

Privacy Policy

Effective as of December 2, 2022.

This Privacy Policy describes how GV Management Company, L.L.C. and GV UK Management Company Limited (collectively, "GV," "we," "us," or "our") handles personal information that we collect through our website at <https://www.gv.com/> and any other digital properties or locations that links 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.

Individuals in the EEA/UK: See our [EEA/UK notice](#) for information about your personal information and data protection 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.

- **Event registration data.** Information you provide when you register for or attend in-person or online events that we host or co-host.
- **Job candidacy data.** Information about your candidacy for a job at one of our portfolio companies, such as your professional and educational background.
- **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. Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our [Cookie Notice](#). We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.

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, including to explore new investment opportunities, manage our existing portfolio, and develop and maintain our contacts and recruit staff;
- explore business opportunities, conduct due diligence 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.

Marketing. We, 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.

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.

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 personal information with investors and prospective investors in our funds bios and other information about the founders and key personnel of our portfolio companies.

Event co-sponsors and marketing partners. We may share personal information with third parties with whom we co-sponsor events and marketing partners.

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, GV (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, the United Kingdom and the European Economic Area 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. For information about cookies employed by the Service and how to control them, see our [Cookie Notice](#).

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” signals. 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 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 have offices in the United States and the United Kingdom 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 the transfer of personal information outside of the European Union.

GV has certified to the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework (“**Privacy Shield Frameworks**”) as set forth by the U.S. Department of Commerce. If there is any conflict between this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit: <https://www.privacyshield.gov/>. Although GV has certified to the Privacy Shield Frameworks, GV does not rely on the Privacy Shield Frameworks as a legal basis for transfers of personal information

from the EU to third countries in light of the recent decisions by the Court of Justice of the EU and the Swiss Federal Data Protection and Information Commissioner. GV utilizes legally recognized mechanisms to facilitate the transfer of personal information from the European Union and Switzerland to the United States and other third countries.

GV is committed to cooperating with the EU DPA panel established by the EU data protection authorities (“**EU DPA Panel**”) and the Swiss Federal Data Protection and Information Commissioner (as applicable) and complying with the advice given by the EU DPA Panel and/or the Swiss Federal Data Protection and Information Commissioner (as applicable) with regard to human resources data transferred from the EU and/or Switzerland to GV Management Company, L.L.C. within the context of an employment relationship.

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:

GV Management Company, L.L.C.
1600 Amphitheatre Pkwy,
Mountain View, CA 94043
privacy@gv.com

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 certain 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 to privacy@gv.com. 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.

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.
- **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, law enforcement and government authorities, 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
Identifiers <ul style="list-style-type: none"> • Contact data • Company data • Job candidacy data • Event registration data 	<ul style="list-style-type: none"> • Service providers • Portfolio companies • Investors
Identifiers (online) <ul style="list-style-type: none"> • Device data 	<ul style="list-style-type: none"> • Service providers
California Customer Records (as defined in California Civil Code §1798.80) <ul style="list-style-type: none"> • Contact data • Company data • Job candidacy data 	<ul style="list-style-type: none"> • Service providers • Portfolio companies • Investors

<ul style="list-style-type: none"> • Event registration data • Communications data • 	
<p>Commercial Information</p> <ul style="list-style-type: none"> • Contact data • Company data • Job candidacy data • Event registration data • Online activity data 	<ul style="list-style-type: none"> • Service providers • Portfolio companies • Investors
<p>Internet or Network Information</p> <ul style="list-style-type: none"> • Device data • Online activity data 	<ul style="list-style-type: none"> • Service providers
<p>Professional or Employment Information</p> <ul style="list-style-type: none"> • Company data • Job candidacy data 	<ul style="list-style-type: none"> • Service providers • Portfolio companies
<p>Education Information</p> <ul style="list-style-type: none"> • Company data • Job candidacy data 	<ul style="list-style-type: none"> • Service providers • Portfolio companies
<p>Inferences May be derived from:</p> <ul style="list-style-type: none"> • Contact data • Company data • Event registration data • Online activity data 	<ul style="list-style-type: none"> • Service providers • Portfolio companies • Investors
<p>Protected Classification Characteristics May be included or revealed in:</p> <ul style="list-style-type: none"> • Contact data • Company data • Job candidacy data 	<ul style="list-style-type: none"> • Service providers • Portfolio companies • Investors

EEA/UK notice

Our legal basis for processing your personal information

If UK data protection law applies to our processing of your personal information, it is important that you know the lawful basis on which we process your personal information.

We rely on the following legal basis, under UK data protection law, to process your personal information:

- Where we have obtained your consent, for example to action a request from you or respond to your specific query. You can withdraw your consent at any time, but we may still need to retain a record of your correspondence with us.
- Where it is necessary for the purposes of our legitimate interests to manage our existing investments and explore new investment opportunities, including conducting legal and commercial due diligence.

- Where it is necessary to comply with a legal obligation, for example under anti-money laundering or anti-bribery legislation.

Enforcement

GV may be required to share your personal information, including the disclosure of EU and Swiss personal information, to public authorities and law enforcement agencies in response to lawful requests, including requests to meet national security and law enforcement requirements.

Right to access, update and delete your personal information

If you are a resident of the UK and/or your personal information is processed in the context of our UK office, you have certain legal rights in respect of the personal information about you held by us. This includes the right to obtain a copy of this information on request, and the right to correct, amend or delete such personal information or object to it being used for certain purposes (including marketing). We may ask you to verify your identity before we can act on your request.

We will comply with any requests to exercise your rights in accordance with applicable law, and so there may be circumstances where we are entitled to refuse your request. For example, where permitted to by law, we may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so free of charge, except where it would require a disproportionate effort (where we are permitted to charge a fee under applicable law). We aim to maintain any information we hold and our Site in a manner that protects information from accidental or malicious destruction.

To make any requests regarding your personal information, or if you have any questions or concerns regarding your personal information, you should contact us at privacy@gv.com. You are also entitled to contact your local supervisory authority for data protection. In the UK, the data protection authority is the Information Commissioner's Office.

Right to object

You have the right to object (opt-out) of your personal information being used for purposes which are materially different to the purposes for which it was collected, as described in this Privacy Policy (including being disclosed to a third party). We may refuse your request where we have a right to do so (for example, if the use is necessary to comply with a legal obligation). To exercise any of your rights, please contact us at privacy@gv.com.

Contacting us

Please submit any questions, concerns or comments you have about this Privacy Policy or any requests concerning your personal information by email to privacy@gv.com.

For the purposes of UK data protection law, GV UK Management Limited is the data controller of your personal information. Our address in the UK is 146-148 Clerkenwell Road, London, EC1R 5DG.

Cookie Notice

This Cookie Notice explains how GV Management Company, L.L.C. and GV UK Management Company Limited (collectively, "GV," "we," "us," or "our") uses cookies and similar technologies in connection with the <https://www.gv.com/> website and any other website that we own or control and which posts or links to this Cookie Notice (collectively, the "Sites").

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third-party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third-party cookies can be used for a variety of purposes, including site analytics.

What types of cookies and similar tracking technologies do we use on the Sites?

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

Type	Description	Who serves the cookies (link to privacy policy/site)	How to control them
<i>Advertising</i>	These cookies are used by advertising companies to collect information about how you use our Sites and other websites over time. These companies use this information to show you ads they believe will be relevant to you within our services and elsewhere, and to measure how the ads perform.	None.	N/A
<i>Analytics</i>	These cookies help us understand how our services is performing and being used. These cookies may work with web beacons included in emails we send to track which emails are opened	Google Analytics	You can find out more information about Google Analytics cookies here and about how Google protects your data here . You can prevent the use of Google Analytics relating to your use of our

Type	Description	Who serves the cookies (link to privacy policy/site)	How to control them
	and which links are clicked by recipients.		Sites by downloading and installing a browser plugin available here . See 'your choices' below.
<i>Essential</i>	These cookies are necessary to allow the technical operation of our services (e.g., they enable you to move around on a website and to use its features).	None.	N/A
<i>Functionality / performance</i>	Enhance the performance and functionality of our services.	None.	N/A
<i>Social</i>	These cookies may allow you to log into the Sites or App through your social media account or share content in our sites that you find interesting through third-party social media providers. These cookies may also be used for advertising purposes.	None.	N/A

Your choices

Your options for controlling what information cookies and similar technologies collect about you include:

- **Blocking cookies in your browser.** 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 Sites may not work properly. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org. If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.
- **Blocking images/clear gifs:** Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

For more information about cookies, including how to see what cookies have been set on your computer

or mobile device and how to manage and delete them, visit www.allaboutcookies.org. If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

For more information about how we collect, use and share your information, see our [Privacy Policy](#).

Changes

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

Questions

If you have any questions about this Cookie Notice, please contact us by email at privacy@gv.com.

Last modified December 2, 2022.