

This privacy policy was last modified on March 4, 2024

This Privacy and Data Protection Policy (this “Privacy Policy”) sets forth how Diadem Capital and its affiliates (collectively, “Diadem Capital,” “we,” “our,” or “us”) collect and process personal information that we receive. We are providing this Privacy Policy to satisfy disclosure requirements required under data protection and privacy regulations adopted by regulatory authorities in the jurisdictions in which Diadem Capital does business. Please note that certain of these disclosures may not apply in all circumstances.

This Privacy Policy applies to visitors to and users of this website and any other website maintained by us (collectively, our “Sites”), visitors to our offices, job applicants, individuals who contact Diadem Capital personnel in certain locations (via phone, video conference or other electronic means), prospective and existing customers and investors, business contacts, third-party service providers, vendors and suppliers. If you provide personal information to Diadem Capital about any person other than yourself, it is your responsibility to ensure that the other person understands how such information will be used, including the purposes set out in this Privacy Policy, before it is provided to us. If you provide us with such information, we are entitled to, and will, assume without confirmation that you have obtained such consent.

If you visit any of our Sites, please review this Privacy Policy carefully and in conjunction with the Terms of Service, which provide other important information regarding your use of our Sites. By accessing or using our Sites, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

1. Information we collect

We collect your personal information in a variety of ways.

- **Information you provide to us directly.** We may collect personal information, such as your name, address, email address, telephone number and other contact details, when you sign up with Diadem Capital or otherwise contact or communicate with us. If you set up a login for any of our Sites, we may also collect your username and password (if applicable). We may also collect information with respect to your marketing preferences and your subscriptions to our publications and alerts. If you are an investor looking for companies to invest in (“Investor”), we may collect information about your portfolio of funds. If you are a founder of a company looking for investors (“Founder”), we may collect information about your company, including financial information. If you visit our offices or telephone or teleconference any Diadem Capital employees, we may also collect personal information such as name, organization and other contact details; video images of you from CCTV footage (if in our offices) or via screen shots or electronic

recordings of teleconferences; date and time of your visit to Diadem Capitals offices; and telephone numbers and voiceprints if telephone calls are recorded. We may also collect inferences drawn from some of the personal information categories identified herein and used to create a consumer profile reflecting your purchasing and marketing preferences, characteristics, and behavior.

- **Information we receive from other parties.** From time to time, we may receive information about you from persons other than you, including our customers, other users of our Sites, investors, data service providers, vendors and suppliers. This information may include information required to process payments, such as tax ID numbers and wire instruction details, and information collected for anti-money laundering and terrorism sanction screening and know your customer databases. We may combine this information with other information we collect from or about you. In these cases, this Privacy Policy governs the handling of the combined information. We may also collect information about you that is publicly available.
- **Employment Information.** When you apply for a job with us, we may receive information such as your name, address, email address, telephone number, current and past employers, job titles and other personal information you include in application documents, such as your resume. You may also furnish us with health-related information in the event we undertake health screening or accommodate a disability when you engage with us.
- **Location Information.** We may collect your approximate location by your IP address. We do not collect your precise geographic location.

For information on how we use and process tracking technology on the Sites, please see the section titled “Use of Tracking Technology” below.

2. Use of personal information

Your personal information will be used: (i) in order to comply with our legal and regulatory obligations, (ii) because we need the information for reasons of substantial public interests, (iii) in order to comply with our obligations under contract, (iv) because we have a legitimate business interest in using it, (v) as otherwise permitted by law or (vi) for any other purposes we may describe when you provide the information, including for the following purposes (as applicable):

- to respond to your questions and handle and resolve requests for customer service or other complaints;
- to perform research with respect to the usage of the Sites (applicable to Site visitors);
- to operate, maintain and provide the features and functionalities of the Sites, including providing customer support and analytics from the Sites, or diagnose or fix technology problems (applicable to Site visitors);

- to understand our visitors and customers, including Investors and Founders, to tailor our product offerings and to analyze statistics and trends to make our Sites and products better and to develop new services or features;
- to inform our machine learning algorithms to enhance or customize our Sites;
- to communicate with you about employment opportunities for which you've applied or to fill open job positions as part of a recruiting process (if applicable);
- to maintain the security of our premises, personnel, assets, systems and intellectual property and to manage access to our premises and our disaster recovery procedures (applicable to office visitors);
- to pay you for your services (applicable to third-party service providers, vendors and suppliers);
- in order to comply with our obligations in connection with record-keeping requirements and applicable anti-money laundering, anti-corruption and bribery, terrorism financing rules, sanctions, and the prevention and detection of crime or other applicable laws or regulations of jurisdictions in which Capital conducts business (applicable to office callers, third-party service providers, vendors and suppliers);
- to maintain and provide appropriate management of our relationship with you, including to discuss your account;
- to exchange mail correspondence or documentation which may involve providing your contact details to couriers and service providers in charge of the delivery service;
- to engage your services in the future (applicable to third-party service providers, vendors, suppliers and business contacts);
- to contact you to set up meetings or phone calls between you and your Diadem Capital business contact(s);
- to send you surveys and promotional materials;
- to process your financing and subscription requests and to provide you with products or services that you request or in which you express interest and to alert you to product upgrades, special offers, updated information and other new products and services offered by Diadem Capital, our customers or our third-party partners (please see the section titled "Control Over Your Information" below for more information on your choices about marketing communications) and;
- for any other purpose for which we obtain your consent.

For information on how we use and process technology and cookies on the Sites, please see the section titled "Use of Technology and Cookies" below.

As noted above, we may use personal information you provide us to improve our machine learning algorithms. Read the section titled “Control Over Your Information” below on how you can opt out of our use of your personal information to train our algorithms.

3. How we share and disclose your information

We may share your personal information in the instances described below. For further information on your choices regarding your information, please see the section titled “Control Over Your Information” below.

We may share, and have shared, personal information we receive about you with the following categories of recipients:

Diadem Capital affiliates or partners and advisors;

Prospective and existing third-party service providers, vendors, contractors and agents of Diadem Capital as part of normal business operations, including providers:

- engaged to assist in know your customer and identity verification and anti-money laundering and terrorism screening (applicable to third-party service providers, vendors and suppliers);
- of accounting, banking and other data processing services;
- of information technology services and platforms/applications;
- of courier services or other package delivery services;
- of call recording and storage services (applicable to office callers);
- third-party outsourcing providers;
- building security personnel (applicable to office visitors);
- third parties acting on your behalf such as consultants and other agents;
- governmental authorities or law enforcement officials where required;
- financial institutions to wire payments to you (applicable to third party service providers, vendors and suppliers);
- advisors who provide audit, tax, financial and legal advice to Diadem Capital; and
- other parties to a merger, acquisition, reorganization, funding/investment round or similar transaction or proceeding involving Diadem Capital, or steps in contemplation of such activities.

Personnel employed by service providers generally may have access to your personal information for the purpose of performing duties for Diadem Capital but are prohibited from using such information for other purposes.

Diadem Capital may also disclose your personal information (i) to particular parties, including potential customers or investors, pursuant to your consent, (ii) to fulfill your instructions, (iii) to comply with applicable laws and regulations or the reasonable

requests of law enforcement, (iv) to enforce our Terms of Service or to protect the security or integrity of our Sites, (v) to exercise or protect the rights, property or personal safety of Diadem Capital, our visitors or others or (vi) to fulfill other applicable requirements.

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

Your personal information may be transferred to or shared with entities in countries where data protection laws might not exist or be of a lower standard than in the United States. This includes the transfer of personal information among Diadem Capital affiliated entities and the jurisdictions in which they operate. In addition, we may transfer or share your personal information with non-affiliated parties located in the same jurisdictions as Diadem Capital entities as well as other jurisdictions, and information may be stored and processed manually and electronically through global systems and tools for the purposes outlined in this Privacy Policy.

4. Control over your information

Email Marketing and Your Rights. You have the right to opt out of receiving email marketing communications from us. Generally, the email marketing communications that you receive from us will provide you an option to “unsubscribe” from receiving future email marketing communications from us. You may also unsubscribe from such email marketing by contacting us in accordance with the “How to Contact Us” section listed below. You hereby agree to immediately notify us, in writing, in the event you no longer own, license, or use an email address to which you subscribed to receive email marketing from us.

Do Not Track. Some web browsers may transmit “do-not-track” signals to the website with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. Unless otherwise required by law, we currently do not act in response to these signals.

5. How we safeguard and retain your information

Data safeguards: We seek to protect the security of your personal information and use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE, AND WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF YOUR PERSONAL INFORMATION. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF PERSONAL INFORMATION YOU

TRANSMIT TO THE SITE OR THE PRODUCTS OVER NETWORKS THAT WE DO NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE US WITH ANY PERSONAL INFORMATION AND DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT OR EVENT THAT MAY COMPROMISE THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL INFORMATION CAUSED BY A THIRD PARTY. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a username and password to access our Site, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact us immediately (and in any event within twenty-four (24) hours) if you have reason to believe that your username or password to our Site has been compromised. You acknowledge and agree that we may contact you via email or other electronic communications in the event we are legally required to notify you of a data security incident or event related to your personal information.

Data retention: We will retain your personal information only for as long as we consider necessary in connection with the purposes set out in this Privacy Policy, unless applicable law or regulations require or permit a longer retention period. In addition, we may retain your personal information for the duration of any period necessary to establish, exercise or defend any legal rights. We may anonymize or aggregate personal information and store it indefinitely in order to analyze aggregate metrics and trends.

6. Information collected through tracking technologies

Usage and Device Data. When you access and use the Site, we automatically collect details of your access to and use of the Site, including traffic data, usage logs and other communication data, and the resources that you access and use on or through the Site (e.g., browsing history, search history). We may also collect information about your device and internet connection, including the device's unique identifier (e.g., device type, IMEI, Wi-Fi MAC, IP address), operating system, browser type, and mobile network information. The Site may collect "diagnostic" data related to your use of the Site, such as crash data and logs, performance data (e.g., launch time, hang rate, or energy use), and any other data collected for the purposes of measuring technical diagnostics.

Cookies and Tracking Data. We use "cookies" and other tracking technologies within the Site. A cookie is a small file placed on your smartphone or other device. It may be possible to refuse to accept cookies by activating the appropriate setting on your smartphone or device. However, if you select this setting, some parts of the Site may become inaccessible or not function properly. In addition, the Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us to analyze data on your use of the Site (e.g., recording the

popularity of certain content and verifying system and server integrity). The Site may collect data about the advertisements you have seen or engaged.

Non-Cookie Technologies. We may deploy on our Sites certain types of “Non-Cookie Technologies” provided by our service providers to support our digital advertising programs. These technologies often include browser cache, locally stored objects, or the creation of a statistical identifier wherein an identifier, much like a cookie identifier, is calculated based on the characteristics of a browser or device that distinguishes it from other browsers or devices. These identifiers are calculated either from the data your browser or device shares automatically or with additional data specifically requested from your browser or device. For more information, see https://thenai.org/wp-content/uploads/2021/07/NAI_BeyondCookies_NL.pdf.

Website Monitoring. Please be aware that we, and our third-party service providers and partners, use cookies and other tracking technologies within the Site to, as applicable, monitor and record any and all activities and communications to, from, and on, the Site in order to safeguard, improve, and analyze usage of, the Site, and for the other purposes listed in this Privacy Policy. For the avoidance of doubt, you hereby acknowledge, agree, and consent to, such monitoring and recording by us and our third-party service providers and partners.

Our reference to any third party or their software or services is not an endorsement by us of such third party or their products and services, and we disclaim any liability for the use or operation of any third-party software or services.

7. Links to third-party websites

The Sites may contain links to and from third-party websites of our business partners, advertisers and social media sites, and our users may post links to third-party websites. Such links are provided for convenience only, and you access them at your own risk. If you follow a link to any of these Websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third party.

8. Children’s online privacy protection rule

The Site is not directed at, nor intended for use by, children. As a result, if you are under the age of eighteen (18), you are prohibited from accessing or using the Site (or with providing us with your personal information). If you believe that we may have any personal information from a child under the age of 18 years, please contact us at info@diademcapital.com.

9. How to contact us

If you have any questions about this Privacy Policy or the Sites, please contact us at info@diademcapital.com.

10. Changes to our privacy policy

We reserve the right to amend this Privacy Policy at any time. We will notify you if this Privacy Policy is amended by updating the “Last Updated” section listed above. It is your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made hereto. We may, in our sole discretion, provide you communications, including via email, about changes to our Privacy Policy; however, such communications do not abrogate or otherwise limit your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made hereto.