

Privacy Policy

Effective as of December 5, 2017

Amended December 26, 2018

This is the privacy policy ("Privacy Policy") for information collected by CapitalG Management Company LLC ("CapitalG") and for <https://www.capitalg.com/> ("Site"). As of the effective date of this policy, this policy will be the sole privacy policy that applies to CapitalG.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep this policy as simple as possible but if you have any questions, please feel free to [contact us](#).

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Information that we collect

We collect information to provide you better services. We collect information in the following ways:

Information you give us

For example, information that you provide to us when contacting us for inquiries about potential investment or other commercial opportunities or employment details if you send us a CV, resumé or other details of your employment history in connection with an advertised job vacancy or a general inquiry regarding employment opportunities with us. When you do, we may ask for personal information, like your name, email address, telephone number and other details.

Information we get from your use of our Site

The Site is operated by or on behalf of CapitalG. We may collect information about the parts of the Site that you use and how you use it. This information includes:

- Device information

We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).

- Log information

When you use our Site, we may automatically collect and store certain information in server logs. This may include:

- details of how you used our Site
- Internet protocol address
- device event information, such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL
- cookies that may uniquely identify your browser
- Location information

We may collect and process information about your actual location and use various technologies to determine location, including IP address.

- Local storage

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

- Cookies and similar technologies

To improve your user experience, we may use various technologies to collect and store information when you visit our Site, and this may include using cookies or similar technologies to identify your browser or device. You may set your browser to block all cookies, including cookies associated with this Site or to indicate when a cookie is being set by us. However, some website features or services may not function properly without cookies.

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. Other technologies are used for similar purposes as a cookie on other platforms where cookies are not available or applicable. Our Site sets cookies that last for varying times. Some last only for the duration of your web session and expire when you close your browser or exit the Site. Other cookies are used to remember you when you return to the Site and will last longer.

Some of the cookies used by the Site are set by us, and some are set by third parties who are delivering services on our behalf. For example, we use the tracking technologies of Google Analytics. Google Analytics uses cookies to help website owners measure how users interact with website content. Detailed information regarding how Google Analytics uses cookies can be found [here](#).

Information we get from third parties

We may also get third party information such as candidate information to recruit talent, market or industry data to help us evaluate investment opportunities or other commercial data to facilitate normal course of business operations.

How we use information that we collect

We use the information we collect to provide, maintain, protect and improve our Site; carry out due diligence for our business purposes; evaluate and monitor investments; help our portfolio companies grow their businesses; or to recruit and hire talent.

When you [contact us](#), we keep a record of your communication to help solve any issues you might be facing with our Site or this Privacy Policy.

We may use information collected from cookies and/or other technologies to:

- facilitate your use of and improve overall quality of our Site and your user experience;
- remember that you have visited us before. This means we can identify the number of unique visitors we receive;
- customise elements of the promotional layout and/or content of the pages of the Site; and
- collect anonymous statistical information about how you use the Site, so that we can improve the Site.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

Transfer of personal information

Your personal information may be processed on servers located outside the country where you live, including outside the European Economic Area (EEA). Where personal information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that it is subject to appropriate safeguards and that it is treated securely and in accordance with this Privacy Policy.

Adhesion to the Privacy Shield Frameworks

CapitalG adheres to the Privacy Shield Principles. We comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Framework, please visit <https://www.privacyshield.gov/>.

Accountability for onward transfers

We are responsible and remain liable for the processing of personal information we receive, under the Privacy Shield Framework, and subsequently transfer to a third party acting as an agent on our behalf. We comply with the Privacy Shield Principles for all onward transfers of personal information from the EU, including the onward transfer liability provisions.

With respect to personal information received or transferred pursuant to the Privacy Shield Framework, we are subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

The choices we offer, including how to access and update information

Resolution of Privacy Shield queries and complaint mechanism

In compliance with the Privacy Shield Principles, we commit to resolve complaints about our collection or use of your personal information. European Economic Area individuals with inquiries or complaints regarding our Privacy Shield policy should first [contact us](#). We have further committed to refer unresolved Privacy Shield complaints to JAMS. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit <https://www.jamsadr.com/eu-us-privacy-shield>. The services of JAMS are provided at no cost to you. As further explained in the Privacy Shield Principles, a binding arbitration option may also be made available to you in order to address residual complaints not resolved by any other means.

Privacy Shield enforcement

CapitalG is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. CapitalG may be required to share your personal information, including the disclosure of EU 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 of Access and updating your personal information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

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 for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

Information that we share

We do not share personal information with companies, organisations and individuals outside of CapitalG unless one of the following circumstances applies:

- With your consent

We may share personal information with companies, organisations or individuals outside CapitalG when we have your consent to do so.

- For external processing

We may provide personal information to our affiliates or other trusted businesses or persons to process it for us (or for similar reasons), based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- For legal reasons

We may share personal information with companies, organisations or individuals outside

CapitalG if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request
- enforce applicable terms of service, including investigation of potential violations
- detect, prevent or otherwise address fraud, security or technical issues
- protect against harm to the rights, property or safety of CapitalG, our users or the public, as required or permitted by law

Information security

We work hard to protect our Site and any information that we hold from unauthorized access or unauthorized alteration, disclosure or destruction. In particular:

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems
- We restrict access to personal information to CapitalG employees, contractors, service providers and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations

When this Privacy Policy applies

Our Privacy Policy applies to all of the services offered and businesses operated by CapitalG. This Policy does not apply to information practices, services offered or businesses operated by other companies or individuals whose privacy policies do not incorporate this Privacy Policy.

Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any Privacy Policy changes on this page and, if deemed necessary, we will provide a more prominent notice. We will also keep prior versions of this Privacy Policy in an archive for your review.

Contacting us

Please submit any questions, concerns or comments you have about this Privacy Policy or any requests concerning your personal information by completing [this form](#).