

Privacy Policy

Effective as of January 1, 2023.

This Privacy Policy describes how Owl Ventures, LLC ("**Owl Ventures**," "**we**", "**us**" or "**our**") handles personal information that we collect through our website at <https://owlvc.com/> and any other digital properties that link to this Privacy Policy (collectively, the "**Service**"), as well as through other activities described in this Privacy Policy. You can download a printable copy of this Privacy Policy [here](#).

California residents: See our [Notice to California residents](#) for information about your personal information and privacy rights.

Individuals in the EEA/UK: See our [Notice to European users](#) for information about your personal information and data protection rights.

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data.** Your first and last name, email address, mailing addresses, professional title and company name, phone number and other contact details.
- **Company data.** Any information about you, your colleagues or your company that you share with us in relation to investments or potential investments in your company by the funds we manage, such as your and colleagues' professional and educational backgrounds.
- **Communications data.** Information in your communications with us, including when you contact us through the Service, social media, events, or otherwise.
- **Event registration data.** Information you provide when you register for or attend in-person or online events that we host or co-host.

- **Job candidacy data.** Information about your candidacy for a job at one of our portfolio companies, such as your professional and educational background.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Business contacts** who send us information about entrepreneurs or candidates for jobs with our portfolio companies.
- **Publicly available sources**, such as social media platforms and other publicly available sources.

Automatic data collection. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages you viewed, how long you spent on a page, the website you visited before browsing to the Service, navigation paths between pages, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

Cookies and similar technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users’ web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both “session cookies” that are deleted when a session ends, “persistent cookies” that remain longer, “first party” cookies that we place and “third party” cookies that our third-party business partners and service providers place.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and business operations. We may use your personal information to:

- provide, operate and improve the Service and our business;
- explore business opportunities and execute transactions, including our investments in companies and investments in the funds we manage;
- promote and host events;

- help our portfolio companies explore business opportunities and recruit and evaluate job candidates;
- provide support for the Service, and respond to your requests, questions, and feedback; and
- communicate with you about any of the above or other matters.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Marketing. We, our service providers may collect and use your personal information to send you direct marketing communications. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Cookies and similar technologies. In addition to the other uses included in this section, we may use the [Cookies and similar technologies](#) described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service.
- **Functionality.** To enhance the performance and functionality of our services.
- **Analytics.** To help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails. For example, we use Google Analytics for this purpose. You can learn more about Google Analytics and how to prevent the use of Google Analytics relating to your use of our sites here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

Affiliates. Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, and email delivery).

Event co-sponsors. Third parties that co-sponsor events with us to facilitate the promotion and operation of the events.

Portfolio companies. We may share personal information about job candidates and other business contacts with portfolio companies with whom we are collaborating to assist those companies with their business and recruiting activities.

Investors. We may share with investors and prospective investors in our funds bios and other information about the founders and key personnel of our portfolio companies.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

Business transferees. Acquirers and other relevant participants in business transactions (or negotiations of or due diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Owl Ventures or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California, the United Kingdom and the European Economic Area can find additional information about their rights below.

Opt-out of marketing communications. You may opt-out of promotional emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you opt-out of promotional emails, you may continue to receive service-related and other non-marketing emails.

Cookies. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online

services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users in the United Kingdom and the European Economic Area should read the important information provided below about transfer of personal information outside of the European Union.

Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledgment that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

If you have questions or concerns about this Privacy Policy or our practices, please contact us at:

- **Email:** info@owlvc.com
- **Mail:** 855 El Camino Real Ste 13A-354, Palo Alto, CA 94301
- **Phone:** (415) 277-0300

Notice to California residents

This notice describes our collection, use and disclosure of personal information of California residents in our capacity as a "business" under the California Consumer Privacy Act ("CCPA") and their rights with respect to their personal information. For purposes of this notice, "personal information" has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA.

Your privacy rights. As a California resident, you have the following rights under the CCPA:

- **Right to know.** You can request information about the categories of personal information that we have collected; the categories of sources from which we collected personal information; the business or commercial purpose for collecting, sharing and/or selling personal information; the categories of any personal information that we sold or disclosed for a business purpose; and the categories of any third parties with whom personal information was sold, shared or disclosed for a business purpose.
- **Right to access.** You can request a copy of certain personal information that we have collected about you.
- **Right to deletion.** You can request that we delete personal information that we collected from you.
- **Right to correction.** You can request that we correct inaccurate personal information that we have collected about you.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

Identity verification. You may submit requests to exercise your right to know, access, deletion and correction by calling 415-277-0300 or via email to info@owlvc.com. The rights described above are not absolute, and in certain cases, we may decline your request as permitted by law. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Authorized agents. We need to verify your identity to process your requests to exercise your rights to know, access, deletion, and correction, and we reserve the right to confirm your California residency. To verify your identity, we may require you to log into an online account if you have one, provide identifiers we can match against information we may have collected from you previously, confirm your request using the email or telephone account stated in the request, provide government identification, or provide a declaration under penalty of perjury, where permitted by law.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to applicable state law. If you have not provided your agent with such a power of attorney, we may ask you and/or your agent to take additional steps permitted by law to verify that your request is authorized, such as information required to verify your identity and that you have given the authorized agent permission to submit the request.

Information practices. The following describes our practices currently and during the past 12 months:

- **Sources and purposes.** We collect all categories of personal information from [the sources](#) and use them for the business/commercial [purposes](#) described above in the Privacy Policy.
- **Sales and sharing of personal information.** We do not "sell" or "share" personal information as those terms are defined in the CCPA and have no actual knowledge that we have sold or shared the personal information of California residents under 16 years of age.
- **Sensitive personal information.** We do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.
- **Retention.** The criteria for deciding how long to retain personal information is generally based on whether such period is sufficient to fulfill the purposes for which we collected it as described in this notice, including complying with our legal obligations.

- Collection and disclosure.** The chart below describes the personal information we collect by reference to the categories of personal information specified in the CCPA (Cal. Civ. Code §1798.140), and the categories of third parties to whom we disclose it. The terms in the chart refer to the categories of information and third parties described above in this Privacy Policy in more detail. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below. We may also disclose personal information to professional advisors, law enforcement and government authorities, and business transferees as described above in the [How we share your personal information](#) section of this Privacy Policy.

Statutory category/personal information we collect	Categories of third parties to whom we disclose the personal information for a business purpose
Identifiers <ul style="list-style-type: none"> Contact data Company data Job candidacy data Event registration data 	<ul style="list-style-type: none"> Affiliates Service providers Event co-sponsors Portfolio companies Investors
Identifiers (online) <ul style="list-style-type: none"> Device data 	<ul style="list-style-type: none"> Affiliates Service providers
California Customer Records (as defined in California Civil Code §1798.80) <ul style="list-style-type: none"> Contact data Company data Job candidacy data Event registration data Communications data 	<ul style="list-style-type: none"> Affiliates Service providers Event co-sponsors Portfolio companies Investors
Commercial Information <ul style="list-style-type: none"> Contact data Company data Job candidacy data Event registration data Online activity data 	<ul style="list-style-type: none"> Affiliates Service providers Event co-sponsors Portfolio companies Investors
Internet or Network Information <ul style="list-style-type: none"> Device data Online activity data 	<ul style="list-style-type: none"> Affiliates Service providers
Professional or Employment Information <ul style="list-style-type: none"> Company data Job candidacy data 	<ul style="list-style-type: none"> Affiliates Service providers Portfolio companies
Education Information <ul style="list-style-type: none"> Company data Job candidacy data 	<ul style="list-style-type: none"> Affiliates Service providers Portfolio companies
Inferences May be derived from:	<ul style="list-style-type: none"> Affiliates Service providers

<ul style="list-style-type: none"> • Contact data • Company data • Event registration data • Online activity data 	<ul style="list-style-type: none"> • Portfolio companies • Investors
<p>Protected Classification Characteristics May be included or revealed in:</p> <ul style="list-style-type: none"> • Contact data • Company data • Job candidacy data 	<ul style="list-style-type: none"> • Affiliates • Service providers • Portfolio companies • Investors

Notice to European users

The information provided in this “Notice to European users notice” section applies only to individuals in the United Kingdom, Switzerland, and the European Economic Area (hereafter collectively referred to as “Europe”).

Personal Information. References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation (i.e., the EU GDPR and the so-called ‘UK GDPR’ (as and where applicable, the “GDPR”)). Essentially, it boils down to information about an individual, from which that individual is either directly identified or can be identified. It does not include ‘anonymous data’ (i.e., information where the identity of individual has been permanently removed). The personal information that we collect from you is identified and described in greater detail in the section personal information we collect.

Controller. Owl Ventures is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation. See the [Contact Us](#) section above for contact details.

Legal bases for processing. We use your personal information only as permitted by law. The GDPR requires us to ensure we have a “legal basis” for each purpose for which we collect your personal information. We rely on the following legal bases for processing the personal information described in this Privacy Policy, as described in the table below:

- We need to perform a contract that we are about to enter into, or have entered into, with you (“**Contractual Necessity**”).
- It is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each purpose we use your personal information for is set out in the table below.
- We need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- We have your specific consent to carry out the processing for the purpose in question (“**Consent**”). Generally, we do not rely on your Consent as a legal basis for using your personal information other than in the context of direct marketing communications.

We set out below, in a table format, the legal bases we rely on in respect of the relevant purposes for which we use your personal information. For more information on these purposes and the categories of personal data involved, see the section [“How we use your personal information”](#).

<p>Processing purpose</p> <p><i>Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information”.</i></p>	<p>Category(ies) of personal information processed</p>	<p>Legal basis</p>
<ul style="list-style-type: none"> • For Service delivery and business operations <p>To manage our relationship with you, including responding to your request and/or inquiries, to provide you with access to content or information you requested, and providing you with information about the Service.</p>	<ul style="list-style-type: none"> • Contact data • Company data • Communication data • Event registration data • Other data 	<p>Processing is necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the services you access and request.</p>
<ul style="list-style-type: none"> • For research and development <p>To understand what may be of interest to you, deliver relevant website content to you, measure or understand the effectiveness of the content we serve you, and use data analytics to improve our website.</p>	<ul style="list-style-type: none"> • Contact data • Company data • Communication Data • Event registration data • Other data 	<p>We process your personal information based on our legitimate interest in improving our Services. Where required, processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the services.</p>
<ul style="list-style-type: none"> • For marketing purposes <p>To ensure that you are fully informed of the investment that we are making to continuously improve our products and services and to respond to your needs.</p>	<ul style="list-style-type: none"> • Contact data • Company data • Communication Data • Event registration data • Other data 	<p>We have a legitimate interest in promoting our operations and goals as an organization and sending marketing communications for that purpose. In circumstances or in jurisdictions where consent is required under applicable data protection laws, we rely on your consent to send marketing communications.</p>
<ul style="list-style-type: none"> • Sharing your personal information as described in this Privacy Policy <p>To disclose your personal information to third party business partners or services providers.</p>	<ul style="list-style-type: none"> • Job candidacy data • Event registration data • Company data • Contact data • Other data 	<p>We use the original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the personal information was collected.</p> <p>However, we use your consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected</p>
<ul style="list-style-type: none"> • To comply with applicable law 	<ul style="list-style-type: none"> • Any and all data types relevant in the circumstances. 	<p>Processing is necessary to comply with our legal obligations.</p>

To comply with legal obligations that apply to us, including but not limited to disclosing your personal information to courts, law enforcement or regulatory authorities.		
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Retention. We retain personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for Compliance and protection purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information, we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our services.

Your rights. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Right of access:** You can ask us to provide you with information about our processing of your personal information and give you access to your personal information.
- **Right to rectification:** If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified.

- **Right to erasure:** You can ask us to delete or remove your personal information where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law.
- **Right to restrict processing:** You can ask us to suspend the processing of your personal information if: (i) you want us to establish the data's accuracy; (ii) where our use of the data is unlawful but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to object:** Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Right to data portability:** You have the right, in certain circumstances, to ask us to provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent at any time:** Where we are relying on consent to process your personal information you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Exercising those rights. Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the personal information or where certain exemptions apply. If we decline your request, we will tell you why, subject to legal restrictions.

To exercise any of these rights, please [contact us](#) using the contact details provided above. We may request specific information from you to help us confirm your identity and process your request.

Your Right to Lodge a Complaint with your Supervisory Authority. In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members_en
- For users in the UK – the contact information for the UK data protection regulator is below:
The Information Commissioner's Office
Water Lane, Wycliffe House

Wilmslow - Cheshire SK9 5AF
Tel. +44 303 123 1113
Website: <https://ico.org.uk/make-a-complaint/>

Cross-border data transfer. We are headquartered in the United States and may use service providers that operate in other countries. Therefore, we may transfer your personal information to recipients outside of the EEA and/or the UK. Some of these recipients are located in countries in respect of which either the European Commission and/or UK Government (as and where applicable) has issued adequacy decisions, in which case, the recipient's country is recognized as providing an adequate level of data protection under UK and/or European data protection laws (as applicable) and the transfer is therefore permitted under Article 45 of the GDPR.

Some recipients of your personal information may be located in countries outside the EEA and/or the UK for which the European Commission or UK Government (as and where applicable) has not issued adequacy decisions in respect of the level of data protection in such countries ("**Restricted Country**"). For example, the United States is a Restricted Country. When we transfer your personal information to a recipient in a Restricted Country, we will either:

- enter into appropriate data transfer mechanism as approved from time-to-time by the European Commission under Article 46 of the GDPR, the UK Information Commissioner's Office or UK Government (as and where applicable), such as the Standard Contractual Clauses or the International Data Transfer Addendum (as applicable); or
- rely on other appropriate means permitted by the EU GDPR, which establish that such recipients will provide an adequate level of data protection and that appropriate technical and organizational security measures are in place to protect personal information against accidental or unlawful destruction, loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

You may ask for a copy of such appropriate specific data transfer mechanism by contacting us using the contact details above.