

EPIELAGIC VENTURE MANAGEMENT PRIVACY POLICY

Effective Date: September 9, 2024

Epipelagic Venture Management LLC (“**Epipelagic**,” “**Epipelagic Ventures**,” “**we**,” “**us**” or “**our(s)**”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the personal data that we collect from visitors (“**Visitor(s)**,” “**you**,” or “**your(s)**”) on the Epipelagic website, mobile application(s), and other Epipelagic services in or to which this Privacy Policy is posted or linked (each, individually or together, the “**Site**”).

By using our Site, you agree to the collection, use, and disclosure of your information per this Privacy Policy. By using the Site, you represent that you have read and understand this Privacy Policy and agree to be bound by the terms therein.

Please read this Privacy Policy carefully. Your agreement with the terms of this Privacy Policy is a prerequisite to your use of the Site. If you do not agree with the terms of this Privacy Policy, then you do not have permission to use this Site, and must stop accessing it immediately.

In this Privacy Policy, we define “**personal data**” as any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular natural person or household, such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of a natural person.

1. TYPES OF INFORMATION WE COLLECT

In the preceding twelve (12) months, we have collected the following categories and specific types of personal data:

Category of Personal Data	Specific Types of Personal Data Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, e-mail address, account name, Social Security number, driver's license number, passport number, or other similar identifiers)	First and last name; e-mail address; LinkedIn profile URL; MAC address, unique device identifier (UDID), or other Device ID; Internet Protocol (IP) address
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, without limitation, their name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance-policy number, education, employment, employment	First and last name; telephone number; e-mail address; LinkedIn profile URL; type of Device and other hardware information; MAC address, unique device identifier (UDID), or other Device ID; Internet Protocol (IP) address; operating system and other software information; type, version, and language of Internet browser; system settings; domain; mobile network information; Internet service

history, bank-account number, credit-card number, debit-card number, or any other financial information, medical information, or health-insurance information	provider; location and time zone; metadata stored on your Device
Internet or other electronic-network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Website, application, or advertisement)	Access times and dates for our Site; areas or pages viewed on our Site; time spent on a page on our Site; click through on our Site; clickstream data from our Site; queries made on our Site; search results selected on our Site; links clicked on our Site; text entered on our Site; mouse movements on our Site, other statistical information regarding use of our Site; metadata stored on your Device; information on the websites you viewed immediately before and/or after accessing our Site
Geolocation data	Location

2. HOW WE COLLECT INFORMATION

Information Provided to Us

We may collect personal data that has been provided to us willingly. The information we collect depends on how you use the Site. For example, when you submit information through our "Contact us" page, or send us an e-mail, we will collect your first and last name, telephone number, e-mail address, LinkedIn profile URL, location you are based in, as well as any other content included in your submission form and/or e-mail.

Under certain circumstances, you may be required to provide us with certain personal data necessary for compliance with applicable law or regulations, or to fulfill your contractual obligations with us. If you fail to provide us with any such required, personal data, then there may be negative consequences to you, including, without limitation, our inability to provide you with our products and services.

Other Information Collected by Us

When you use the Site, we may collect information about which features you used and how you used them, including, without limitation, access times and dates, areas or pages viewed, time spent on a page, click through, clickstream data, queries made, search results selected, links clicked, text entered, mouse movements, and other statistical information, as well as information on the websites you viewed immediately before and/or after accessing the Site. In addition, when you use the Site, depending on the settings of your computer or mobile device ("**Device**"), we may also automatically collect other information, including, without limitation, the type of Device you use and other hardware information; your MAC address, unique device identifier (UDID), or other Device ID; the IP address of your Device; your operating system and other software information; the type, version, and language of Internet browser you use; your mobile network information; your Internet service provider; the location and time zone in which the Device is located; and metadata stored on the Device. This information is collected automatically by our servers (which may be hosted by a third-party service provider) and other

IT systems, or through cookies and other data-collection tools. For more information about cookies, please see Section 3 below.

3. COOKIES AND OTHER DATA-COLLECTION TECHNOLOGIES

We may use cookies, web beacons, tracking pixels, and other data-collection or tracking technologies, to automatically collect personal data when you use the Site. “Cookies” are small files that a website places on your Device while you are viewing a website. We may use both “session cookies” (which expire once you close your Web browser) and “persistent cookies” (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Site. Persistent cookies can be removed by following your Internet browser’s help-file directions.

Data-collection technology helps us improve your experience of the Site by, for example, compiling statistics about the use of the Site; helping us analyze technical and navigational information about the Site and to detect and prevent fraud; ensuring the Site functions correctly; displaying information more effectively; remembering your preferences and settings; customizing content and offers; and for security, marketing, and other business purposes. We may use data-collection technology to collect information from the Device that you use to access the Site, such as your operating system type and other software information; browser type and version; domain; mobile network; IP address; Internet service provider; and other system settings; as well as the language your system uses, the country and time zone in which your Device is located, your access times and dates, and information on the websites you viewed immediately before and/or after accessing the Site.

We may utilize Google Analytics (including, without limitation, Remarketing, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and integrated services that require Google Analytics to collect data for advertising purposes, including, without limitation, the collection of data via advertising cookies and identifiers), and other, third-party vendors that use cookies and/or similar technologies, to collect and analyze information about the use of the Site and report on activities and trends. Our partners and affiliates may also use cookies and/or similar technologies to collect non-personally identifiable information about your activities on this Site and other websites, in order to provide you with targeted advertising based upon your interests. This means that these partners and affiliates may use cookies to show you ads based upon your previous visits to the Site. Together with our partners and affiliates, we may use these cookies and/or similar technologies to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services, are related to your visits to the Site.

For information on how Google collects and processes data, please visit <https://policies.google.com/technologies/partner-sites>.

You may be able to control, reject, or opt out of use of cookies and/or similar technologies in certain circumstances. Please see Section 15 below for more information.

Our Policy on “Do Not Track” Signals

Some web browsers (e.g., Safari, Microsoft Edge, Firefox, Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have their online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain personal data about the browser’s user. Not all browsers offer a DNT option, and there are currently no

commonly accepted standards for recognizing or responding to DNT signals. For this reason, many website operators, including Epipelagic, do not currently respond to DNT signals.

4. CHILDREN'S PRIVACY

Our website is intended for adults, not children. It is not our intent to collect the personal data of anyone under the age of 16, and we do not knowingly collect personal data from children under the age of 16 or utilize any plug-ins or ad networks that collect personal data through third-party websites or online services, which are directed at children under the age of 16. If you are a parent or guardian, and you learn that your child provided us with personal data, please contact us immediately. If we obtain actual knowledge that we have received any personal data of an individual under the age of 16, then we will take steps to delete such data. In addition, we do not knowingly allow any marketing or advertising, which is specifically targeted to anyone under the age of 18, and which is prohibited by Section 22580 of the California Business and Professions Code.

5. HOW WE USE YOUR INFORMATION

The information we collect from you may be used for any one or more of the following purposes, under the following legal bases:

Fulfillment of Services

- To provide you with and facilitate products and services you request from us, and to respond to questions and other requests for information from you.
- To meet contractual obligations.
- To process and collect payments for our products and services.

These are necessary (1) to fulfill our contractual obligations to you, and to take steps requested by you prior to our entering into a contract (e.g., to provide investment information); and (2) for our legitimate interests and/or those of a third party, including, without limitation, providing you the best possible service, developing and maintaining our relationship with you, establishing, exercising, and defending our legal claims and rights, and building and running our business.

Website Administration

- To administer our Site and services, and diagnose technical problems.
- To improve and personalize your experience with the Site, such as by personalizing content to your preferences or interests (e.g., language, font size, etc.), or by expediting the processing and completion of a transaction; and to allow you to navigate and browse through the Site quickly and efficiently.
- To send you administrative information and notifications (e.g., for security, support, or maintenance purposes), and to solicit input and feedback about our Site, products, services, or other aspects of our business.

These are necessary for our legitimate interests and/or those of a third party, including, without limitation, providing you the best possible service, maintaining our relationship with you, ensuring network and information security, ensuring and optimizing the functionality of the Site, and building and running our business.

Legal Compliance; Preventing Misconduct, Abuse, or Misuse

- To verify information provided to us.
- To perform external audits and quality checks.
- To protect the rights, property, and/or interests, of ourselves, our equity holders and/or business partners, and/or others, including, without limitation, in relation to enforcement

of our agreements, billing and collection for our products and services, ensuring the confidentiality of sensitive information, prosecuting or defending against legal or other claims (including, without limitation, to mitigate liability in an actual or threatened lawsuit), or any litigation, dispute resolution, or regulatory action.

- To investigate and remedy violations or potential violations of law, or of our policies or agreements; to prevent unauthorized access and modifications to our systems; or to investigate, detect, prevent, or take other action regarding illegal activity, suspected fraud, crime, or other wrongdoing.
- As we believe is required by law, regulation, or professional obligation, or required by any governmental body (including, without limitation, any arbitrator, grand jury, or self-regulatory organization), such as to screen for financial and other sanctions or embargoes, or to comply with a search warrant, subpoena, court order, government investigation, inquiry, audit, statutory return, or other legal requirement or other, valid, legal process.
- As we believe is advisable in response to a lawful request of any governmental body (including, without limitation, any arbitrator, grand jury, or self-regulatory organization), including, without limitation, for purposes of law enforcement or protecting national security.
- To otherwise address legal concerns or liabilities; to prevent harm or potential harm; or if we believe there is an emergency or other circumstance that justifies such usage.

These are necessary (1) to fulfill our contractual obligations to you; (2) to comply with our legal obligations; and (3) for our legitimate interests and/or those of a third party, including, without limitation, establishing, enforcing, and defending our legal rights and protecting the rights of third parties; detecting and preventing fraud, crime, and other misconduct or misuse; protecting public safety or national security; and protecting our reputation and business.

Business Management

- For our business purposes, such as to keep, update, and enhance our records (including, without limitation, of your contact information and correspondence); to perform research, data and statistical analysis, audits, or security-and-fraud monitoring and prevention; to consider applicants for employment; to enhance, improve, or change our Site, products, or services; to evaluate and develop our marketing or other business strategies; to identify usage trends; to ensure safe working practices, staff administration, and assessment; and for operational reasons, such as improving efficiency, training, and quality control.
- To generate aggregated, anonymized, and statistical information.
- As we believe is necessary or advisable in connection with or during negotiation of (i) any merger, or any sale, assignment, transfer, or other disposition, of all or any portion of our business, stock, or assets, including, without limitation, in the event of any corporate restructuring, or any other change of ownership or control; or (ii) any joint venture, acquisition, divestiture, financing, restructuring, reorganization, or dissolution, or any bankruptcy, insolvency, receivership, or the like.

These are necessary (1) to comply with our legal obligations; and (2) for our legitimate interests and/or those of a third party, including, without limitation, establishing, enforcing, and defending our legal rights and protecting the rights of third parties; providing you the best possible service; protecting and promoting our reputation; ensuring network and information security; ensuring and optimizing the functionality of the Site; developing and improving our products and services; and building and running our business.

Marketing and Promotions

- To verify your e-mail address; to send communications you have requested or that may be of interest to you based on your apparent preferences and interests; to call you by telephone for our business purposes, including, without limitation, as part of secondary fraud protection or, where permitted, to solicit your feedback; and to send you newsletters, surveys, offers, and other marketing/promotional information or materials, or invitations to events that we think may be of interest to you.

These are necessary for our legitimate interests and/or those of a third party, including, but not limited to developing and maintaining our relationship with you, promoting our reputation, and building and running our business. Where required by applicable law, we will obtain your consent before using the information we collect to send you such communications.

You have the right to opt out of receiving marketing and promotional communications at any time by contacting us at info@epipelagic.vc. We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in applicable laws or regulations, or the structure of our business.

Other

- To perform other functions as otherwise described at the time of collection, which are necessary to fulfill our contractual obligations to you, necessary to comply with our legal obligations, or necessary for our legitimate interests and/or those of a third party, or to which you consent.

6. DISCLOSURE OF YOUR INFORMATION

We do not sell, trade, or otherwise transfer your data to advertising networks. We may, however, share your personal data with other parties for marketing, advertising, or other uses, as follows:

To Affiliates

We may share some or all of your information with any parent company, subsidiaries, joint ventures, or other entities, which, directly or indirectly (including through one or more intermediaries), control, are controlled by, or are under common control with Epipelagic (“**Affiliates**”), for our and/or their business or other purposes, in which case we will require our Affiliates to honor this Privacy Policy.

To Third-Party Providers

We may share your data with our service providers, suppliers, subcontractors, insurers, brokers, banks, auditors, or other third parties who provide services to us or act on our behalf, including, without limitation, in order to

- provide you with the services that we offer you through the Site;
- conduct quality-assurance and data-security testing;
- provide technical support; or
- provide other security or administrative services to us.

These third-party service providers are required to not use your personal data other than to provide the services requested by Epipelagic. You may ask for information from us about our sharing of information to third parties (including our Affiliates) for their direct-marketing purposes, by contacting us at info@epipelagic.vc.

For Legal Compliance or Preventing Misconduct, Abuse, or Misuse

We may share your information with third parties, as we consider necessary or advisable, in our sole discretion,

- (i) to investigate and remedy violations or potential violations, of law or our policies or agreements; to prevent unauthorized access and modifications to our systems; or to investigate, detect, prevent, or take other action regarding illegal activity, suspected fraud, crime, or other wrongdoing;
- (ii) to comply with laws, regulations, professional obligations, or requirements of any governmental body (including, without limitation, any arbitrator, grand jury, or self-regulatory organization); screen for financial and other sanctions or embargoes; comply with search warrants, subpoenas, court orders, government investigations, inquiries, audits, statutory returns, or other legal requirements or other, valid, legal processes; or respond to lawful requests of any governmental body (including, without limitation, any arbitrator, grand jury, or self-regulatory organization), including, without limitation, for purposes of law enforcement or protecting national security;
- (iii) to protect the rights, property, and/or interests, of ourselves, our equity holders and/or business partners, and/or others, including, without limitation, in relation to enforcement of our agreements, billing and collection for our products and services, ensuring the confidentiality of sensitive information, prosecuting or defending against legal or other claims (including, without limitation, to mitigate liability in an actual or threatened lawsuit), or any litigation, dispute resolution, or regulatory action; or
- (iv) to otherwise address legal concerns or liabilities, to prevent harm or potential harm, or if we believe there is an emergency or other circumstance that justifies such disclosure.

For Corporate Transactions

We may share, transfer, and/or assign your information to third parties, in connection with or during negotiation of (i) any merger, or any sale, assignment, transfer, or other disposition, of all or any portion of our business, stock, or assets, including, without limitation, in the event of any corporate restructuring, or any other change of ownership or control; or (ii) any joint venture, acquisition, divestiture, financing, restructuring, reorganization, or dissolution, or any bankruptcy, insolvency, receivership, or the like.

With Your Consent or At Your Request

We may otherwise share your personal data with third parties after asking for and obtaining your consent, or at your request. Any such request for your consent to share your personal data with third parties will make clear why we want to share such personal data.

In addition, you should be aware that certain personal data may become public record when certain documents are filed with the federal or state governments, with a court or other governmental body, or with certain self-regulatory organizations. This Privacy Policy does not cover these, or any similar, third-party actions.

7. CATEGORIES OF PERSONAL DATA WE SOLD OR SHARED

We do not sell or share your personal data to third parties for purposes of advertising that is targeted based on your activities on third-party and distinctly branded digital platforms, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale or sharing.

8. CATEGORIES OF PERSONAL DATA WE DISCLOSED FOR A BUSINESS PURPOSE

In the preceding twelve (12) months, we have disclosed the following categories of personal data for a business purpose in accordance with Section 6 above:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, e-mail address, account name, Social Security number, driver's license number, passport number, or other similar identifiers).
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, without limitation, their name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance-policy number, education, employment, employment history, bank-account number, credit-card number, debit-card number, or any other financial information, medical information, or health-insurance information.
- Internet or other electronic-network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Website, application, or advertisement).
- Geolocation data.

9. SECURITY OF YOUR INFORMATION

We use physical, technical, and/or organizational measures designed to protect your information against unauthorized access, theft, and loss. We restrict access to your personal data to those employees who need to know that information to perform their job functions.

Although we take precautions intended to help protect the information that we process, no system or electronic data transmission is completely secure, and it is possible for the security of your personal data to be compromised, for example, during transmission, or from events or circumstances outside our reasonable control. Therefore, we cannot guarantee the security of your personal data, and cannot assume responsibility or liability for any unauthorized access. You should consider these risks carefully before sending personal data to us.

When disclosing any personal data, you should remain mindful of the fact that such information could potentially become available to the public and, consequently, could be collected and used by others without your consent. Accordingly, you should consider carefully before submitting sensitive information that you would not want disclosed to the public, and should recognize that your use of the Internet, and our Site and services, is solely at your risk. Ultimately, you are responsible for maintaining the secrecy of your personal data.

ACCORDINGLY, WE DISCLAIM ALL LIABILITY FOR THE THEFT, LOSS, OR INTERCEPTION OF, OR UNAUTHORIZED ACCESS OR DAMAGE TO, YOUR DATA OR COMMUNICATIONS, BY USING THIS SITE OR OUR PRODUCTS OR SERVICES. BY SENDING SUCH INFORMATION TO US, YOU ACKNOWLEDGE THAT YOU FULLY UNDERSTAND AND ASSUME THESE RISKS.

IF YOU BELIEVE YOUR PRIVACY HAS BEEN BREACHED THROUGH USE OF OUR SITE OR OUR PRODUCTS OR SERVICES, THEN PLEASE CONTACT US IMMEDIATELY AT INFO@EPIPELAGIC.VC.

10. RETENTION OF PERSONAL DATA

We will retain your personal data for the period we deem necessary to fulfill the purposes outlined in this Privacy Policy, including, without limitation, to complete any transaction that you began before asking us to change or delete your information; respond to any questions, complaints, or claims, made by you or on your behalf; show that we treated you fairly; comply with a legal request; resolve a dispute; enforce an agreement; or keep records required by law; unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include, without limitation,

- the length of time we have an ongoing relationship with you (for example, for as long as you keep using the Site);
- whether a legal obligation to which we are subject applies (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and
- whether retention is advisable and considering our legal position (such as for statutes of limitations, litigation or other disputes, legal requests, or regulatory investigations).

In addition, it is likely that residual information may remain within our databases, back-ups, or other records, which may not be removed until such databases, back-ups, or other records, are permanently wiped or destroyed in accordance with our standard retention practices.

11. LINKS OR CITATIONS TO OTHER WEBSITES AND SERVICES

The Site may include links or citations to third-party websites and services that are not operated by us. When you click any such links, you are directed away from the Site. A link or citation to a third-party website or service does not mean that we are affiliated with such third party, or endorse such third party or its website or service, the quality or accuracy of the information presented on such website or service, or such third party's privacy policies or practices.

If you decide to visit a third-party website or service, you are subject to such third party's privacy practices and policies, not ours—this Privacy Policy does not apply to any personal data that you provide to these other websites and services. We do not exercise control over any such third parties, and have not reviewed the privacy practices or policies of any such third parties. Such third parties may collect and share data about you, and may have different privacy practices or policies from ours. Consequently, we strongly encourage you to carefully review such third party's privacy policies before visiting their website or using their service.

12. RIGHTS OF CALIFORNIA RESIDENTS UNDER THE CCPA/CPRA

If you are a resident of the State of California, then you have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data-protection laws, as applicable, to exercise the following rights free of charge:

Right to Know and Access Personal Data We Collect About You	You have the right to know, and request disclosure of <ul style="list-style-type: none">• the categories of personal data we have collected about you, including, without limitation, sensitive personal data;• the categories of sources from which the personal data is collected;
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	<ul style="list-style-type: none"> • our business or commercial purpose for collecting, selling, or sharing personal data; • the categories of third parties to whom we disclose personal data, if any; and • the specific pieces of personal data we have collected about you. <p>Please note, however, that we are not required to</p> <ul style="list-style-type: none"> • retain any personal data about you that was collected for a single, one-time transaction if, in the ordinary course of business, that information about you is not retained; • reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal data; or • provide the personal data to you more than twice in a twelve (12)-month period.
Right to Know What Information is Sold, Shared, or Disclosed for a Business Purpose	<p>In connection with any personal data we may sell, share, or disclose to a third party for a business purpose, you have the right to know</p> <ul style="list-style-type: none"> • the categories of personal data about you that we sold or shared, and the categories of third parties to whom the personal data was sold or shared; and • the categories of personal data that we disclosed about you for a business purpose, and the categories of persons to whom the personal data was disclosed for a business purpose. <p>You have the right to opt out of any sale of your personal data or sharing of your personal data for targeted behavioral advertising. If you exercise your right to opt out of the sale or sharing of your personal data, we will refrain from selling or sharing your personal data, unless you subsequently provide express authorization for the sale or sharing of your personal data. We do not currently sell or share any personal data.</p>
Right to Limit Use of Sensitive Personal Information	<p>You have the right to limit the use and disclosure of your sensitive personal data to the use that is necessary for the following:</p> <ul style="list-style-type: none"> • To perform the services or provide the goods reasonably expected by an average

	<p>consumer who requests those goods or services.</p> <ul style="list-style-type: none"> • To perform the following services: <ol style="list-style-type: none"> (1) Helping to ensure security and integrity, to the extent the use of your personal data is reasonably necessary and proportionate for these purposes. (2) Short-term, transient use, including, without limitation, non-personalized advertising shown as part of your current interaction with us, if your personal data is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us. (3) Performing services on our behalf, including, without limitation, maintaining or servicing accounts, providing you service, processing or fulfilling orders and transactions, verifying your information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf. (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us. • As authorized by further regulations. <p>You have a right to know if your sensitive personal data may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p>
Right to Deletion	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will</p> <ul style="list-style-type: none"> • delete your personal data from our records; • direct any service providers or contractors to delete your personal data from their record; and • direct any third parties to whom we have sold or shared your personal data to delete your personal data, unless this proves impossible or involves disproportionate effort. <p>Please note that we may not delete your personal data if it is reasonably necessary to</p>

	<ul style="list-style-type: none"> • complete the transaction for which the personal data was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us; • help to ensure security and integrity, to the extent the use of your personal data is reasonably necessary and proportionate for those purposes; • debug to identify and repair errors that impair existing intended functionality; • exercise free speech, ensure the right of another person to exercise their right of free speech, or exercise another right provided for by law; • comply with the California Electronic Communications Privacy Act; • engage in public or peer-reviewed scientific, historical, or statistical research in the public interest, which adheres to all other applicable ethics and privacy laws, when our deletion of the data is likely to render impossible or seriously impair the achievement of such research, so long as we have obtained your informed consent; • enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; • comply with an existing legal obligation; or • otherwise use your personal data, internally, in a lawful manner that is compatible with the context in which you provided the information.
Right of Correction	<p>If we maintain inaccurate personal data about you, then you have the right to request us to correct that inaccurate personal data. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal data.</p>
Right of No Retaliation	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things,</p> <ul style="list-style-type: none"> • deny goods or services to you; • charge different prices or rates for goods or services, including, without limitation, through

	<p>the use of discounts or other benefits, or imposing penalties;</p> <ul style="list-style-type: none"> • provide a different level or quality of goods or services to you; or • suggest that you will receive a different price or rate for goods or services, or a different level or quality of goods or services. <p>Please note, however, that we may charge a different price or rate, or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal data. We may also offer loyalty, rewards, premium features, discounts, or club-card programs consistent with these rights, or payments as compensation, for the collection of personal data, the sale of personal data, or the retention of personal data.</p>
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13. YOUR CHOICES REGARDING MARKETING COMMUNICATIONS

When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out,” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly at info@epipelagic.vc. Please note, however, that even if you opt out of marketing communications from us, we may still send you administrative, service-related, and/or other non-marketing communications.

In addition, if you are a resident of the State of California, then you may also opt out of disclosure of your personal data to third parties for their direct-marketing purposes, by contacting us at info@epipelagic.vc.

14. YOUR CHOICES REGARDING YOUR PERSONAL DATA

Data Deletion

You may request that we delete any personal data we have on you by contacting us via e-mail at info@epipelagic.vc or via mail to Attention: Privacy Team, Epipelagic Ventures, One Broadway, Unit 15-100, Cambridge, MA 02142-1100, USA.

Exercise of Rights

If you would like to exercise any rights you may have in regard to your personal data, including, without limitation, to review, correct, update, restrict, or delete personal data that you have previously provided to us, or to receive an electronic copy of your personal data for purposes of transmitting it to another company, then please contact us via e-mail at info@epipelagic.vc or via mail to Attention: Privacy Team, Epipelagic Ventures, One Broadway, Unit 15-100, Cambridge, MA 02142-1100, USA.

In your request, please provide sufficient information for us to identify you, and make clear what personal data you would like to obtain or have changed, whether you would like to have your

personal data deleted or suppressed, or other limitations you would like to put on our use of your personal data.

Verification; Refusal of Request

For your protection, we may need to verify your identity before carrying out any request related to your personal data. Any personal data we collect from you to verify your identity in connection with your request will be used solely for the purposes of verifying your identity. We are not obligated to make a data-access or data-portability disclosure if we cannot verify that the person making the request is the person about whom we collected data or is someone authorized to act on such person's behalf.

Please note that we reserve the right to refuse to act on any request that we consider manifestly unfounded or excessive (for example, because it is repetitive, requires disproportionate or commercially unreasonable efforts, or risks the privacy of others), and/or to charge a fee that takes into account the administrative and other costs for taking any such action you request.

In addition, please note that we may also refuse any request

- (a) if we believe we are required to keep your information (including, without limitation, for a certain time period) by any law, regulation, professional obligation, or other legal requirement or process;
- (b) if required or lawfully requested by any governmental body (including, without limitation, any arbitrator, grand jury, or self-regulatory organization), including, without limitation, for purposes of law enforcement or protecting national security;
- (c) if we believe keeping your information is necessary or advisable to protect the rights, property, and/or interests, of ourselves, our equity holders and/or business partners, and/or others, including, without limitation, in relation to enforcement of our agreements; billing and collection for our products and services; ensuring the confidentiality of sensitive information; prosecuting or defending against legal or other claims (including, without limitation, to mitigate liability in an actual or threatened lawsuit); any litigation, dispute resolution, or regulatory action; or to otherwise address legal concerns or liabilities, or prevent harm or potential harm to others; or
- (d) for other reasons allowed under applicable law.

15. YOUR CHOICES REGARDING COOKIES

You may be able to control, reject, or delete cookies from the Site through your web browser, or to have your browser alert you when a cookie is placed on your Device. Please refer to the technical information for your specific web browser for instructions on managing cookies. You may also opt out of the use of cookies by certain third-party vendors by visiting the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), [TrustArc](#), and [Adobe](#).

You can opt out of Google's use of cookies by visiting Google's Ads Settings, currently available at <https://myadcenter.google.com/>. You can also prevent Google Analytics from using your data by downloading and installing the Google Analytics Opt-out Browser Add-on, currently available at <https://tools.google.com/dlpage/gaoptout>.

In addition, you may be able to opt out of interest-based advertising on your mobile device. Instructions for how to opt out in the most popular mobile operating systems is currently

available at <https://thenai.org/opt-out/mobile-opt-out/>. Certain apps for opting out may also be available, such as the [AppChoices](#) app. You also may be able to reject mobile device identifiers by activating the appropriate setting on your Device.

Please note, however, that blocking or disabling cookies or Device identifiers may prevent you from accessing all of the features available through the Site, or otherwise adversely interfere with the functionality of the Site.

16. ONLINE PRIVACY POLICY ONLY; INTERPRETATION

This Privacy Policy applies only to information collected through the Site, not to information that may be collected through other means.

The headings in this Privacy Policy are for convenience of reference only, and will not affect the meaning or interpretation hereof. The English-language version of this Privacy Policy controls in the event of any conflict with a non-English-language version.

17. CHANGES TO THIS PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy from time to time, and for any reason. The effective date at the beginning of this Privacy Policy indicates when this Privacy Policy was last revised. If we make any material changes to this Privacy Policy, then we will post the new Privacy Policy here, and update its effective date. If we make any material changes to this Privacy Policy, then we will post the new Privacy Policy here, update its effective date, and notify you of such update to give you the opportunity to review such changes. Your use of the Site after the effective date of any such changes will be deemed to be your acceptance of this Privacy Policy as revised.

18. CONTACT INFORMATION

If, at any time, you believe that we have not adhered to this Privacy Policy, if you would like this Privacy Policy in another format (e.g., audio, large print, braille), or if you have any questions about this Privacy Policy, then please contact us at:

Attention: Privacy Team
Epipelagic Ventures
One Broadway, Unit 15-100
Cambridge, MA 02142-1100
USA
info@epipelagic.vc