

# Data Protection Policy

Applicable to residents of the European Economic Area

## Part 1: Data We Collect

### Introduction

Renaissance Capital LLC and its affiliated companies (“Renaissance Capital”, “we” or “us”) collect and retain certain data in order to provide services to our users. In this Data Protection Policy (“Policy”), we describe how Renaissance Capital collects, uses and discloses your data.

Please read this Policy carefully. By providing your personal data to Renaissance Capital or by visiting or using our websites, you acknowledge the practices described in this Policy. Your use of our services, including our websites, and any dispute over privacy, is subject to this Policy and, as applicable, the Agreements listed in the Appendix which include limitations on damages and the resolution of disputes.

The Data Controller of the collected data is Renaissance Capital LLC.

### Data Collection

Renaissance Capital collects your personal data. Personal data is any information that alone, or together with other information, relates to a natural person. Personal data can include your name, phone number, email address, financial information, online identifiers, etc. Not all data collected by Renaissance Capital is personal data, either because it relates to a company, or it is not identifiable. Below we describe how we use and disclose personal data.

### What personal data do we collect?

We may collect personal data when you or your company establishes an account, when you subscribe to our emails and when you reach out to us with questions about our services. If you do not wish to provide data to us, we may be unable to provide certain services to you.

Renaissance Capital may collect the following personal data about you:

- Your name
- Your email address
- Your address
- Your credit card information
- Your phone number

If you communicate with us by email, we may keep a record of that communication.

## Log files, IP addresses and cookies

Like most standard website servers, we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider, referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track a user's movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information.

In order to get in-depth analytics to help optimize our services for you, we utilize cookies. A cookie is a small file of letters and numbers that is stored on your computer or other device when you visit a website. Cookies allow websites to recognize devices and store certain information, such as user preferences. This helps us to provide you with a useful experience when you visit our websites and also allows us to improve our services.

We place two different cookies in the browsers of all users of our password-protected websites. The first cookie is placed during log-in. This cookie tracks the authentication of the user so the user is not required to log in to every new page. Users of IPO Intelligence and IPO Pro cannot opt out of this authentication cookie. The second cookie placed in the browser is a Google Analytics cookie. A Google Analytics cookie sends a non-descriptive unique identifier to Google Analytics. We then match the unique identifier to a user name so we may track usage and determine what features of our services users prefer.

You may manage cookies on your browser by setting your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. The help feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to receive notice when a new cookie is set, and how to disable cookies altogether. However, if you choose to restrict cookies, please be aware that the functionality of the websites may be impacted.

## Part 2: Data Use and Disclosure

### How do we use personal and other data?

We use the personal data and other data that we collect for the purposes for which it was provided, as required by law and for our business purposes, including:

- To establish and administer accounts and your relationship with us, to fulfill the terms of any agreement you have with us, and to otherwise provide our services to you;
- To communicate with you, notify you about important changes or updates to our services, and to provide you with support;
- To comply with our legal obligations and protect our legal rights, including but not limited to complying with recordkeeping, reporting and tax obligations under applicable law;
- To market to customers as permitted by applicable law. For instance, we may use your personal data such as your name and email address to contact you about our products or

services we think may be of interest to you. Although we hope you will find all our communications of interest, you may at any time follow the link at the bottom of each email communication to adjust your email preferences;

- To help us understand user interests when improving our current services or in creating new services;
- To count and recognize users of our websites and discrete website features;
- To help us understand how users use our websites and services;
- To support website performance, perform website analytics and improve website design and functionality;
- To assess overall engagement of users;
- To aid in maintaining the security of our websites.

### **Legal bases for using personal data**

The legal bases that we rely upon to use personal data are:

- The personal data is necessary to perform a contract or prepare to enter into a contract with you, or your company;
- The personal data is necessary to comply with an applicable legal or regulatory obligation that we have;
- You have provided your consent to us to use your personal data. If you have given your consent to us to use your data, you may withdraw that consent at any time.
- Our use of your personal data is in our legitimate interest as a commercial organization. For instance, it is a legitimate interest of ours to use personal data to perform marketing for our services and to understand user preferences to improve our services. In these cases we will use your personal data in a manner that respects your privacy rights. You have a right to object to this type of personal data processing as explained below.

### **To whom do we disclose personal and other data?**

We may disclose personal data to affiliates, data processors and third parties for the following purposes, as permitted by law.

**Affiliates:** We disclose personal data to our affiliates for the purposes described in this Policy. Renaissance Capital's affiliates may contact you by email, in accordance with applicable law, to make you aware of our service offerings.

**Data Processors and Analytics:** We disclose personal data to data processors who use it to perform tasks on our behalf. Among other things, these data processors help us to administer your account, and manage and improve our websites. Our data processors may collect, process, and retain data about you directly on behalf of Renaissance Capital. These data processors have limited access to your data and may use it only to perform certain tasks on our behalf. The data generated by your use of our websites may be transmitted to and stored by the data processors on servers outside your country of residence. Refer to the Appendix to see the list of our data processors.

We may also disclose your personal data to our auditors, legal advisers, other professional advisers or regulators as may be necessary in order to comply with legal or regulatory obligations. We may use and disclose information about you as we believe is reasonably necessary to protect our rights and property, including to establish legal claims or defenses, to obtain legal advice and to protect against fraud and abuse. We may also disclose your personal data when required to under valid legal process.

We reserve the right to disclose data to facilitate the licensing, merger, sale, assignment, acquisition, financing, insuring, bankruptcy, or other transfer of our technology or business, or a portion thereof, to third parties, in accordance with applicable law.

If you are located outside of the United States, please be aware that personal data we collect will be processed and stored in the United States. By using our services and submitting your personal data, you agree to the transfer, storage and/or processing of your personal data in the United States. In addition, data processors that process your Personal Data on our behalf may be based outside the European Economic Area or may use cloud service providers to process and store your personal data outside the European Economic Area.

## **Part 3: Data Controls**

### **Information security, controls and retention**

We use physical, electronic, and procedural safeguards to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. However, no data security measures can guarantee complete security all of the time.

We also give you the ability to control how much you hear from us. For our password-protected websites, you may adjust your email subscription settings to determine how many emails you receive from us. A link is provided at the bottom of each email that directs you to your email subscription settings which include the choice to opt out of emails entirely.

If you do not have a paid subscription with us but receive our communications, you are given the option to unsubscribe through the preferences link at the bottom of each email. You may also update your personal data with this feature.

We will retain your personal data for as long as necessary to provide our services to you, to fulfill the purposes described in this policy and our legitimate business purposes, or as required by law or regulation.

### **Your legal rights**

Subject to certain exceptions, and in some cases depending upon the particular processing activity, you have certain rights in relation to your personal data:

- **Right to access personal data** - You have a right to obtain confirmation from us as to whether or not we process your personal data and the right to access a copy of your personal data.
- **Right to rectification** - You have the right to request that we rectify inaccurate personal data and the right to provide additional personal data to complete any incomplete personal data.
- **Right to erasure** - You have the right to request that we erase your personal data.
- **Right to restrict the processing of your personal data** - You have the right to request us to restrict processing your personal data.
- **Right to data portability** - You have the right to be provided with your personal data in a commonly used machine-readable format and to have us transfer it directly to another data controller.
- **Right to object to the processing of your personal data** - You have the right to object to the processing of your personal data.
- **Right to lodge a complaint with your local supervisory authority** - You have a right to lodge a complaint with your local data protection supervisory authority if you have concerns about how we process your personal data. Although we encourage you to attempt to resolve any issues with us first, you have a right to contact your supervisory authority at any time.

If you would like to exercise any of the rights described above, please send us a request at the contact information provided in the Appendix. In your message, please indicate the right you would like to exercise and the data that you would like to access, review, correct, or delete.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data you have requested. We reserve the right to charge a fee, where permitted by law, for instance if your request is excessive.

Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfill your request. In some circumstances, we may need to engage or consult with other parties in order to investigate and resolve your request. We will keep records of your request and any resolution. We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

## **Children's Privacy**

Our websites are not intended for the use of children under the age of 18, are not offered as such, and we do not collect data from anyone we know to be under the age of 18. Children under the age of 18 should ask their parents for permission before using our websites or when sending information about themselves over the Internet.

## **Contact Us**

If you have any questions relating to this Policy, or concerns about the way in which we handle your personal data, you may write us or send us an email. Our contact information is provided in the Appendix.

## **Changes to this Policy**

From time to time we will post changes to this Policy on our websites. We recommend that you review this Policy periodically. If we make a material change to this Policy, you will be provided with appropriate notice. Your continued use of our websites after the posting of any modified Policy indicates your acceptance of the terms of the modified Policy.

*August 31, 2018*

## Appendix

Data Controller Contact Information	Renaissance Capital LLC 165 Mason Street Greenwich, CT 06830 <a href="mailto:renaissance@renaissancecapital.com">renaissance@renaissancecapital.com</a>
Websites	<a href="http://www.renaissancecapital.com">www.renaissancecapital.com</a> (public website) <a href="http://www.ipointelligence.com">www.ipointelligence.com</a> (password-protected site) <a href="https://ipopro.renaissancecapital.com">https://ipopro.renaissancecapital.com</a> (password-protected site)
Agreements	IPO Intelligence Service Agreement IPO Pro Terms of Use
Affiliates	Renaissance Capital Greenwich Funds Renaissance Capital Investments, Inc. Renaissance Capital International, LLC

### Data Processors:

#### *Google Analytics*

We use Google Analytics as a data processor. We control the data that is sent to Google Analytics so we can track usage in order to provide a better experience for our users. We send to Google Analytics a unique identifier and a Transaction ID, both of which are alphanumeric database identifiers. Google Analytics also records a cookie in the browser of any user accessing our website.

#### *Infusionsoft*

We use Infusionsoft to collect and store data such as name, email and address in order to process service renewals, send marketing and offer products and services tailored to the user's needs. When you fill out a form to receive something from us, when you reach out and contact us, or when you or your company purchase one of our services, the above data is stored in Infusionsoft.

#### *Chargify*

We use Chargify as a subscription management vendor to manage your subscription services when you purchase our IPO Pro service. Chargify collects data about you such as your name, address, email and type of payment. It does not store your credit card number.

#### *BrainTree*

We use BrainTree as a payment processor to process payments made to us when you purchase our IPO Pro service. In connection with the processing of your payments, we do not retain any financial information such as credit card numbers. Rather, all such information is provided directly to BrainTree.