
RiverVest Privacy Policy

Last Updated: 3-30-2020

RiverVest Venture Management LLC (“RiverVest,” “we,” “our”) respects your privacy and is committed to protecting your personal information. This Privacy Policy applies to U.S. residents and informs you about how we collect, use and share personal information when you visit our website, rivervest.com, and the related mobile application, or any website or application owned, operated, licensed, or controlled by RiverVest (referred to in this Privacy Policy collectively as the “Site”), as well as information that we collect through other means about people who contact us, vendors, and prospective investors and prospective employees. The Privacy Policy also tells you about your rights and choices with respect to your personal information.

If you are a RiverVest investor or a representative of an investor, please also see our investor privacy notice for additional information about our collection, use, and sharing practices with respect to investor information.

This Privacy Policy is provided in a layered format so that you can easily click through to the specific areas set out below.

1.	Personal Information That We Collect	1
2.	How We Collect Personal Information	2
3.	How We Use Personal Information	3
4.	When and How We Share Personal Information	4
5.	Your Choices and Access Rights	5
6.	Children	5
7.	Do Not Track	5
8.	Third Party Sites	5
9.	Information Security	5
10.	Retention	5
11.	Updates To This Privacy Policy	5
12.	Contacting Us	6

1. **Personal Information that We Collect.** We may collect, use, store, and, in some cases, share (and may have done so in the preceding 12 months), different kinds of personal information — information identifies you as an individual, and other information we associate with it — including:

- **Identity and Contact Information.** This includes data relating specifically to your identity and contact information, such as your name, social security number, email address, date of birth, mailing address, and telephone number.
- **Financial Information.** This includes information about your transactions with us, such as your participation in our funds, capital account balance, contributions and distributions.

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- **Technical Information.** This includes passively collected technical data, such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Site.
 - **Usage Information.** This includes information about how you use the Site and our services, such as the amount of time you spend reading a particular page.
 - **Communications and Profile Information.** This includes our communications with you, such as if you sign up for our newsletter or other marketing materials. This also includes the data that we receive if and when you create or use a profile on our Site, such as your username and password, transactions made by you, your interests, preferences, feedback, and survey responses.
 - **Applicant Information.** In the case of prospective employees, we may also receive professional or education-related information in connection with your application for employment.

2. How We Collect Personal Information. We use different methods to collect information from and about you, including through:

- **Direct Interactions.** You may give us your Identity, Contact, Profile, and Financial Information by filling in forms or by corresponding with us through the Site, by mail, phone, email, social media, or otherwise. This includes personal information you provide in investor questionnaires or similar forms, and when you use the Google Maps feature on the Site to get directions to our office.
- **Third Parties.** We may receive personal information about you from various third parties, such as Identity and Applicant Information in resumes received from recruiting partners, fit-for-work information received from a physician, background information received from a background check provider, or details obtained from publicly available lists of individuals subject to trade restrictions. We also collect information from business partners and vendors to support our provision of investment services. For example, we may collect information from providers of market surveys and vendors who aggregate publicly available information. The extent to which we may obtain information from such sources is governed by the third-party source.

We may also receive Technical and Usage Information about you from third party analytics and advertising providers such as Google or Facebook, and Identity, Contact, and Applicant Information from social media platforms.

- **Automated Technologies or Interactions.** As you interact with the Site, we may automatically collect Technical and Usage Information about your equipment, browsing actions, and patterns. As described further below, we may use third-party analytics providers and technologies, including cookies and similar technologies, to assist in collecting this information.

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- **Cookies and Similar Technologies.** We collect information about your use of the Site through the use of Internet server logs, cookies and/or tracking pixels. A web server log is a file where website activity is stored. A cookie is a small text file that is placed on your computer when you visit a website, that enables us to: (a) recognize your computer; (b) store your preferences and settings; (c) understand the web pages of the Site you have visited; (d) enhance your user experience by delivering content and advertisements specific to your inferred interests; (e) perform searches and analytics; and (f) assist with security administrative functions. We also may include tracking pixels and web beacons in email messages, newsletters, and other electronic communications to determine whether the message has been opened and for other analytics, personalization, and promotional purpose. You can set your browser to block all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly.
 - **Analytics.** We use Google Analytics to collect and analyze the information discussed above, and to engage in auditing, research, or reporting. The information (including your IP address) collected by various analytics technologies described in the “Cookies and Similar Technologies” section will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Site, including by noting the third-party website from which you arrive, analyzing usage trends, assisting with fraud prevention, and providing certain features to you. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#).

3. How We Use Personal Information. We use personal information as permitted by law and for the following business purposes:

- For the purpose for which you provide the information to us or a vendor;
- To provide features and services available through the Site;
- To provide and improve our investment services, including evaluating potential investments and managing existing investments;
- To respond to your requests or to send you other communications;
- To conduct surveys and analyze market trends and interests;
- To process and respond to your inquiries or to request your feedback;
- For internal research and reporting;
- To improve the content and features of the Site;

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- For recruiting purposes;
 - To comply with legal or regulatory obligations;
 - To enforce the legal terms that govern your use of the Site; and
 - To administer and troubleshoot the Site.

4. When and How We Share Personal Information. We may share your personal information with the parties set out below, for the purposes set out at Section 3, above.

- **Service Providers.** As reasonably necessary, we may share your personal information with third party service providers, such as professional advisers including lawyers, bankers, accountants, auditors, and insurers; vendors, including third party administrators, information technology services providers, and recruiting; public and government authorities and regulators; and with research agencies to do demographic-type studies on our client base.
- **Prospective Investors.** In connection with fundraising efforts for future funds, we may disclose Identity, Contact and Financial Information about our existing investors to one or more placement agents for use in marketing efforts, including communication with prospective future investors.
- **In Cases of Mergers and Acquisitions.** We may share all your personal information with third parties (and their advisors) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- **Third Parties.** As described above, we may share certain Technical and Usage information with third parties who provide us with advertising and website analytics services.

5. Your Choices and Access Rights.

Unaffiliated Third Party Marketing. Investors may direct us not to make certain third party disclosures by returning the opt-out notice provided to investors.

Opting Out of RiverVest Newsletter. You can ask us to stop sending your our newsletter or other marketing messages at any time by following the unsubscribe link in any such message sent to you. If you opt out, you will still receive communications that are required as a result of your ongoing relationship with us or your transactions, and you may also receive important communications about us or the Site.

California Privacy Rights. California residents have certain rights under the California Consumer Privacy Act and other state laws.

- **Access Your Personal Information.** You may request the following information from us: (1) the categories of personal information we have collected about you; (2) the categories of sources from which the personal information was collected; (3) the

business or commercial purpose for collecting or selling (if applicable) your personal information; (4) the categories of third parties with whom we shared personal information; and (5) the specific pieces of personal information we have collected about you.

- **Delete Your Personal Information.** You may request that we delete your personal information. Note that deletion requests are subject to certain limitations, for example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, where information is required to be collected, used or shared under certain federal laws applicable to financial services institutions, if you are an investor, and to process transactions and facilitate customer requests.
- **Do Not Sell.** In the past 12 months, RiverVest has not sold personal information, as those terms are defined in in the California Consumer Privacy Act.
- **Exercising Your Rights.** To exercise your access or deletion rights, please contact us by email at info@rivervest.com, or by telephone at 314-726-6700. Note that we will not discriminate against you in service or price for exercising these rights.
- **Authorized Agent.** You may designate an authorized agent to submit a request on your behalf. We will require written proof of your agent’s permission to act on your behalf, and will verify your identity directly.

6. **Children.** This Site is intended for use by persons who are residents of the United States and who are 16 years of age or over. We do not knowingly collect Personal Information on the Site from children under age 16, and if we become aware that we have collected such Information without valid parental consent, we will take reasonable steps to delete it as soon as practicable.
7. **Do Not Track.** We do not monitor or follow “Do Not Track” signals because there is no standard interpretation or practice for such signals. Therefore, we handle all user information consistent with this Privacy Policy.
8. **Third Party Sites.** The Site may link to other websites, online services, or social media platforms, and such links are provided for your convenience only. If you decide to access any of the third party websites linked from our Site, you do so subject to the terms and conditions of use and privacy policies of those sites, services or platforms.
9. **Information Security.** We have put in place reasonable security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed.
10. **Retention.** We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted for legal, auditing, or compliance purposes.
11. **Updates To This Privacy Policy.** We may periodically update this Privacy Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on our Site. To the extent permitted by law, your use of this Site following these changes means that you accept the revised Privacy Policy.

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- 12. Contacting Us.** If you have any questions about this Privacy Policy or our data practices, please contact us by email at info@rivervest.com or by telephone 314-726-6700. Note that email communications are not always secure, so please do not include account information or other sensitive information in any email to us.