants, auditors, lawyers, or similar advisers when we ask them to provide us with professional advice,
- search warrants or court order or acting as required or permitted by applicable laws or regulations.



Transfers of personal data outside the EEA

In case of international transfers originating from the European Economic Area (EEA), where the European Commission has recognised a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.

For transfers to non-EEA countries whose level of protection has not been recognised by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g., if the transfer is necessary to perform our contract with you such as when making an international payment) or implement the necessary safeguards to ensure the protection of your personal data (in particular the standard contractual clauses approved by the European Commission).

We protect your personal data

Within Promus Ventures, the security and confidentiality of your personal data are very important, therefore we put in place all technical and operational security measures to protect your personal information for unauthorized access or use, ensuring that we can always restore information in case of data corruption, loss, or disaster recovery situation.

We don't keep your personal information for longer than is necessary

We will retain your personal data for the longer of the period required to comply with applicable laws and regulations or another period regarding our operational requirements, such as facilitating client relationship management, and responding to legal claims or regulatory requests.

Your rights in relation to your personal information:

In accordance with applicable regulations, you have the following rights:

- To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To rectify: where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To erase: you can require the deletion of your personal data, to the extent permitted by law.
- To restrict: you can request the restriction of the processing of your personal data.
- To object: you can object to the processing of your personal data, on grounds relating to your situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes.
- To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.



To data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party. In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority. The supervisory authority for Orbital Ventures is the Luxembourg CNPD (www.cnpd.public.lu).

External links

Promus Ventures website might include links to various third-party websites. Promus Ventures has no control and no responsibility for such websites, either related to their content, privacy policies, security, or reliability.

Cookies

What are cookies?

A cookie is a small text file in alphanumeric format (i.e., letters and numbers) that is stored on your terminal (web browser, computer, mobile device, etc.) by the server of our website or by a third party in the context of services used by our website. The cookie is completely "passive" (it does not contain software, viruses, or spyware and cannot access the information on the user's hard drive). The lifetime of a cookie is LIMITED. Due to cookies, the website "remembers" visitors' actions and preferences for a determined period (login, language, font size and other display preferences).

How and why do we use cookies?

We use cookies to improve the usage and functionality of our website, to better understand how our visitors use our website and to customize and improve your experience on our website, making your next visit more enjoyable.

We used various types of cookies on our website, as follows:

- 1. Essential cookies –enable you to use and seamlessly navigate across our website and use its features, such as authentication cookies. Essential cookies are the only category of cookies which do not require your consent.
- 2. Functionality cookies allow our website to remember you and provide a personal navigation experience in the future (e.g., location, website size/font changes you have made in the past). Such cookies don't track other online activities, nor gather any advertising relevant information.
- 3. Performance cookies collect information about how visitors use a website, they anonymize and aggregate data and are used to develop and track traffic patterns to improve how the website works. Such information isn't shared with any third party.



4. Targeting cookies – are used to create and deliver relevant advertisement and measure the effectiveness of advertising efforts. We use targeting cookies only for our own analytical and advertising purposes; we use third parties (e.g., Google, LinkedIn, as part of our marketing campaigns) only to gather information about our website advertisement audiences and to deliver targeted campaigns on another website. Third-party social media websites may log certain information (such as your IP address, browser type, language, or access time) if you are logged in to those social media websites as you are navigating through our website. They may also link such collected information with your profile information on that website. We do not control these third-party tracking technologies; thus, we recommend that you read the terms of use and privacy policy of such websites before using them.

How can I disable cookies?

Users can set up their browsers to reject cookies. Disabling and rejecting cookies may render certain sections or pages of the website inaccessible or difficult to visit and use. You can find more general information about cookies on third party websites such as www.allaboutcookies.org or http://www.youronlinechoices.com/.

You can delete all cookies that are already on your device by clearing the browsing history of your browser. Be aware that you may lose some saved information (e.g., site preferences).

About Google Cookies

Find out more about the cookies used by Google to store user preferences and information when viewing pages here: https://www.google.com/intl/en_ALL/help/terms_maps.html

To opt-out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout

Changes to this policy

This Privacy Policy may change from time to time. We may amend this Privacy Policy at any time by posting the amended terms on the Promus Ventures website. All amended terms shall automatically be effective immediately when initially posted on the Promus Ventures website.

Contact us

For any request or question regarding your personal data, please contact us by email at <u>info@promusventures.com</u>.

