



**Aptos Partners / Aptos LLC**  
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## Privacy Policy

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### General

Aptos LLC, together with its affiliates and management entities (“Aptos Partners” or “we”) are committed to protecting the privacy of visitors to our website (the “Site”). This Privacy Policy seeks to help you understand whether and how we collect your personally identifiable information when you visit the Site and how we use such information.

This Privacy Policy does not address our privacy practices concerning any personal information we collect on or from our investors. We address those practices in separate notices sent to our investors or potential investors.

This Privacy Policy applies when you visit the Site. By using the Site, you acknowledge this Privacy Policy, which may be updated by us at any time. If you do not agree to this Privacy Policy for any reason, please do not use the Site or share your personally identifiable information with us as discussed below. Please note that this Privacy Policy applies only to the Site and not to any other website that may be linked to it. We do not control the privacy policies or practices of other persons or entities. We encourage you to ask questions and read the privacy policies of other websites before you disclose any personal information to them.

### Contact Us

If you have any questions or comments about this Privacy Policy, you can write to us at Privacy Matters, Aptos Partners, 778 Contra Costa Avenue, Berkeley, CA 94707-1937.

### How We Collect, Use, Share, and Protect Your Information

We do not collect any personally identifiable information from you through the Site except as described below. Personally identifiable information (also referred to as personal data) is information that personally identifies you, or can be used with other information to identify you, such as your name, postal address, e-mail address, or credit card information (or other information that is associated by us with such above information). We are not responsible for any other websites accessible from or linked to the Site, including their privacy policies or information collection practices. Further, we do not control any cookies, web beacons, or other similar devices that may be placed on the Site by third parties.

*Site Visits:* In general, we automatically gather certain information from the Site visitors, such as the number and frequency of your visits, through server logs. This information may include the URL of the last and next website you visit, your browser and operating system, your IP address, how long you spend on the Site, and what pages you view there. Additionally, we automatically gather login information that you provide when you access the password-protected section of the Site.

*Other:* We will collect any other personally identifiable information from you if you voluntarily provide it through the Site, such as by providing your e-mail address and other personal information to receive further information about us.

### How We Use Your Information

We may use the personally identifiable information collected via Site visits on an aggregate basis to improve the Site, provide visitors with customized services and information, and for other similar purposes. We may also use this information to understand better how our visitors use the Site and to research our visitors’ demographics, interests, and behavior.

We will use the personally identifiable information that you voluntarily provide for the purpose of processing and responding to your inquiries and requests and to improve the Site and offerings.

### Sharing Your Information

We may share your non-personally identifiable information with others, such as our affiliates, for informational or promotional purposes. Non-personally identifiable information is information that does not personally identify you, and cannot be used to identify you, including anonymous information and aggregate data.

We may use service providers to facilitate our services and perform functions on our behalf, such as sending postal mail and e-mail and providing technical, analytical, and hosting functions for the Site. These companies and individuals (which may include our affiliates) may have access to your personally identifiable information we collect through the Site, as permitted by law and as needed to perform their functions, but may not use it for any other purpose. We require that these companies and individuals otherwise keep this information confidential.

If Aptos LLC is sold to, merges with, or transfers substantially all of its assets to another entity, Aptos LLC has the right to share your personally identifiable information with that entity, its affiliates and its advisors, to the extent lawfully permissible.

We will not otherwise share your personally identifiable information, except as required by law, requested by governmental entity or law enforcement authority, subpoena, court order or discovery request, or when we otherwise believe in good faith that such disclosure is necessary or appropriate in connection with any activity that violates the law (including relating to intellectual property, fraud, contracts, and privacy) or may expose us to liability. We can (and you authorize us to) disclose any of your information in such circumstances.

### **Security**

The security of your information is important to us. We employ several different technical, administrative, and physical security measures to protect any personal information you provide through the Site from unauthorized access or use. You should be aware, however, that “perfect security” does not exist on the Internet, and there is always the risk that unauthorized persons may access or use your personal information. You use the Site and send us such information at your own risk.

### **Privacy Policy Changes**

We may revise or supplement this Privacy Policy from time to time and such changes will be posted on this page.

### **International Use**

Aptos LLC makes no claims that the Site is appropriate or lawful for use or access outside the United States. Access to the Site from countries or territories where such access is illegal is prohibited. If you access the Site from outside the United States, you do so at your own risk. If you are a visitor to the Site based in the UK or the EEA, please see the section below headed “Visitors based in the UK or the EEA”. You are solely responsible for complying with all local laws, rules, and regulations applicable to you regarding online conduct and access to the Site.

Furthermore, our databases are located in the United States. By sending us your data, you consent to its transfer to and storage within the United States.

### **Visitors based in the UK or the EEA**

For the purposes of Regulation (EU) 2016/679 (the “EU GDPR”), and the EU GDPR as it forms part of the laws of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (the “UK GDPR”), and all other applicable laws in the EEA or UK relating to privacy or the processing or protection of personal data (together with the EU GDPR and UK GDPR, the “European Data Protection Laws”), Aptos LLC is the controller of any personal data (referred to as “personally identifiable information” above) collected by us via the Site.

This section supplements our Privacy Policy and only applies to you to the extent that your personal data collected by us via the Site is subject to the European Data Protection Laws, including where you are based in the UK or the EEA. You do not need to take any action as a result of this section of our Privacy Policy, but you do have certain rights as described below in the section headed “Your rights”.

#### Collection, use and sharing of your personal data

The personal data that we collect and who we share such personal data with are described above and below.

We do not collect any special categories of personal information about you via the Site (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences via the Site.

We rely on various legal bases under the European Data Protection Laws in order to process your personal data, including our legitimate interests, contractual necessity and as required by law.

This site is only intended for individuals who are at least 13 years of age. We do not knowingly encourage or solicit visitors to this site who are under the age of 13 or knowingly collect personal information from anyone under the age of 13 without parental consent. If we learn we have collected or received personal information from an individual under the age of 13, we will delete that information.

#### Why we use your personal data

To the extent that you provide us with any personal data, through or in connection with the Site, we may use such data for the following purposes:

- Purpose: To monitor, administer, and improve the use of the Site | Legal Basis: Legitimate interests in operating and improving our business
- Purpose: Processing and responding to your enquiries and requests and to improve the Site and our service offerings. | Legal Basis: Legitimate interests in operating and improving our business
- Purpose: Maintaining a record of your enquires, requests and Site visit | Legal Basis: Legitimate interests in operating and improving our business, or compliance with our legal obligations
- Purpose: To make suggestions and recommendations to you about services that may be of interest to you | Legal Basis: Legitimate interests in operating and improving our business, or your consent

Note that we may process your personal data on more than one legal basis depending on the specific purpose for which we are using your personal data.

No automated decision-making, including profiling, is used when processing your personal information.

#### Marketing

We will send you direct marketing communications where we have obtained your prior consent to keep you informed of our services in which you might be interested, or based on our legitimate business interests where we have an existing relationship with you and we wish to contact you about similar services in which you may be interested. You may opt-in to certain kinds of marketing, and all forms of marketing at any time, by e-mailing us at [info@aptospartners.com](mailto:info@aptospartners.com).

#### Retention of your personal data

We will keep your personal data only for as long as is reasonably necessary for the purposes set out in this section of the Privacy Policy, unless a longer retention period is required by law. We will not keep more data than we need for those purposes. For further information about how long we will keep your personal data, please contact us.

#### Cookies

Information regarding how you access the Site (e.g., browser type, access times, and IP address) and your hardware and software is automatically collected through the use of cookies (a small text file placed on your hard drive) or other similar technologies or tools. This information is used to improve performance of the Site and for our business purposes. Where cookies are not necessary for us to provide the services you have requested or for the functioning of this Site, we ask you when you visit the Site (via our cookie banner) to consent to their use and explain the cookies that the Site uses, why they are used, and for how long they are stored. You may opt-in to accept cookies automatically by changing the settings on your browser. If you opt-out of certain cookies, you may not be able to access certain parts of the Site. You may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information about types of cookies, how they are used, and how you manage your cookie preferences.

#### International transfers of your personal data

As noted above, Aptos LLC's databases and certain entities in our group are based in the US. In addition, certain of those third parties with which we share your personal data (as described above) may be located outside of the EEA or UK. As such, we may transfer your personal data to such affiliates and third parties. Where we do so, we will do so in compliance with European Data Protection Laws. Please contact us for more information on how we make such transfers.

#### Your rights

You have the right to access the personal data we hold about you, and there are a number of ways you can control the way in which and what data we store and process about you. To exercise these rights and controls, please contact us.

- Access: You have the right to ask for a copy of the personal data that we hold about you free of charge, however we will charge a reasonable fee if we think that your request is excessive to help us cover the costs of locating the information you have requested (or alternatively we may refuse to comply with the request in such circumstances). We will respond to your request as soon as possible and (save for in certain circumstances) within one month.
- Correction: If there are any inaccuracies in the data we hold about you, please contact us and we will correct them.

- Deletion: If you think that we should not be holding or processing your personal data any more, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- Restrictions on use: You may request that we stop processing your personal data (other than storing it), if: (i) you contest the accuracy of it (unless the accuracy is verified); (ii) you believe the processing is against the law; (iii) you believe that we no longer need your personal data for the purposes for which it was collected, but you still need your data to establish or defend a legal claim; or (iv) you object to the processing and we are verifying whether our legitimate grounds to process your personal data override your own rights.
- Object: You have the right to object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we will demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Right to data portability: Where we are processing your personal data based on your consent or for performance of a contract with you, you have the right to request that we transfer your personal data to a third party controller in a secure manner, but only where it is technically feasible to do so without affecting the rights of other individuals.
- Withdraw consent: In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Complaints

If you have any complaints regarding how we use your personal data, we would appreciate the opportunity to discuss those concerns with you in the first instance. However, should you wish to lodge a complaint with regards to how your personal data has been processed by us, please contact your local supervisory authority in the UK or the EEA.