# **Privacy Policy**

###### Effective Date: May 21, 2019

13V Inc. may use cookies, clear GIFs, tracking pixels, and other activity tracking tools on the site and through email to collect your engagement metrics, including your name and any other information, including Personal Data, related to your activity on the site. 13V Inc. may make this information available to third parties and affiliates. 13V Inc. does not expressly require that its agents or service providers use data consistently with this Privacy Policy.

### **1. Our Commitment**

At 13V Inc., our most important asset is our relationship with you. We may ask for certain personal information in order to perform our services for you, but we are committed to protecting that information and keeping you informed about how we use it. This Privacy Policy describes the treatment of information that you provide to us through your use of the site and services where this Privacy Policy is posted. It also describes the treatment of information provided by you on applications that we make available on third-party sites or platforms, if disclosed to you in connection with the use of such applications. This Privacy Policy also describes your choices with respect to how we use your information and addresses how you can access and update this information.

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### **2. Our Policy**

Welcome to the web site www.the13ventures.com (the “Site”) owned and operated by 13V Inc. Network, Inc. (hereinafter “13V Inc.,” “we,” “us,” and/or “our”). This Site has been created to provide information about our company, its affiliated entities, and its services (the “Services”) to all users of the Site or Services, including but not limited to, entrepreneurs (“Issuers”) and Accredited Investors, as defined by SEC Regulation D Rule 501 (“Investors”), who in any way use the Site or any Service provided by 13V Inc. (in each case, a “User” or “you”). This Privacy Policy sets forth 13V Inc.’s policy with respect to information, including personally identifiable information about individual Users (“Personal Data”), and other information that is collected from our Users. If you have questions or complaints regarding our privacy policy or practices, please contact us at hello@the13ventures.com.

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE ANY 13V Inc. SITE OR SERVICE. If we change our Privacy Policy, we will post those changes to this Privacy Policy, the 13V Inc. homepage, or other locations. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If we make material or significant changes to this policy, we will notify you here, by email, or by means of a notice on our homepage prior to the changes taking effect. Your continued use of our products and services after such notification will signify your acceptance of the changes to our Privacy Policy.

### **3. Types of Information We Collect**

When you interact with us through the Site or the Services, we may collect Personal Data and other non-personal information about you, as further described below.

Personal Data: Personal Data is information that identifies an individual User. We collect Personal Data from you when you provide such information to us such as when you apply to 13V Inc. to access its Services (e.g., contact information, such as your name, email address, and mailing address), when you wish to use certain Services (e.g., financial and identifying information, such as bank account numbers, your date of birth, your government-issued identification number,), and otherwise when Personal Data is required in order to use and/or participate in our Services. We also may collect your Personal Data from others, such as credit bureaus, affiliates, or other companies.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy and you agree that you will abide by our Terms of Service. If you provide Personal Data, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of 13V Inc. and the authorized third parties referred to herein, all of which may be located in the United States of America (and/or in other jurisdictions which may not protect Personal Data to the same extent as the jurisdiction of your current location).

Non-Personal, Anonymous, or Aggregated Data: Non-personal information, alone, cannot be used to identify or contact you. When you interact with 13V Inc. through the Site or Services, we receive and store certain non-personal information about you for purposes that include improving our products and services, troubleshooting bugs, providing services to you, facilitating the provision of updates, dynamically served content and product support, and communicating with you. Such information, which may be collected passively using various technologies or through other means, may include: (i) demographic information (e.g., gender, age, and zip code); and (ii) information about your computer, hardware, software, media, and mobile device, including unique device IDs or other device identifiers, incident data, Internet Protocol (“IP”) address, network Media Access Control (“MAC”) address and connection. We also may receive information from third parties in connection with marketing and demographic studies and/or other data that we use to supplement Personal Data provided directly by you.

When anonymous information is directly associated with Personal Data, such that the anonymous information can be associated with an individual User, this anonymous information is treated as Personal Data.

### **4. How We Collect Information**

We collect information you provide to us when you request products, services or information from us, interact on our sites and applications, respond to surveys, or otherwise interact with us.

In order to access additional functionality of the Site, you may be required to create an account for your use of the Service (an “Account”). You may create an Account directly via the Site or by logging into your Account with certain third party social networking sites (such as Facebook and LinkedIn) via our Service. If you decide to create an Account by logging into a social networking site via our Service, we will obtain the Personal Data you have provided to the social networking site (such as your name, profile picture, email address, and other information you make publicly available via the applicable social networking site) from the social networking account and use that information to create your Account with us. The information we obtain may depend on the privacy settings you have with the social networking site. We also collect other information that you provide as part of the Account registration and your use of the Service.

#### **Internet Log Files**

* As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. 13V Inc. may store such information itself or such information may be included in databases owned and maintained by 13V Inc. affiliates, agents, or service providers. This Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, the domain names of our visitors' ISPs, and how our Users use and interact with the Services. Also, in an ongoing effort to better understand and serve our Users, 13V Inc. often conducts research on its customer demographics, interests, and behavior based on Personal Data and other information provided to 13V Inc. by Users.
* This research may be compiled and analyzed on an aggregate and non-aggregate basis. 13V Inc. may share this data, including Personal Data, with its affiliates, agents and business partners for any lawful purpose. 13V Inc. may also disclose such User statistics in order to describe our Services to current and prospective business partners and to other third parties for lawful purposes.

#### **Cookies**

* In operating this Site, we may use a technology called “cookies.” A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. We may use cookies to collect your Personal Data. On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site's features.
* The use of cookies by our any of our service providers are not covered by this Privacy Policy, except to the extent that the cookies are delivered to you through our Site. We do not have access or control over cookies delivered to you by third-party websites. Our partners may use session ID cookies to make it easier for you to navigate our Site and use our Services.

#### **Clear GIFs and Tracking Pixels**

* Clear GIFs (including web bugs, beacons or tags) are small graphic images placed on a web page, web-based document, or in an email message. Clear GIFs are invisible to the user because they are small (only 1-by-1 pixel) and usually the same color as the background of the web page, document or email message. We use clear GIFs to collect your Personal Data. Furthermore, we use clear GIFs to capture statistical usage information for our web pages, features or other elements on a web page. We correlate this information to a User to personalize User experience and for statistical analysis of User experiences on our web pages.
* We and third parties may also use tracking pixels, which allow us to advertise more efficiently by, for example, excluding our current Users from certain promotional messages or identifying the source of a new installation.

#### **Analytic Metric Tools and Other Technology**

* 13V Inc. uses third party analytics technologies to collect information when you use our online Services. These tools and technologies use server log files, web beacons, cookies, tracking pixels and other technologies to collect and analyze certain types of information, including cookies, IP addresses (including for purposes of determining your approximate geographic location), mobile or other hardware device ID or other device identifiers, browser types, browser language, information passed from your browser (if any), referring and exit pages, and URLs, platform type, click information, information about your media, peripheral hardware, software and/or applications installed on your machine and/or device, domain names and types, landing pages, pages viewed and the order of those pages, advertising conversion rates, the date and amount of time spent on particular pages, other internet and website usage information, and the date and time of activity on our websites.
* The third party analytics companies who collect information on our Site and in the context of our Services may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

#### **Google Analytics and AdWords**

* This Site uses Google Analytics to track viewing trends and help analyze how visitors use the 13V Inc. Site. This information helps us to improve the Site and the overall User experience. Google Analytics uses cookies to collect standard internet log information and User behavior information. This Site also uses the Google AdWords remarketing service to advertise 13V Inc. and 13V Inc. Issuers on third party websites to previous visitors to the 13V Inc. Site. Google AdWords remarketing will display relevant ads tailored to you by using a cookie that helps track what parts of the Site you have viewed. Google AdWords remarketing allows us to tailor our marketing efforts to better suit your needs and display ads that are most relevant to your interests. You can set preferences for how Google advertises to you using the Google Ad Preferences page.

#### **Ad Serving Technology**

* 13V Inc.’s websites, online or mobile products or services may employ proprietary or third party ad serving technologies that use cookies, clear GIFs, web beacons, tracking pixels or other technologies to collect information as a result of ad serving through our products or services as well as to help track results. We or third parties operating the advertisement serving technology may use information such as age and gender, as well as information logged from your hardware or device to ensure that appropriate advertising is presented to you and to calculate or control the number of unique and repeat views of a given ad, and/or to deliver ads that may relate to your interests, and to measure the effectiveness of ad campaigns. We or third parties may collect data for this purpose including IP address (including for purposes of determining your approximate geographic location), device IDs, information about your software, applications and hardware, browser information (and/or information passed via your browser), hardware, machine or device make and model, advertisement(s) served, length of time an advertisement was visible, other Internet and website usage information, web pages and mobile internet sites which have been viewed by you (as well as date and time), domain type, size of the advertisement, advertisement response (if any), and angle of view. The foregoing data may be used and disclosed per this Policy and the privacy policy of the company providing the ad serving technology.
* The advertising companies who deliver ads for us may combine the information collected or obtained from 13V Inc. with other information they have independently collected from other websites and/or other online or mobile products and services relating to your web browser’s activities across their network of websites. Many of these companies collect and use information under their own privacy policies.
* For more information about the practices of other ad serving companies that may collect information based on your interaction with ads on this site, in our mobile products, and other sites or products not owned/managed by 13V Inc., or to “opt out” of targeted advertising delivered by National Advertising Initiative (NAI) member ad networks, you should visit [www.networkadvertising.org](http://www.networkadvertising.org/).
* Please refer to your mobile device or browser’s technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. Depending on your type of device, it may not be possible to delete or disable tracking mechanisms on your device. Note that disabling cookies and/or other tracking tools prevents 13V Inc. or its analytics providers from tracking your browser's activities in relation to the Service. However, doing so may disable many of the features available through the Service. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at hello@the13ventures.com. Although we do our best to honor the privacy preferences of our Users, we are not able to respond to Do Not Track signals from your browser or device at this time.

#### **Other Information Collected From Third Parties**

* 13V Inc. may also receive other information from third parties, including in connection with the operation of our products and services as well as marketing and demographic studies that we use to supplement Personal Data and anonymous information provided directly by you. Some third party services such as Twitter, Facebook, and LinkedIn may also provide us with information from your accounts there with your permission.
* 13V Inc. may also collect or receive information about you from other 13V Inc. users who choose to upload their email and other contacts. This information will be stored by us and used primarily to help you and your friends connect.

### **5. Our Use of Your Personal Data and Other Information**

13V Inc. uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to obtain access to the Services, we will use your Personal Data to provide you with access to such Services and to monitor your use of such Services. In addition, we may provide information regarding your Site activity to third parties and affiliates. We also may obtain information about you from third party sources to verify your identity so we can properly process your requests and prevent fraud. By accessing our Site and using our Services, you explicitly consent that we may use your submitted and obtained Personal Information for such purposes.

13V Inc., its subsidiaries, and its affiliates (the “Related Companies”) may also use your Personal Data and other personally non-identifiable information collected through the Site to help us improve the content and functionality of the Site, to enforce our Terms of Service, to better understand our Users, to detect, investigate and prevent activities that may violate our policies or be illegal, to personalize control and experiences on our Sites and applications, and to improve the Services. 13V Inc. and its Related Companies may use this information to communicate with you regarding the Services and, to the extent permitted by law, to tell you about services we believe will be of interest to you. If at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact hello@the13ventures.com. Note, however, that as a User of the Service, we will send you administrative communications that are reasonably necessary to provide the Service.

If you choose to refer a friend to a 13V Inc. Service, we may ask you for your friend’s name and email address. 13V Inc. retains your friend’s name and email for the sole purpose of sending this email. We do not keep or use this information for any other purpose.

### **6. Our Disclosure of Your Personal Data**

All financial companies need to share personal information to run their everyday business. In the section below, we describe the reasons that 13V Inc. chooses to share your Personal Data and whether you can limit this sharing. We only will share your Personal Data with third parties in the ways that are described in this Privacy Policy. There may also be circumstances where you may share information on your own. To opt out of further communications from a marketing partner or sponsor with your information has been shared, please contact that partner or sponsor directly.

From time to time, 13V Inc. employs third party contractors to collect Personal Data on our behalf to provide email delivery, products, promotional fulfillment, shipping or other services on our sites. When requesting these services, you may be asked to supply your name, mailing address, telephone number and email address to our contractors. We ask some third party contractors, such as data analytics or market research firms, to supplement Personal Data that you provide to us for our own marketing and demographic studies, so that we can consistently improve our Sites and related advertising to better meet our visitors’ needs and preferences. To enrich our understanding of individual customers, we tie this information to the Personal Data you provide to us.

We may also access and disclose Personal Data, including personal communications, in connection with abuse reporting functions in our products and services, to enforce legal rights and comply with the law, or to comply with an order from a government entity or other competent authority, or when we have reason to believe that a disclosure is necessary to address potential or actual injury or interference with our rights, property, operations, users or others who may be harmed or may suffer loss or damage, or when we believe that disclosure is necessary to protect our rights, combat fraud and/or comply with a judicial proceeding, court order, or legal process served on 13V Inc.. Note that certain publicly available information you post and communicate on third party sites and services is public information for which you have no expectation of privacy.

We share your Personal Data only when applicable law allows us to do so without obtaining your prior consent. Federal law only gives you the right to limit: (i) sharing Personal Data about your creditworthiness with a Related Company for the Related Company’s everyday business purposes; (ii) the ability of a Related Company to use your Personal Data to market to you; (iii) sharing for non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.

We will not share your Personal Data with a non-affiliate for its independent marketing purposes without your consent. We also will not share your Personal Information with joint marketing partners except to the extent that applicable law permits us to do so without your prior consent. Please see below for additional information about our Related Companies.

#### **Testimonials**

* We may display personal testimonials of satisfied customers on our Site, in addition to other endorsements. With your consent, we may post your testimonial along with your name and other information. If you wish to update or delete your testimonial, please contact us at hello@the13ventures.com.

#### **Public Information Including User Generated Content, Forums, Blogs, and Third Party Sites**

* Our Site may offer a publicly accessible blog. You should be aware that any information you provide in this area may be read, collected, and used by others who access them. To request removal of your Personal Data from our blog, contact us at hello@the13ventures.com. In some cases, however, we may not be able to remove your Personal Data.
* You may choose to disclose information about yourself in the course of contributing content to 13V Inc. or in our online forums, blogs, message boards for public view or in similar forums on our sites and/or on third party sites. Information that you disclose is unencrypted, public information that may be accessed or recorded by 13V Inc. employees or others, and you should have no expectation of privacy or confidentiality with respect to such information.
* You should be aware that any Personal Data you submit in the course of these public activities can be read, or collected, or used by other Users of these forums, and could be used to send you unsolicited messages. We are not responsible for the Personal Data you choose to make public in any of these forums on third party sites.
* Unsolicited information that you provide to 13V Inc. through this Site or through any other means, including (but not limited to) information posted to any public areas of the Site, such as bulletin boards, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, “Unsolicited Information”) shall be deemed to be non-confidential. 13V Inc. shall be free to reproduce, use, disclose, distribute and exploit such Unsolicited Information without limitation or attribution.
* Note also that in the ordinary course of Internet activity, certain information may be sent from your browser to third parties such as advertising networks and analytics companies. 13V Inc. has no control over the information sent from your browser to those networks or other third parties and recommends that you ensure that your browser settings prevent the disclosure of information you would not like to share.
* If you post a video, image, or photo on one of our Sites for public view, you should be aware that these may be viewed, collected, copied and/or used by other Users without your consent. We are not responsible for the videos, images, or photos that you choose to submit to any 13V Inc. sites.
* There are also certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:
  + Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.
  + Related Companies: We also may share your Personal Data with our Related Companies for purposes consistent with this Privacy Policy, but only to the extent that applicable law permits us to do so without your prior consent. Related Companies are affiliated by common ownership or control. They can be financial or non-financial companies. Our Related Companies include all of those related to Venture Box™.
  + Agents, Consultants and Related Third Parties: 13V Inc., like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases, identity verification, processing applications, shipping and fulfillment, and processing payments and completing transactions. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. These companies are authorized to use your Personal Data only as necessary to provide these services to us.
  + Joint Marketing: Joint marketing is a formal agreement between nonaffiliated financial companies that together market financial products or services to you. 13V Inc. does not jointly market.
  + Legal Requirements: 13V Inc. may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of 13V Inc., (iii) act in urgent circumstances to protect the personal safety of Users or the public against fraud or other harm, or (iv) protect against fraud or legal liability.

### **7. Your Controls and Choices**

If your Personal Data changes, or if you no longer desire our Services, you may correct, update, amend, delete or request deletion by emailing us at hello@the13ventures.com or by contacting us at the contact information listed at the bottom of this Privacy Policy. We will respond to your request within a commercially reasonable time.

When you sign up for our Services or newsletter(s), we will send periodic emails to you regarding the Services or to tell you about additional services we believe will be of interest to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, or you can contact us at hello@the13ventures.com

### **8. Data Security, Integrity and Retention**

To protect your Personal Data from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

If you enter sensitive information (such as bank account information) on our website, we encrypt the transmission of that information using transport layer security (TLS). We also may use third party identity verification to validate our Users’ identities. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware, however, that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee that your information will not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. We cannot assume responsibility or liability for unauthorized access to our servers and systems. We will retain your information for as long as our relationship with you is active or as needed to provide you with the Services, unless a longer retention period is required by law. If you wish to request that we no longer use your information, or if you have any questions about our security practices, please contact us at hello@the13ventures.com

### **9. Exclusions**

This Privacy Policy does not apply to any Personal Data collected by 13V Inc. other than Personal Data collected through the Site or Services. This Privacy Policy also does not apply to information about businesses or other non-individual Users. 13V Inc. reserves the right to use and disclose such non-Personal Data for any commercially reasonable purpose.

### **10. Children’s Privacy**

13V Inc. does not knowingly collect Personal Data from children under the age of thirteen. If you are under the age of thirteen, please do not submit any Personal Data to 13V Inc.. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data to 13V Inc. without their permission. If you have reason to believe that a child under the age of thirteen has provided Personal Data to 13V Inc., please contact us, and we will endeavor to delete that information from our databases.

### **11. Links to Other Web Sites**

This Privacy Policy applies only to the Site and the Services. This Site may contain links to other web sites not operated or controlled by 13V Inc. (the “Third Party Sites”). The policies and procedures we described here do not apply to the Third Party Sites. The fact that we link to a Website is not an endorsement, authorization or representation of our affiliation with that third party. If you click on a link to a Third Party Site, including on an advertisement, you will leave the 13V Inc. Site you are visiting and go to the Third Party Site you selected. Because we cannot control the activities of third parties, we cannot accept responsibility for any use of your Personal Data by such third parties, and we cannot guarantee that they will adhere to the same privacy and security practices as 13V Inc.. We encourage you to review the privacy policies of any other service provider from whom you request services. If you visit a Third Party Site that is linked to a 13V Inc. Site, you should consult that site’s privacy policy before providing any Personal Data.

Members may apply for other services from our Site(s). Certain products and/or services available on our Site are provided to you in partnership with third party(s) and may require you to disclose Personal Data in order to apply for and access such products and/or services. Such products and/or services shall identify the third party partners at the point of application. If you elect to apply for such products and/or services, your Personal Data will be transferred to such third party(s) and will be subject to the privacy policy and practices of such third party(s). We are not responsible for the privacy practices and policies of such third party(s) and, therefore, you should review the privacy practices and policies of such third party(s) prior to providing your Personal Data in connection with such products and/or services.

### **12. Changes to this Privacy Policy**

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

### **13. Contacting 13V Inc.**

Please feel free to contact us if you have any questions about 13V Inc.'s Privacy Policy or the information practices of this Site:

13V Inc.

446 West 14th St, 2nd Fl.

New York, NY 10014

hello@the13ventures.com