

**SpeedUp Venture Capital Group
Privacy Policy**



This privacy policy was published on October 27, 2020 and applies to all Users of the www.speedupgroup.com website (hereinafter the Site) and users of the forms posted there (newsletter sign-up). In the policy we have also described the rules for processing data in our social media (Facebook, Twitter, LinkedIn) and the data of persons submitting investment proposals or contacting us on other matters.

We reserve the right to make changes to this Policy (more)

Previous versions: privacy policy as of October 27, 2020

Effective from: 01.07.2022 r.

1. Who is the administrator of your personal data?

If you subscribe to the newsletter, the Administrator of your data is Speedup Management sp. z o. o. based in Poznań, Poland. You can contact it by writing to Św. Marcin 11/8 Street, 61-803 Poznań. You can also contact the administrator via e-mail: gdp@speedupgroup.com.

In other cases, i.e. when you browse our website www.speedupgroup.com, use our social media accounts (Facebook, Twitter, LinkedIn), contact us, including submitting investment offers, the co-administrators of your data are entities that are part of SpeedUp Venture Capital Group, based in Poznan, Poland, which jointly decide on the purposes and methods of their processing.

Co-administrators included in SpeedUp Venture Capital Group

1. Speedup Management Sp. z o. o.,
2. HUGE THING Sp. z o.o.,
3. SpeedUp Innovation Sp. z o.o. S.K.A.,
4. SpeedUp Brighe Sp. z o.o.
5. SpeedUp Bridge Alfa ASI Sp. z o.o.,
6. Seedstone SpeedUp Management Sp. z o.o. ASI S.K.A.,
7. Energy Innovation SpeedUp Management Sp. z o.o. ASI S.K.A.,
8. Investments SpeedUp Management Sp. z o.o. ASI S.K.A.,
9. HT Inwestycje Spółka Sp. z o.o.,
10. SpeedUp IQbator Sp. z o.o.,
11. LMS Sp. z o.o.,

12. Seedstone Partners Sp. z o.o.

The Co-administrators have designated a point of contact, i.e. SpeedUp Venture Capital Group, 11/8 Św. Marcin St., 61-803 Poznań, e-mail: gdp@speedupgroup.com

IMPORTANT: Despite the designation of the Point of Contact, you are entitled to exercise your rights against any of the Joint Administrators by writing to Św. Marcin 11/8 Street, 61 -803 Poznań. In such a situation, your request will be forwarded by the Joint Administrator to Speedup Management sp. z o. o., which will respond to the request.

2. Joint arrangements of the Co - administrators.

To the extent that your data is co-administered, below you will find its most relevant provisions of the agreement we have entered into:

1. Your personal data is co-administered for the purpose of: Developing the "SpeedUp Venture Capital Group" brand by creating the opportunity to provide comprehensive services at the highest possible level, using innovative solutions and with the help of staff with the appropriate skills and qualifications, including the pursuit of uniform customer service and reducing operating costs through synergy.
2. An excerpt of the provisions of the Data Co-Management Agreement relevant to you is available upon request. Here we point out that Speedup Management Sp. z o. o. is responsible for providing information on how your personal data is processed, responding to inquiries and exercising rights, data subjects.

3. What rights do you have in connection with the processing of your personal data?

In connection with the processing of your data under the terms described herein, you have the right to:

- a. access to your data, including the right to request from us a copy of the processed data,
- b. rectification of your data,
- c. erasure of your data (also known as the right to be forgotten),
- d. restriction of data processing,
- e. data portability,
- f. to object to the processing of your data on the basis of the legitimate interests of the controller,

- g. withdrawal of the given consent. However, we want to inform you that withdrawal of consent does not affect the lawfulness of data processing that was carried out before the statement of withdrawal of consent was made.

You also have the right to lodge a complaint to the supervisory authority, which in Poland is the President of the Office for Personal Data Protection.

4. For what purpose do we process your data?

- For the purpose of contacting you, responding to your offer or inquiry and conducting further correspondence regarding the offer - on the basis of your consent and in connection with activities aimed at concluding an agreement;
- in order to undertake activities aimed at concluding an investment agreement and, if we decide to do so, also for the purpose of concluding an investment agreement - on the basis of your interest in our services and the activities undertaken by you aimed at concluding an agreement;
- for the purpose of enabling a quick and efficient evaluation of your subsequent investment offers made to us, based on analyses already made on the basis of previously provided data - on the basis of our legitimate interest;
- for evidentiary purposes to secure information in case of a legal need to prove facts and to establish, assert or defend against claims - on the basis of our legitimate interest,
- for the purpose of sending commercial and marketing information to the indicated e-mail address, in the form of a Newsletter, in case you voluntarily subscribe - on the basis of your consent,

In the scope of programs organized by us, including accelerator programs, you will find information about the purpose of data processing in the regulations of such programs or in other documents with which you will get acquainted before deciding to apply.

5. To whom do we share your data?

We share your data with:

- a. Entities that are part of the SpeedUp Group, based on the Data Co-Management Agreement.
- b. Subcontractors, i.e., entities we use to process your data with whom we have entered into a Data Processing Entrustment Agreement, including: our hosting provider, our CRM software provider, entities providing IT support services to us, including: the provider of the Google Workspace enterprise application suite and email, i.e. Google LLC whose registered office is located at 1600 Amphitheatre Parkway, Mountain View, CA, 94043 USA; the provider of project management software called "ASANA" i.e. Asana Inc, whose registered office is located at 1550 Bryant Street, Suite 200, San Francisco, CA 94103.

- c. To government offices, government bodies and authorities to the extent required by law,
- d. To the owners of platforms whose social plugins we have placed on our site, i.e. Meta Platforms Inc., Twitter Inc., LinkedIn Inc., Crunchbase Inc., List Holdings, LLC.

6. Do we transfer your data outside the European Economic Area and on what basis?

Please be informed that we transfer your data outside the European Economic Area, but the solutions guarantee the level of data security required by law:

- in connection with the use of Google's suite of business services applications, including email,
- in connection with the use of project management software.

We provide adequate safeguards for your personal data through standard data protection clauses approved by the European Commission. At any time, you have the right to obtain a copy of the included standard contractual clauses.

7. For what period do we process your personal data?

For the period necessary to fulfill the purposes of processing, but no longer than until you withdraw your consent or object;

we process data obtained for the purpose of responding for the period necessary to respond/clarify the matter, or until you withdraw your consent to process the data or we determine that the data has become obsolete,

we keep the data provided to us for the purpose of concluding an investment agreement for 10 years after you decide to make an investment offer or refuse to make an investment offer - the 10-year period is the period corresponding to the cycle of the economy in which you return to us with subsequent investment offers, and having analyses of the data previously provided to us allows us to evaluate your new investment offers more quickly and efficiently.

8. Is the provision of data mandatory or voluntary?

To the extent that the processing of data takes place for the purpose of contacting you or answering your questions or for the purpose of analyzing your investment offer - the provision of data is voluntary. The consequence of not providing the data will be the inability to make contact / provide answers / analyze investment offers.

In order to conclude and perform a contract, we collect only the data without which the contract cannot be performed. Failure to provide the data necessary to conclude and perform the contract will result in our inability to conclude or perform the contract with you. This also applies to data that we must collect due to a legal obligation (e.g. invoice data).

Consent to the processing of personal data is voluntary. If you do not give the consent we ask for, then we will not take the action to which the consent applies. You can withdraw your consent at any time.

9. Changes to the Privacy Policy

We reserve the right to make changes to this Policy, which may be due to the need to adapt to changes in the law or applicable privacy standards, or to expand our offerings. Accordingly, we will inform you of any material changes to this Policy with an appropriate announcement on our websites. The message will be presented in a conspicuous manner, it will contain information about the content of the introduced changes and their consequences for your data. Each time, the date of implementation of the changes will be determined so that the announcement about them will appear sufficiently in advance to allow you to read the content of the announcement, consider the nature and impact of the changes on the processing of your data. The deadline will be adequate to the need to create sufficient time limits for you to exercise your rights under the RODO (e.g., withdrawing consent or objecting to processing).