

Inventure

Privacy Policy

At Inventure we maintain contacts of a strong and competent network and we are always happy to reach out and try to help different players in the ecosystem. We believe in the "pay it forward" approach which also means that we maintain a network of contacts stored in our systems. However, "from great power comes great responsibility". Here you can read more about our privacy policy.

INTRODUCTION

When you start interacting with Inventure there will most likely be an exchange of personal information. Underneath you'll find more information on what data we collect. Depending on the point of contact with Inventure, we might also record your location (such as country and city). Our websites www.inventure.vc and www.inventureawake.com collect cookies to analyze user's behavior and help us understand what are the most valuable or helpful sections in our sites.

Our website may contain links to other websites which are outside our control and are not covered by this privacy policy. If you do visit other websites from www.inventure.vc or www.inventureawake.com domain, please refer to their privacy policy to know how they manage the data.

CONTROLLER AND CONTACT INFORMATION

Processed personal data: Onventure Oy customer and contacts register

Data controller: Onventure Oy, Lapinlahdenkatu 16, 00180 Helsinki, Finland

Contact for register related information and requests: Andrea Di Pietrantonio, [andrea\(at\)inventure.vc](mailto:andrea(at)inventure.vc)

You may find out more about processing of your personal data by contacting us via the above address.

PURPOSES AND LEGAL BASIS

Your personal data is used by Inventure Team to carry out activities related to our core business: LP communication, fundraising process, portfolio and dealflow communication as well as community initiatives. We also work with investors, entrepreneurs, industry experts and local startup community alike. For all data categories above, we take security seriously and apply industry standard security measures to ensure adequate protection of your data.

Your personal data is used for the following purposes:

- to fulfil and deliver our services;
- development of our business, including products and services;
- billing and customer relationship management and development;
- organizing events;
- advertising and marketing;
- customer communication;
- marketing; and
- compliance with applicable laws.

With regard to above purposes, we rely on the following legal bases:

- i. agreement with you (in order to fulfil our obligations and rights under that agreement)
- ii. our legitimate interests (e.g. in relation to performance of agreements, communication and marketing),
- iii. your consent; and
- iv. compliance with our statutory obligations (e.g. in relation to anti-money laundering legislation, legislation relating to alternative investment funds and financial services, and tax and corporate law, including tax reporting requirements).

WHOSE PERSONAL DATA IS COLLECTED

We process personal data about representatives of our existing clients and customers, potential ones and extended network such as portfolio companies.

The register also contains personal information about representatives of investors or of prospective investors.

CATEGORIES OF PERSONAL DATA AND RETENTION

We generally retain the following information:

- Contact information (name, email, phone number, location);
- Company and position, company address;
- Customer choices related to direct marketing

- Other information required for delivering our services and organising events (including attendance at events and reported diets).

With respect to Limited Partners and Portfolio companies and other investors we also collect information required or necessary in respect of the performance of our functions as the alternative investment fund manager of the funds that we manage, including information that is required for investor classification purposes (professional / non-professional) or to comply with tax reporting requirements or laws and regulations relating to fund management and finance sector more generally. Such information may include items such as social security numbers / dates of birth / personal identity codes / tax identification numbers, nationalities / tax residences and photos (in passports or identity documents), status as a politically exposed person (or a family member or an affiliate thereof) as applicable, ownership, bank account numbers, source(s) of funds and information of financial standing and assets, investment experience and occupational background.

Certain information that we process is classified as "sensitive data". Such information includes e.g. data about your social security number or personal identity codes. We process such information only based on our statutory obligations, e.g. pursuant to Finnish Act on Detecting and Preventing Money Laundering and Terrorist Financing (444/2017).

We will retain personal data as long as applicable according to above mentioned operations and lawful requirements (such as AML law and regulation).

SOURCES OF PERSONAL DATA

Regular sources of information: We primarily collect information from the person him-/herself or with their consent from a third party. Register also contains information from publicly available Internet sources and databases of customer information systems.

Information needed to comply with financial laws and regulations can also be collected from relevant authorities and other information providers.

TRANSFERS AND DISCLOSURES OF PERSONAL DATA

Regular disclosure of information: We may transfer your personal data to our processors acting on our behalf in order to fulfil our purposes of data processing as disclosed above. Where personal data is transferred to our processors, we ensure that we have applicable data processing agreements in place.

In addition, we may share personal data in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business and in connection with other similar arrangements.

Otherwise, personal data shall only be disclosed to third parties (i) with the consent of the data subject, (ii) pursuant to statutory obligations or (iii) where required by competent authorities pursuant to the applicable laws.

The controller might transfer personal data outside the EU or EEA territory. In such transfers of personal data to a third country or an international organisation, we ensure that either the European Commission has decided that the third country or international organisation has ensured an adequate level of data protection or we use European Commission approved standard contractual clauses.

YOUR RIGHTS

Information requests and changes: The customer has the right to check and change/rectify information about him-/herself.

Denial and removal of data: Customer has the right to deny the disclosure and processing of his/her information for advertising, direct marketing and other marketing purposes. The data can be removed from the register at the customer's request or due to the end of the customer relationship, if legitimate according to financial laws and regulations.

Right to restriction of processing: Customer may request that we restrict the processing of their personal data. We will restrict the processing of personal data if we do not have other legitimate purpose for which the data is necessary.

Right to object to processing: In certain cases, you may have the right to object to processing of personal data concerning you. The data subject always has the right to object the use of his/her personal data for purposes of direct marketing.

You may withdraw your consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

These rights may be exercised by contacting us via contact details provided above.

In case you consider our processing activities to be inconsistent with the applicable data protection legislation, the data subject has the right to lodge a complaint with the competent data protection supervisory authority.

CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time, whenever necessary. The changes might also be based on the amendments of the legislation. All changes will be made available on our website or otherwise.