

## Alumna Privacy Policy

Last Revised: 2021

Alumna together with its affiliated entities is committed to protecting your privacy. This Privacy Policy describes how we collect, use and share data, and what choices you have with respect to your data. We have updated this version of our Privacy Policy to reflect changes in data protection law.

We may modify this Privacy Policy from time to time, so we encourage you to review it frequently. If we make any material changes to the Privacy Policy, we will post a notice on our website prior to such change taking effect.

### Applicability of the Privacy Policy

This Privacy Policy applies to all websites that we own and operate, including the websites located at [www.alumna.eu](http://www.alumna.eu) and all related websites, our applications and/or APIs, and online services (our “Site”), as well as our other services, offerings, and other interactions (e.g., customer service inquiries, user conferences, etc.) you may have with us (together with our Site, collectively referred to as our “Services”). If you do not agree with the data practices described in this Privacy Policy, you should not use our Services.

This Privacy Policy does not apply to any third party applications or software that integrate with the Services through our Site (“Third Party Services”), or any other third party products, services or businesses.

## Information We Collect and Receive

We collect personal information about you in the following ways:

### Information you give us

Information that you may provide through the Services or otherwise communicate with us includes:

Personal and Business Contact information, such as your first name, last name, postal address, email address, telephone number, job title, and employer name.

Profile information, such as your username and password, picture, industry, interests and preferences.

Content you post on our Site (text, images, photographs, messages, comments or any other kind of content that is not your e-mail address).

Feedback and correspondence, such as information you provide in your responses to surveys, when you participate in market research activities, report a problem with our Site, receive customer support or otherwise correspond with us.

Transaction information, such details about purchases you make through the Site, registrations you make through our Site, and billing details;

Usage information, such as information about how you use our Site and interact with us.

Marketing information, such as your preferences for receiving marketing communications and details about how you engage with them.

### Information from Social Networking Sites.

Our Site includes interfaces that allow you to connect with social networking sites (each a “SNS”). If you connect to a SNS through our Site you authorise us to access, use and store the information that you agreed the SNS could provide to us based on your settings on that SNS. We will access, use and store that information in accordance with this Notice. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account settings on the applicable SNS.

### Information we get from others.

We do not purchase data about you from other individuals or organizations.

We may combine other publicly available information, such as that provided by business networking sites and databases, information related to the organization for which you work and personal interests and skill sets, with the personal information that you provide to us through our Services.

We also may obtain information from those in the Alumna Platform network such as our event organizers, contractors, and local representatives who have agreed to a relationship with us in order to deliver our Services. This may include information about potential interest in our programs, company and individual progress, interest in local events, and attendance at other similar events.

#### Information automatically collected

We may automatically log information about you and your computer or mobile device when you access our Site. For example, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site. We collect this information about you using cookies. Please refer to the Cookies and Similar Technologies section below for more details.

#### Changes to your personal information

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us by updating your registration profile or emailing us at [info@alumna.eu](mailto:info@alumna.eu)

### Cookies and Similar Technologies

#### What are cookies?

We may collect information using “cookies.” Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Site; and (2) third party cookies, which are served by service providers on our Site, and can be used by such service providers to recognise your computer or mobile device when it visits other websites.

#### Cookies we use

Our Site uses the following types of cookies for the purposes set out below:

##### Type of cookie

##### Purpose

##### Essential Cookies

These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

##### Analytics and Performance Cookies

These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered may include the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.

We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site works. You can find out more information about Google Analytics cookies here and about how Google protects your data here. You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available here.

#### Social Media Cookies

These cookies are used when you share information using a social media sharing button or “like” button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter. The social network will record that you have done this.

#### Disabling cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

#### Pixel tags

We may also use pixel tags (which are also known as web beacons and clear GIFs) on our Site to track the actions of users on our Site. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the Site, so that we can manage our content more effectively. The information we collect using pixel tags is not linked to our users’ personal information.

#### Do Not Track Signals

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 signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>

#### How We Use Your Information To provide our Services

If you have an account with us or use our Site, we use your personal information to: operate, maintain, administer and improve our Site; manage and communicate with you regarding your account, if you have one, including by sending you service announcements, technical notices, updates, security alerts, and support and administrative messages; process and manage requests you make through our Site, including to track and administer Services you have requested; better understand your needs and interests, and personalize your experience with the Site; and provide support and maintenance for the Site and our Services.

#### To communicate with you

If you request information from us, register on our Site, or participate in our surveys, promotions or events, we may send you updates, newsletters, surveys, offers, and other promotional materials that may be targeted based on your personal information as permitted by law. We also may, from time to time, contact you about a particular offering that may be of interest to you based on publicly available information or information obtained through the Alumna network. You will have the ability to opt out of such communications.

#### To comply with law

We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

#### With your consent

We may use or share your personal information with your consent, such as when you: consent to participate in additional surveys on gender and race/ethnicity (where legally permissible), let us post your testimonials or endorsements on our Sites, instruct us to take a specific action with respect to your personal information, or opt into third party marketing communications.

#### To create aggregated or de-identified information

We may disclose or use aggregated or de-identified information for any purpose. For example, we may share aggregated or de-identified information with prospects, partners, or sponsors for business or research purposes, such as when we analyze and report on demographic trends to measure our objective of having healthy diversity ratios across our programs.

#### For compliance, fraud prevention and safety

We use your personal information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Service; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

### How We Share Your Information

Except as described in this Privacy Policy, we do not share the personal information that you provide to us with other organizations. We disclose personal information to third parties for the following purposes:

#### Partners and User Groups.

We may disclose your personal information to our partners with whom we have contracted to sponsor and deliver industry-focused Accelerator and Startup Programs, and to other users of our Services, solely for the purpose of providing our products and services, including sharing with other members of the groups for which you are registered (e.g. founders, mentors). For example, when you participate in an accelerator program, your personal information may be shared with the identified accelerator partners to organize and deliver the accelerator. Also, when you register for an event through our Services, your personal information may be shared with the event organizers and sponsors in order to communicate with you about the event.

#### Affiliates.

We may disclose your personal information to our parent company, subsidiaries, joint ventures, or other corporate affiliates for purposes consistent with this Privacy Policy.

## Service Providers.

We may employ third party companies and individuals to administer and provide the Services on our behalf (such as account creation, quality assurance testing, technical support, hosting, email delivery and database management services). These third parties may use your information only as directed by Alumna and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

## Professional advisors.

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

## Compliance with Laws and Law Enforcement; Protection and Safety.

Alumna may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Services; (d) protect our rights, privacy, safety or property, and/or that of you or others; and (e) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

## Business Transfers

We may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

## Your Choices

**Access, Update, Correct or Delete Your Information.** All account holders may review, update, correct or delete the personal information in their registration profile by logging into their account. You may also contact us at [info@alumna.eu](mailto:info@alumna.eu) to accomplish the foregoing or if you have additional requests or questions.

## Email communications.

You may opt out of newsletters and marketing-related emails by following the unsubscribe instructions on a link at the bottom of each such email, or by contacting us at [info@alumna.eu](mailto:info@alumna.eu) . You may continue to receive service-related and other non-marketing emails.

## Withdrawing consent.

If you gave us consent to use your personal information, but wish to update or delete it, please contact us at [info@alumna.eu](mailto:info@alumna.eu)

## Choosing not to share your personal information.

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services and may need to close your

account. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

#### Uninstalling our applications.

You can stop all collection of information by the Application(s) by uninstalling the Application(s). You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

#### Security

The security of your personal information important to us.

We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it. However, no security safeguards are 100% secure and we cannot guarantee the security of your information.

#### Other Sites and Services

Our Site may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third party. We do not exercise control over third party websites or services, and are not responsible for their actions. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

#### User Generated Content

We may make available on our Site, or link to, features that allow you to share information online (e.g., on message boards, in chat areas, in file uploads, through events, etc.). Please be aware that whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage or dissemination of such publicly-disclosed personal information. By posting personal information online in public forums, you may receive unsolicited messages from other parties.

#### Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make material changes to this Privacy Policy you will be notified via e-mail (if you have an account where we have your contact information) or another manner through the Services that we believe reasonably likely to reach you (which may include posting a new privacy policy on our Site – or a specific announcement on this page or on our blog).

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Site (or as otherwise indicated at the time of posting). In all cases, your continued use of our Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

#### Retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

In some circumstances, we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

#### Children's Privacy

Our Products and Services are not directed to children under the age of 13, and we do not intentionally gather personal information from visitors who are under the age of 13, without their parental or guardian's consent. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at the contact information provided above. We will delete such information from our files as soon as reasonably practicable.

#### Contact Us

If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, please contact us at [info@alumna.eu](mailto:info@alumna.eu)

#### For Users Outside of the United States: International Data Transfers and Privacy Shield

Alumna is based in the United States and EU and has affiliates and service providers in other countries. Your information, including personal information that we collect from you, may be transferred to, stored at and processed by us and our affiliates and other third parties outside the country in which you reside, including, but not limited to the United States, where data protection and privacy regulations may not offer the same level of protection as in your jurisdiction. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this Policy.

References to "personal information" in this Privacy Policy are equivalent to "personal data" governed by European Union data protection legislation. We use the following safeguards if Alumna transfers personal information originating from the European Union to other countries not deemed adequate under applicable data protection law:

#### Controller

Alumna is the controller of your personal information for purposes of European data protection legislation. See the Contact Us section above for contact details.

#### E.U.-U.S. Privacy Shield

Alumna complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Our affiliated entities as follows also adhere to the Privacy Shield principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Framework, visit <https://www.privacyshield.gov/welcome>.

We are responsible for the processing of personal data received under the Privacy Shield Framework and subsequent transfers to third parties acting as agents on our behalf. Alumna complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions. With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Alumna is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. We commit to cooperate with the EU data protection authorities and comply with advice given by such authorities with respect to any human resources data transferred from the EU in the context of the employment relationship. In

certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the Privacy Shield Principles, we commit to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Alumna at [info@alumna.eu](mailto:info@alumna.eu) .

Under certain conditions, more fully described on the Privacy Shield website, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

#### Legal bases for processing

We only use your personal information as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below.

#### Processing purpose

Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services.

- To communicate with you
- To create aggregated or de-identified information
- For compliance, fraud prevention and safety

These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

#### To comply with law

Processing is necessary to comply with our legal obligations

#### With your consent

Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at [info@alumna.eu](mailto:info@alumna.eu) .

#### 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.

#### Your Rights

European data protection laws give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

Opt-out. Stop sending you direct marketing communications. You may continue to receive service-related and other non-marketing emails.

Access. Provide you with information about our processing of your personal information and give you access to your personal information.

Correct. Update or correct inaccuracies in your personal information.

Delete. Delete your personal information.

Transfer. Transfer a machine-readable copy of your personal information to you or a third party of your choice.

Restrict. Restrict the processing of your personal information.

Object. Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You can submit these requests by email to [info@alumna.eu](mailto:info@alumna.eu) or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us at [info@alumna.eu](mailto:info@alumna.eu) or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

#### Cross-Border Data Transfer

Whenever we transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on one of the following safeguards recognized by the European Commission as providing adequate protection for personal information, where required by EU data protection legislation:

Contracts approved by the European Commission which impose data protection obligations on the parties to the transfer. For further details, see European Commission Model contracts for the transfer of personal information to third countries.

For transfers to third parties in the United States, ensuring they participate in the EU-US Privacy Shield Framework

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.