

Privacy Policy

Startup Genome LLC and its affiliates (“Startup Genome”, “we” or “us”) are committed to protecting the privacy of all individuals who (“you”):

- visit any websites or mobile sites offered by Startup Genome, including without limitation startupgenome.com and including all subdomains thereof, present and future (the “Websites”);
- participate in our surveys or email campaigns (the “Surveys”);
- obtain, purchase, inquire about, or view our reports or white papers regarding startups, biotechnology and technology, and startup and tech ecosystems (collectively, the “Reports”);
- post information, material, or commentary to our Websites or other publicly accessible online sites configured to accept any information or subject matter in any medium (the “Uploads”); and
- are or have registered with us to receive information, including Reports, newsletters, or any other information, on the Websites, or with a Startup Genome representative by email, at an event, web seminar, telephone or other in-person meeting (the “Registrations”).

To make this policy easier to read, we call the Website, the Surveys, the Reports, the Uploads, and the Registrations together, the "Offerings". When we talk about “Personal Information”, we mean information relating to you or other identifiable individuals, and which may include but is not limited to your name, mailing address, telephone number, e-mail address, business facsimile number, and credit card information; except that Personal Information does not include information that has been anonymized or aggregated, nor does it include certain business contact information used for the purpose of communicating or facilitating communication with you, as an individual, in relation to your employment, business or profession and which cannot be used to identify you outside of such employment, business or profession. For example, a business email comprising of your name may be considered Personal Information, whereas a telephone number for contacting a place of business may not be. Please note that for the purposes of this Privacy Policy, anonymized or aggregated information will include any information that cannot be used to alone or in combination with other information about you that we collect from you via the Offerings to uniquely identify you.

It is Startup Genome’s policy to respect your privacy and the privacy of all users of the Offerings. This privacy policy respecting our treatment of Personal Information collected by Startup Genome (the “Privacy Policy”) has been established to help you understand our commitment to protecting your privacy and personal data, and the steps we take to ensure it.

Startup Genome reserves the right, at any time, to modify or replace the Privacy Policy. The most recent version of the Privacy Policy is available

at startupgenome.com/legal/privacy. Please check the Privacy Policy periodically for changes, though we will also notify you via email or other direct electronic communication method of any changes that materially impact your use of the Offerings or the treatment of your Personal Information. While we will endeavor to re-obtain your consent after any such changes, we will, subject to your exercising your right to correct or delete your Personal Information (see below) as well as our Storage Policy (see below), maintain your Personal Information for the purposes of contacting you for the purposes of obtaining such consent upon any such changes.

Startup Genome and Personal Information: What, Why and How

As a matter of course, we will primarily only collect Personal Information in the following two ways: (1) we request certain information when we perform our Surveys; and (2) we request certain information when you request our Reports. In both cases, we typically request your name and business email (which may or may not constitute Personal Information) in order to respond to requests or to provide you with requested Reports, and we may also collect certain demographic information, that is primarily related to data subjects in their professional capacities, and includes position, age, gender, education level (which is anonymized and/or aggregated and then stored separately from, and without linkage to, any Personal Information). We may, however, collect information in other ways from time to time, for example, at trade shows, direct communications, etc.

Our main goal, with respect to any information we collect and use, is to research information relating to startup founders, collected by way of Survey, and which may be supplemented with secondary research and data from global and local partners, to create the world's most comprehensive research on startups, and then make this research available in our Reports (the "Purpose"). While these are our primary research activities, other purposes and uses may be possible as noted below.

We will always collect your Personal Information by fair and lawful means (for example, by requesting such information when you request or inquire about a report on our web site; register to receive general, market, or commercial information, such as our Reports or product information; or if you register for or inquire about an event or web seminar hosted or made available by Startup Genome). We may collect Personal Information from you directly and/or from third parties, where we have obtained your consent to do so or as otherwise required or permitted by law.

Free and Informed Consent and Legitimate Interests

For Personal Information collected after May 25, 2018, we will obtain your opt-in, informed consent for the collection and Purposes as set forth herein. A record of such

collection shall be maintained by Startup Genome. For all Personal Information collected before or after May 25, 2018, whether or not such consent has been obtained, Personal Information may be used by Startup Genome in connection with Startup Genome's Legitimate Interests.

These Legitimate Interests include the preparation of research materials by Startup Genome, an organization that is not intended to make a profit, for the Purposes noted above, which are necessary to meet the organizational objectives of Startup Genome. Those objectives include the development and fostering of biotechnology startups and ecosystems in locations around the globe.

Other Purposes and Uses of Personal Information

We will generally identify the purposes for which we use your Personal Information at the time we collect such information from you and obtain your consent, in any case, prior to such use. We may use your Personal Information for the following secondary purposes (for clarity, the term Purposes, as defined above, shall include these secondary purposes):

- to facilitate your use of the Websites, we may collect your IP address and store cookies on your device (see below for more information on Cookies);
- to respond to your inquiries and provide you Reports that you have requested;
- to aggregate and anonymize collected information to develop profiles about companies and persons interested in companies, to perform sales analyses based on same, and identify opportunities and strategies for certain classes of businesses and/or users;
- to advise you about new products and services that may be of interest to you;
- to include you on Startup Genome's mailing list(s) and/or to send you information relating to Startup Genome's Surveys, Reports, or other Offerings;
- to administer the Websites and other Offerings;
- to investigate legal claims;
- such purposes for which Startup Genome may specifically obtain consent from time to time; and
- such other uses as may be permitted or required by applicable law.

Disclosure of Information

We will not sell, rent, lease, share or otherwise disclose to third parties any Personal Information provided to us, unless (1) consent is given to the disclosures in accordance with this Privacy Policy, having had prior access to this Privacy Policy, or in accordance with another specific request for consent, or (2) the information is first rendered anonymous, including but not limited through aggregation, encryption, obfuscation, hashing or other means, or (3) disclosure is required by law.

From time to time, we may share Personal Information and other information that we have collected about you:

1. When you explicitly consent to the disclosure of such information.
2. Where we are legally required to do so, such as in response to court orders or legal process, or to establish, protect, or exercise our legal rights or to defend against legal claims or demands.
3. If we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person, or other exigent circumstances.
4. If we believe it is necessary to investigate, prevent, or take action regarding situations that involve abuse of the Offerings infrastructure or the Internet in general (such as voluminous spamming, denial of service attacks, or attempts to compromise the security of the Website infrastructure or the Offerings generally), or to otherwise protect our assets or rights.
5. To a parent company, subsidiaries, joint ventures, or other companies controlling, controlled by, or under common control with Startup Genome.
6. If we are acquired by or merged with another entity (in which case we will require such entity to assume our obligations under this Privacy Policy or inform you that you are covered by a new privacy policy complying with applicable law);
7. To our service providers that help us in carrying out the Purposes, including email distribution services (e.g. Mailchimp), cloud- or contract-based data storage and data analysis providers, and payment services (while most of our Reports are provided without charge, we reserve the right to charge fees for any Offerings in the future); and
8. If information has been made public, is aggregated, anonymized, or is otherwise rendered non-Personal Information.

Please note that we may send Personal Information outside of the country for the Purposes, generally for, but not limited to, reasons relating to processing and storage by our service providers. For example, we may have cloud storage providers with data storage facilities in the US, Canada, Europe, or other countries. Please note that data that is transferred to such other jurisdiction is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

We further note that information that is anonymized, aggregated, or otherwise rendered non-identifying to any data subject may be used in Reports. These Reports will be disclosed to third parties, as they are made available upon request, and shall remain available indefinitely.

Privileges of Data Subjects

We grant you the following privileges with respect to your own Personal Information that we have collected or stored in accordance with this Privacy Policy:

1. You have the right to see your own Personal Information in our storage.
2. You have the right ensure that your own Personal Information in our storage is correct, and if not, to request correction of it.
3. You have the right withdraw consent for the activities outlined by the Privacy Policy as they may apply to your own Personal Information in our storage any time after consent is provided.
4. You have the right to request deletion of your own Personal Information in our storage.

Exercising these privileges is easy. Send a request to our Privacy Representative at privacy@startupgenome.com with your name, email, and your request as relates to one of the four privileges outlined above.

Security of Personal Information and Breaches

We have implemented reasonable physical, organizational, contractual and technological security measures to protect your Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification. Only Startup Genome representatives with a business 'need-to-know' or whose duties reasonably require such information are granted access to your Personal Information.

No transmission over the Internet or electronic storage can be guaranteed completely. As a result, while we strive to protect personal information, we make no warranty or guarantee. You can help protect the security of your personal information. Startup Genome requires as a condition of the use of the Offerings that you keep any user identifiers and/or passwords that you may use in association with the Offerings secure and do not share the use of your account with other individuals. Should we become aware of a breach of our security involving your personal information, we will take steps to notify you in a timely manner and shall comply with all other legal requirements.

Storage of Your Personal Information

There is no fixed period for storage of your Personal Information.

We will, however, remove Personal Information upon occurrence of any of the following:

- A request from you for deletion of your Personal Information, or withdrawal of your consent under this Privacy Policy,
- If Startup Genome learns that any Personal Information has been collected unlawfully, or Startup Genome is made aware that certain Personal Information should be deleted to ensure compliance with an applicable legal obligation, or
- A request for deletion from any supervisory authority or legal authority (e.g. police, third-party having applicable court order) having sufficient legal authorization.

The storage period for any aggregated or anonymized information this is not Personal Information is indefinite, particularly if that information is used in any Reports, or research used for or intended to be used for Reports.

Contacting preferences

In addition to a request regarding the four privileges above, you may opt out of marketing communications sent by Startup Genome by following the unsubscribe instructions included in each marketing email or by contacting us via email (privacy@startupgenome.com). Startup Genome may use a third-party email distribution service to manage and distribute our communications (e.g. Mailchimp).

Children

Our services are directed to technology professionals and not intended for children 18 or under.

Cookies

A “Cookie” is a small file placed on your device when you visit our Websites to provide Startup Genome certain information about you and your interactions without Websites during subsequent visits; we use the term “Cookie” in this Privacy Policy to refer to cookies, pixel tags, web beacons, and other such files or programs that may be installed on your device for similar purposes. We associate a Cookie with information that may identify you (or your device) as a prior user of our Website, as well as certain attributes or actions that you have made in the past in association with the Website, and/or they may track your behaviour (in non-identifying ways) while you visit our Website. We may also use Cookies to improve and customize your experience with the Offerings, to help us recognize you across the Offerings, as well as to measure and analyze use of the Offerings and responses to our Surveys.

Our server logs collect information about visits and system capabilities as you access and use the Offerings. We do not routinely associate such data with your profile except

for investigative purposes as specifically described below. You may disable or block any by using the tools available in most browsers.

If you are registering for our websites, you may choose whether to activate automatic recognition of your computer based on the placement of a persistent cookie that identifies your computer. If you choose not to accept that persistent cookie, or to delete it at any time, you may be asked to re-enter certain information each time you access the website and or other information affecting your use of the Websites, for example, language and jurisdiction.

Contacting Startup Genome's Privacy Officer

All comments, questions, concerns or complaints regarding your Personal Information, this Privacy Policy or our privacy practices, should be forwarded to our Data Protection Officer as follows.

E-mail: privacy@startupgenome.com

Or

Attn: Data Protection Officer
Startup Genome
STE 260, 344 Thomas L. Berkley Way
Oakland, CA
United States of America
94612-3525