

Privacy Policy

Last revised on: 4 June 2019

Pitchdrive NV, registered with Crossroads Bank of Enterprises under company number 0703.977104 and having its registered office at Entrepotkaai 4, box 81, 2000 Antwerp and its affiliates ("**Pitchdrive**", "**we**", "**us**") collects data when you contact us and when you use our Platform (as defined below) ("**you**"). Pitchdrive recognizes and understands the importance of your privacy. All your Personal Data (as defined below) collected by Pitchdrive shall be processed in accordance with the applicable privacy legislation, more specifically, the European Regulation 2016/679 on the protection of personal data, together with the codes of practice, codes of conduct, regulatory guidance and standard clauses and other related legislation resulting from such Regulation, as amended or supplemented from time to time (the "**Privacy Legislation**"). Pitchdrive shall solely use your Personal Data for purposes mentioned in this Privacy Policy and we shall not disclose your Personal Data to any Third Parties (as defined below), unless stated otherwise in this Privacy Policy. Please read our Privacy Policy, which you can also consult on our website www.pitchdrive.com, including Pitchdrive's application whereby amongst others (i) investors and start-up are brought together based on "big data", (ii) start-ups have the opportunity to present a business case and their financial needs to a number of selected investor and (iii) investors have the opportunity to provide capital or other financial means in an efficient and straight-forward manner to selected start-ups (the "**Pitchdrive platform**") (jointly the "**Website**"), carefully. In this Privacy Policy you can find information on:

- What Personal Data we collect from you and for which purpose;
- The measures to safeguard the access to and the security of your Personal Data;
- Which Third Parties may have access to your Personal Data; and
- Your rights to access, rectify, and erase your Personal Data and object to the processing of your Personal Data.

1. General

All capitalized terms shall have the meaning as set forth in section 2 of this Privacy Policy.

2. Definitions

"**Personal Data**" means any information relating to an identified or identifiable natural person, and more specifically the information as mentioned under section 3;

"**Purpose**" shall have the meaning as set out in section 4;

"**Third Parties**" means any natural or legal person or entity other than Pitchdrive; and "**Website**" has the meaning as set forth in the preambles.

3. Personal Data we collect

We may collect several types of Personal Data, and store it on our servers such as:

- Contact information (e.g. your name, job title, qualifications, postal address, e-mail address, phone number);
- The profile data provided by you (e.g. profile picture, professional skills, date of birth, gender, social network profile and password);
- Any Personal Data that forms a part of pitches provided to Pitchdrive;
- Any Personal Data that forms a part of business cards provided to Pitchdrive;
- Any Personal Data of staff employed by Third Parties;
- Information in the framework of regulatory compliance (including compliance with all applicable laws and appropriate guarantees in respect of anti-money laundering, in particular but not limited to the 4th AML Directive).

Personal Data may be transferred to, stored and processed outside the European Economic Area. In the event the Personal Data is transferred outside the European Economic Area, appropriate measures will be taken.

4. How your Personal Data is processed – Purpose of the processing

Pitchdrive (i) collects, (ii) uses, (iii) maintains and (iv) may share the Personal Data provided by you or collected by Pitchdrive with its affiliates, parent companies or other related companies. Pitchdrive may share your Personal Data for all purposes necessary to provide its services and the use of the Pitchdrive Platform. These purposes may include (collectively the "**Purpose**");

1. (Potential) Investors

- Administering and maintenance of a record of contacts and services provided;
- Regulatory compliance (including compliance with all applicable laws and appropriate guarantees in respect of anti-money laundering, in particular but not limited to the 4th AML Directive);
- All communications regarding commitments in Pitchdrive;
- Sending promotional materials or other communications;
- Commercializing the Website;
- The operation, evaluation and improvement of the Website (including the development of additional products and/or services, enhancing and improving the current Website, analysis of our Website);
- Seeking and receiving advice from professional advisors, including accountants, lawyers and other possible consultants;
- Protecting against, identify and prevent fraud and other unlawful activity, claims and other liabilities; and
- Diagnosing technical problems and managing technical support and processing inquiries concerning the Website.

2. Founders of start-ups / target / portfolio company staff

- Investigating proposed investment opportunities;
- Contacting the investment opportunities via the contact details;
- Maintaining records of investments;
- Regulatory compliance (including compliance with all applicable laws and appropriate guarantees in respect of anti-money laundering, in particular but not limited to the 4th AML Directive);
- Administration of investments;
- Communicating about, and organizing market research or obtaining testimonials or other promotional material;
- Seeking and receiving advice from professional advisors, including accountants, lawyers and other possible consultants;
- All communications regarding management of the portfolio company; and
- Protecting against, identify and prevent fraud and other unlawful activity, claims and other liabilities.

3. Third Party staff

- Administering and maintenance of a record of contacts and services provided;
- Seeking and receiving advice from professional advisors, including accountants, lawyers and other possible consultants; and
- Protecting against, identify and prevent fraud and other unlawful activity, claims and other liabilities.

Furthermore, you agree that Pitchdrive is free to access, retain, and disclose Personal Data in the following events:

- In order to be in compliance with any applicable legislation or regulations;
- If a law enforcement authority or other government official requests so;
- To enforce the Pitchdrive terms of use or Privacy Policy;
- The investigation of any suspected or actual fraudulent or illegal activity; and
- To protect your or Pitchdrive's safety and/or rights.

5. Security

Taken into account the state of the art of the technology, the costs of its implementation and the nature of the Personal Data that is being processed, Pitchdrive shall take appropriate administrative, technical and organizational measures against unauthorized or unlawful processing of any Personal Data or its accidental loss, destruction or damage, access, disclosure or use.

In the event of and following discovery or notification of a breach of the security of the Personal Data, or access by an unauthorized person, Pitchdrive is required by law to notify you if the breach is likely to affect your privacy.

6. Disclosure to Third Parties

Other than as set out in this Privacy Policy, Pitchdrive shall not sell or otherwise disclose your

Personal Data to Third Parties without obtaining your prior explicit consent, unless this is necessary for the Purpose set out in this Privacy Policy or unless we are required to do so by law.

In the event of full or partial merger with, or acquisition of all or part of Pitchdrive, Pitchdrive may transfer your Personal Data to a Third Party. In such event, Pitchdrive shall impose this Third Party to use any Personal Data strictly consistent with this Privacy Policy.

We may also share Personal Data with Third Party cloud providers and service providers who help us to provide, understand, commercialize and improve the Website and our services. We do not authorize these Third Party service providers to use or disclose your Personal Data except as strictly necessary to perform any services under our supervision or to comply with applicable legislation. We seek to provide any such Third Party service provider with only the Personal Data they need to perform their specific function.

In any event, such Third Party service providers shall be obliged to treat your Personal Data in accordance with this Privacy Policy. However, we cannot be held liable for any damages, whether direct or indirect, that may result from the misuse of your Personal Data by such Third Party service providers.

7. Your rights as Data Subject

We want to guarantee a safe and lawful processing of Personal Data, and we assure you that your Personal Data will be processed in a straightforward and lawful way. This implies that the Personal Data will only be processed for the aforementioned, explicitly states and legal Purpose. Pitchdrive furthermore assures that the Personal Data will always be processed in an adequate, relevant and non-extensive manner.

To exercise your rights mentioned below or any other questions concerning this Privacy Policy, please contact us by e-mail at info@pitchdrive.com or by writing to Pitchdrive NV, having its registered office at Entrepotkaai 4, box 81, 2000 Antwerp, Belgium.

Right for information and access

If you are concerned or have any questions about your Personal Data, and provided you are able to prove your identity, you have the right to request information and/or access to your Personal Data, which Pitchdrive holds or processes about you. We will then provide you with information and/or access to the Personal Data that is being processed and on the source of such Personal Data.

Right of rectification and right of erasure

You have the right to request us, free of charge, to correct, erase or block any inaccuracies in your Personal Data if such Personal Data would be incomplete, inaccurate or processed unlawfully.

You have the right to request us, free of charge, to erase all your Personal Data collected, stored and processed by us, without unreasonable delay.

Right to object to data processing

You may withdraw your consent to the processing of your Personal Data by Pitchdrive at any time.

We may solely use your Personal Data to contact you through mail to suggest certain user tests that might be interesting to you and/or for direct marketing purposes in the event that you have explicitly consented hereto. If you have consented hereto in the past, and you no longer want to receive suggestions and/or direct marketing through mail, you may at any time unsubscribe.

Right to Data Portability

Within the limits set forth in the Privacy Legislation, you may request the portability of your Personal Data, i.e. by obtaining that the Personal Data you have provided to Pitchdrive will be returned to you or transferred to someone else of your choice, in a structured, commonly used and machine-readable format.

Right to file a complaint with the competent authority

If you are not satisfied with the way we process your Personal Data, please let us know and we will investigate your concern using the above communication means. You also have the right to make a complaint to the competent data protection authority with the following contact details:

Privacy Commission/ Commission de la protection de la vie privée
Rue de la Presse 35, 1000 Bruxelles
02 274 48 00 of 02 274 48 79/ Fax: 02 274 48 35
<https://www.privacycommission.be/fr>
commission@privacycommission.be

8. Data retention and deletion

We may retain information regarding you and your use of the Website, including Personal Data, for as long as reasonably needed taking into consideration (i) our need to answer queries and resolve problems, (ii) to provide you with improved and new Services and (iii) to comply with legal requirements under applicable law(s).

The retention period of your Personal Data will vary. The retention period will be determined by various criteria, including the Purpose for which we are using it and legal obligations (as applicable legislation or regulations may set a minimum period for which we have to keep your Personal Data).

We may keep your Personal Data for the Purpose under section 4, and for as long as we maintain an ongoing relationship with you.

After our relationship is terminated, we may keep your Personal Data for up to 10 years after that date in order to maintain records in accordance with applicable laws and regulations which apply to us and to respond to any regulatory requests or questions.

To the extent we are not permitted to delete your Personal Data for legal, regulatory, internal compliance and audit, or technical reasons we may keep your data for longer than 10 years. In such circumstances, we will ensure your Personal Data and privacy is protected.

9. Third Party websites or applications

You acknowledge and agree that certain content or services provided by Third Parties may be made available to you through the Website. You agree that such linked content or services may have their own privacy policies for which Pitchdrive cannot be held responsible. Pitchdrive does not in any way review or endorse the privacy practices of such Third Parties.

10. Updates or changes to our Privacy Policy

Occasionally, we may change or update this Privacy Policy to allow us to use or share your previously collected Personal Data for other purposes. If Pitchdrive would use your Personal Data in a manner materially different from that stated at the time of the collection, we will provide you with a notice on our Website indicating that the Privacy Policy has been changed or updated and request you to agree with the updated or changed Privacy Policy.

Controller:

Pitchdrive NV
Mr. Thomas Wilkinson
info@pitchdrive.com
www.pitchdrive.com