

## Privacy Policy

Last Updated: October 11, 2021

Welcome to Secondaries.io. We appreciate your interest in the service. It is important that you read and understand our commitment to respecting your privacy.

This Privacy Policy is provided by Oversubscribed Capital LLP (“Secondaries.io”, “we” and “us”), and it applies to ways in which we interact with visitors to our website <https://secondaries.io/> (the “Site”) and users of any digital services we provide (“Data Subjects”, “user”, “you”) on the Platform as these terms set out in General Terms of Services and incorporated herein by this reference.

This Privacy Policy describes why and how we collect, use, store, process, disclose and transfer data that we may collect from Data Subjects in accordance with the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679). The personal data collected from the Site will be processed automatically by Secondaries.io, the data controller, which can be contacted at [info@overcap.me](mailto:info@overcap.me). It applies to personal information provided to us, both by individuals themselves and by third parties, such as companies and institutions that use our services and provide us with information about their employees or business relationships in that context. Furthermore, Secondaries.io may allow third-party companies to collect certain information for statistical purposes, when you visit our website (including your IP address), in order to optimize the efficiency of our website.

By accessing our Service, you accept our Privacy Policy and you consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy. Each time you visit our Site or use the Service, and any time you voluntarily provide us with information, you agree that you are consenting to our collection, use and disclosure of the information that you provide, and you are consenting to receive emails or otherwise be contacted, as described in this Privacy Policy. Whether or not you register or create any kind of account with us, this Privacy Policy applies to all users of the Site and the Service.

What data do we collect?

We collect your Non-Personal Data, which includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and a number of clicks. We also collect your Personal Data in connection with our business that reasonably can be used to identify you as an individual person, including, among other things:

- Personal identification information (e.g. name, email address, phone number, country, state or other similar identifiers);
- User Content, such as the content of communications, suggestions, questions, comments, feedback, and other information you send to us, that you provide to us when you contact us, or that you post on our Services (including information in alerts, folders, notes, and shares of content), and similar data;
- Account information (e.g. security-related information including user names and passwords, authentication methods, and roles, billing-related information including account profiles, money

transfers including communications on bank transfers, assets, investor profile, credit history, debts and expenses);

- Device & Browser Information, such as network and connection information (including Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data.
- Cookie-related information. This data is provided by your browser and visits you made on our Site. We may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser. Persistent cookies can be removed by following your Internet browser help file directions.

This data and, more generally, the information exchanged between you and our company in the context of our relations, is confidential. This confidentiality obligation particularly concerns information relating to your identity and your personal situation or wealth. This confidentiality obligation will continue after the end of our relationship.

How do we collect information?

We collect this information in the various legitimate forms including, but not limited to, the following:

- When you voluntarily submit information to our Site, send us an email or other written correspondence, place an order for any products or services, complete a survey, provide feedback, etc.;
- When you visit our Site using your browser's cookies, we automatically collect certain data. We use data collection tools ("Cookies") on our Site to record certain usage information, such as the number and frequency of visitors to our Site;
- When we collect the data indirectly from other sources (e.g., from public records or from a counterparty in possession of the data).

How do we use information?

Our organization will never share your personal information with third-party sites without taking prior permission from you. We do not sell any personal data and have not sold any personal data in the past. Though we share your personal information within the organization, business partners, authorized third-party services for the following purposes:

- To provide you with information regarding Secondaries.io services and assist you and answer your requests;
- To perform a contract with you or to take steps at your request before entering into a contract;
- To process details related to your requests such as performing activities relating to client management, financial management and administration;
- To meet requirements and orders of regulatory authorities and to comply with legal or regulatory obligations such as our obligations regarding know-your-client and anti-money laundering or other monitoring and auditing compliance;

- Other legitimate purposes, such as communicating with Data Subjects, creating, improving and developing our products and services, conducting market research, surveys, and similar inquiries to help us understand trends, clients and our Site visitor need.

The information required to obtain a response to a request are marked with an asterisk and failure to provide that information will prevent us from providing a response.

To whom do we share information?

We share information with third parties in certain circumstances, including the following:

- Service Providers. We share information with service providers that perform services on our behalf (e.g., third-party service providers to operate our Site). These companies may have access to your Personal Data but are permitted to use the information solely to provide the specific service or as otherwise permitted by law. We generally require these providers by contract to keep the information confidential.
- As Required by Law. We also disclose your Personal Data if we are required to make disclosures by applicable law or to the government or private parties in connection with a lawsuit, subpoena, investigation or similar proceeding, or as a part of our legislative or regulatory reporting requirements.

What are your data protection rights?

We would like to make sure that you are fully aware of your data protection rights. Every user is entitled to the following rights:

- The right to access. You have the right to ask for copies of your personal information provided to us.
- The right to rectification. You have the right to tell us to correct the Personal Data that you believe needs correction. You also have the right to complete the information you believe is incomplete. We kindly request that you inform us of, any changes to your Personal Data (such as a change in your contact details) using our contact details or by sending an e-mail to our registered email.
- The right to erase. You have the right to ask us to erase all your personal data at any time. In general, we will process and store your Personal Data for at least as long as it is necessary in order to fulfil our contractual, regulatory and statutory obligations. Subject to those qualifications, our goal is to keep such data for no longer than necessary in relation to the purposes for which we collect and use the Personal Data (we refer to the purposes as set forth above).
- The right to object. You have the right to object to our organization's processing of your personal data, under certain conditions. Secondaries.io takes very seriously any complaints we receive about our use of your Personal Data. Questions, comments, requests or complaints should be addressed to our registered email.
- The right to data portability. You can anytime ask us to transfer your personal information to any other organization or directly to you, under certain conditions.

## How do we protect your Personal Data?

All reasonable efforts are made to ensure that any Personal Data held by us are stored in a secure and safe place, and accessed only by our authorized employees and transferees. Your Personal Data held by us will be kept confidential. We will use all reasonable efforts to ensure that all Personal Data is kept secure and safe from any loss or unauthorized disclosure or use.

In respect of the collection, holding, storage, use, and processing of your Personal Data:

- We will process the data lawfully, fairly and in a transparent way.
- We will obtain the data only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- The data we collect will be relevant to the purposes we have told you about and limited only to those purposes.
- We will take reasonable steps to ensure that the data is accurate and kept up to date.
- We will keep all personal data in accordance with the various applicable retention periods, i.e. for five years after the business relationship ends should no shorter or longer period be specifically stipulated.
- We will use appropriate technical and/or organizational measures to ensure the appropriate security of the data.

## Links to other Sites

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

## Age of consent

By using the Service, you represent that you are at least 18 years of age.

## Changes to our Privacy Policy

We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy, we will post these changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. You should check this page from time to time to ensure that you agree with any changes.

## Contact us & Withdrawing consent

With Secondaries.io you are always in control of your personal information. We will always comply with any data protection legislation currently in force. If you have any questions regarding this Privacy Policy or the practices of this Site or wish to withdraw your consent for the continued collection, use or disclosure of your Personal Information, please contact us by sending a request to our registered email.