

# Privacy Policy

Effective as of January 1, 2023.

This Privacy Policy describes how Northpond Ventures, LLC ("Northpond Ventures," "we", "us" or "our") handles personal information that we collect through our website at <https://www.npv.vc/> and any other digital properties that link to this Privacy Policy (collectively, the "Service"), as well as through other activities described in this Privacy Policy.

**California residents:** See our [Notice to California residents](#) for information about your personal information and privacy rights.

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## Personal information we collect

**Information you provide to us.** Personal information you may provide to us through the Service or otherwise includes:

- **Contact data.** Your first and last name, email address, mailing addresses, professional title and company name, phone number and other contact details.
- **Company data.** Any information about you, your colleagues or your company that you share with us in relation to investments or potential investments in your company by the funds we manage, such as your and colleagues' professional and educational backgrounds.
- **Communications data.** Information in your communications with us, including when you contact us through the Service, social media, events, or otherwise.
- **Marketing data,** such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Business contacts** who send us information about entrepreneurs or candidates for jobs with our portfolio companies.
- **Publicly available sources**, such as social media platforms and other publicly available sources.

**Automatic data collection.** We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages you viewed, how long you spent on a page, the website you visited before browsing to the Service, navigation paths between pages, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

**Cookies and similar technologies.** Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users’ web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both “session cookies” that are deleted when a session ends, “persistent cookies” that remain longer, “first party” cookies that we place and “third party” cookies that our third-party business partners and service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

## How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery and business operations.** We may use your personal information to:

- provide, operate and improve the Service and our business;
- explore business opportunities and execute transactions, including our investments in companies and investments in the funds we manage;
- promote and host events;
- help our portfolio companies explore business opportunities and recruit and evaluate job candidates;
- provide support for the Service, and respond to your requests, questions, and feedback; and
- communicate with you about any of the above or other matters.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Marketing.** We and our service providers may collect and use your personal information to send you direct marketing communications. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**Cookies and similar technologies.** In addition to the other uses included in this section, we may use the [Cookies and similar technologies](#) described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service.
- **Functionality.** To enhance the performance and functionality of our Service.
- **Analytics.** To help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails. For example, we use Google Analytics for this purpose. You can learn more about Google Analytics and how to prevent the use of Google Analytics relating to your use of our sites here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

## How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

**Affiliates.** Our subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

**Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, and email delivery).

**Portfolio companies.** We may share personal information about job candidates and other business contacts with portfolio companies with whom we are collaborating to assist those companies with their business and recruiting activities.

**Investors.** We may share with investors and prospective investors in our funds bios and other information about the founders and key personnel of our portfolio companies.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations of or due diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, our or our affiliates (including, in connection with a bankruptcy or similar proceedings).

## Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California can find additional information about their rights below.

**Opt-out of marketing communications.** You may opt-out of promotional emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of promotional emails, you may continue to receive service-related and other non-marketing emails.

**Cookies.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). You can also configure your device to prevent images from loading to prevent web beacons from functioning.

**Do Not Track.** Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track”. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

## Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

## Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users in the United Kingdom and the European Economic Area should read the important information provided below about transfer of personal information outside of the European Union.

## Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledgment that the modified Privacy Policy applies to your interactions with the Service and our business.

## How to contact us

If you have questions or concerns about this Privacy Policy or our practices, please contact us at:

Northpond Ventures, LLC  
7500 Old Georgetown Road, Suite 850  
Bethesda, Maryland 20814  
[privacy@npv.vc](mailto:privacy@npv.vc)

## Notice to California residents

This notice describes our collection, use and disclosure of personal information of California residents in our capacity as a "business" under the California Consumer Privacy Act ("CCPA") and their rights with respect to their personal information. For purposes of this notice, "personal information" has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA.

**Your privacy rights.** As a California resident, you have the following rights under the CCPA:

- **Right to know.** You can request information about the categories of personal information that we have collected; the categories of sources from which we collected personal information; the business or commercial purpose for collecting, sharing and/or selling personal information; the categories of any personal information that we sold or disclosed for a business purpose; and the

categories of any third parties with whom personal information was sold, shared or disclosed for a business purpose.

- **Right to access.** You can request a copy of personal information that we have collected about you.
- **Right to deletion.** You can request that we delete personal information that we collected from you.
- **Right to correction.** You can request that we correct inaccurate personal information that we have collected about you.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

**Identity verification.** You may submit requests to exercise your right to know, access, deletion and correction via email to [privacy@npv.vc](mailto:privacy@npv.vc). The rights described above are not absolute, and in certain cases, we may decline your request as permitted by law. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

**Authorized agents.** We need to verify your identity to process your requests to exercise your rights to know, access, deletion, and correction, and we reserve the right to confirm your California residency. To verify your identity, we may require you to log into an online account if you have one, provide identifiers we can match against information we may have collected from you previously, confirm your request using the email or telephone account stated in the request, provide government identification, or provide a declaration under penalty of perjury, where permitted by law.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to applicable state law. If you have not provided your agent with such a power of attorney, we may ask you and/or your agent to take additional steps permitted by law to verify that your request is authorized, such as information required to verify your identity and that you have given the authorized agent permission to submit the request.

**Information practices.** The following describes our practices currently and during the past 12 months:

- **Sources and purposes.** We collect all categories of personal information from [the sources](#) and use them for the business/commercial [purposes](#) described above in the Privacy Policy.
- **Sales and sharing of personal information.** We do not "sell" or "share" personal information as those terms are defined in the CCPA and have no actual knowledge that we have sold or shared the personal information of California residents under 16 years of age.
- **Sensitive personal information.** We do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.
- **Deidentification.** We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.
- **Retention.** The criteria for deciding how long to retain personal information is generally based on whether such period is sufficient to fulfill the purposes for which we collected it as described in this notice, including complying with our legal obligations.
- **Collection and disclosure.** The chart below describes the personal information we collect by reference to the categories of personal information specified in the CCPA (Cal. Civ. Code §1798.140), and the categories of third parties to whom we disclose it. The terms in the chart

refer to the categories of information and third parties described above in this Privacy Policy in more detail. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below. We may also disclose personal information to professional advisors, authorities and others, and business transferees as described above in the [How we share your personal information](#) section of this Privacy Policy.

Statutory category/personal information we collect	Categories of third parties to whom we disclose the personal information for a business purpose
<b><u>Identifiers</u></b> <ul style="list-style-type: none"> <li>• <a href="#">Contact data</a></li> <li>• <a href="#">Company data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> <li>• <a href="#">Portfolio companies</a></li> <li>• <a href="#">Investors</a></li> </ul>
<b><u>Identifiers (online)</u></b> <ul style="list-style-type: none"> <li>• <a href="#">Device data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> </ul>
<b><u>California Customer Records</u></b> (as defined in California Civil Code §1798.80) <ul style="list-style-type: none"> <li>• <a href="#">Contact data</a></li> <li>• <a href="#">Company data</a></li> <li>• <a href="#">Communications data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> <li>• <a href="#">Portfolio companies</a></li> <li>• <a href="#">Investors</a></li> </ul>
<b><u>Commercial Information</u></b> <ul style="list-style-type: none"> <li>• <a href="#">Contact data</a></li> <li>• <a href="#">Company data</a></li> <li>• <a href="#">Marketing data</a></li> <li>• <a href="#">Online activity data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> <li>• <a href="#">Portfolio companies</a></li> <li>• <a href="#">Investors</a></li> </ul>
<b><u>Internet or Network Information</u></b> <ul style="list-style-type: none"> <li>• <a href="#">Device data</a></li> <li>• <a href="#">Online activity data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> </ul>
<b><u>Professional or Employment Information</u></b> <ul style="list-style-type: none"> <li>• <a href="#">Company data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> <li>• <a href="#">Portfolio companies</a></li> <li>• <a href="#">Investors</a></li> </ul>
<b><u>Education Information</u></b> <ul style="list-style-type: none"> <li>• <a href="#">Company data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> <li>• <a href="#">Portfolio companies</a></li> <li>• <a href="#">Investors</a></li> </ul>
<b><u>Inferences</u></b> May be derived from: <ul style="list-style-type: none"> <li>• <a href="#">Contact data</a></li> <li>• <a href="#">Company data</a></li> <li>• <a href="#">Marketing data</a></li> <li>• <a href="#">Online activity data</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> <li>• <a href="#">Service providers</a></li> <li>• <a href="#">Portfolio companies</a></li> <li>• <a href="#">Investors</a></li> </ul>
<b><u>Protected Classification Characteristics</u></b>	<ul style="list-style-type: none"> <li>• <a href="#">Affiliates</a></li> </ul>

<p>May be included or revealed in:</p> <ul style="list-style-type: none"><li>• <a href="#">Contact data</a></li><li>• <a href="#">Company data</a></li></ul>	<ul style="list-style-type: none"><li>• <a href="#">Service providers</a></li><li>• <a href="#">Portfolio companies</a></li><li>• <a href="#">Investors</a></li></ul>
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