

Privacy

This privacy policy explains our online and offline information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can opt-out of a use or correct or change such information.

Scope

This privacy policy applies to Personal Information that is Processed by Luminate in the course of our business, including but not limited to Luminate websites ("Site"), mobile applications, forums, and blogs (together with any and all future online and offline offerings operated by or on behalf of Luminate, the "Services"). All individuals whose responsibilities include the processing of Personal Information on behalf of Luminate are expected to protect that data by adherence to this privacy policy. This privacy policy is intended to meet requirements globally, including those in North America, Europe, APAC, and other jurisdictions.

Transparency – types of personal information and how we use it

The types of Personal Information we may collect (directly from you or from Third Party sources) and our privacy practices depend on the nature of the relationship you have with Luminate and the requirements of applicable law. Some of the ways that Luminate may collect Personal Information include:

- You may provide Personal Information directly to Luminate through interacting with our Services, participating in surveys, attending events, and requesting Services or information.
- As you navigate the Services, certain passive information may also be collected about your visit, including through cookies and similar technologies as described below.
- We endeavour to collect only that information which is relevant for the purposes of processing. Below are the ways we collect Personal Information and how we use it.

Types of personal information we collect

Luminate collects Personal Information regarding its current, prospective, and former investees, grantees, contractors, and employees, as well as visitors, guests, subscribers, and recipients of Luminate communications (collectively "Individuals").

When you use the Services or engage in certain activities, such as submitting information regarding a potential grant, investment, or contract, responding to surveys, requesting Services or information, or contacting us directly, we may ask you to provide some or all of the following types of information:

- **Interactions with us.**
We may collect Personal Information from you such as email address, phone number, or mailing address when you choose to engage with our Services, request information about our Services, register for Luminate's newsletter that we may offer from time to time, request to receive technical support, or otherwise interact or communicate with us.
- **Surveys.**
From time to time, we may contact you to participate in online surveys. If you decide to participate, you may be asked to provide certain information which may include Personal Information. All information collected from your participation in our surveys is provided by you voluntarily. We may use such information to improve our products, Sites and/or Services and in any manner consistent with the policies provided herein.

- **Posting on the site.**
Luminate may offer publicly accessible pages, blogs, private messages, or community forums. You should be aware that, when you disclose information about yourself in or on Luminate's pages, blogs, private messages, and community forums, the Site will collect the information you provide in such submissions, including any Personal Information. If you choose to submit content to any public area of the Site, such content will be considered "public" and will not be subject to the privacy protections set forth herein.
- **Automatic data collection.**
We may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, mobile carrier, mobile advertising identifiers, MAC address, IMEI, Advertiser ID, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, Internet service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences.
- **Information submitted via services.**
You agree that Luminate is free to use the content of any communications submitted by you via the Services, including any ideas, inventions, concepts, techniques, or know-how disclosed therein, for any purpose including developing and/or marketing Services. Luminate will not release your name or otherwise publicize the fact that you submitted materials or other information to us unless: (a) you grant us permission to do so; (b) we first send notice to you that the materials or other information you submit to a particular part of a Service will be published or otherwise used with your name on it; or (c) we are required to do so by law.
- **Information from other sources.**
We may receive information about you from other sources, including through Third Party services and organizations to supplement information provided by you. For example, if you access our Services through a Third Party application, such as an AppStore or Social Networking Sites ("SNS"), we may collect information about you from that Third Party application that you have made public via your privacy settings. Information we collect through App Stores or SNS accounts may include your name, your SNS user identification number, your SNS user name, location, sex, birth date, email, profile picture, and your contacts on the SNS. This supplemental information allows us to verify information that you have provided to Luminate and to enhance our ability to provide you with information about our business, products, and Services.

How Luminate uses your information

We acquire, hold, use, and Process Personal Information about Individuals for a variety of business purposes, including:

- **To provide services or information requested.**
about you to fulfill requests for Services or information, including information about potential or future Services, including to:
 - generally manage Individual information and Accounts;
 - respond to questions, comments, and other requests;

- provide access to certain areas, functionalities, and features of Luminate’s Services;
 - contact you to answer requests for technical support; and allow you to register for events.
- **Administrative purposes.**
Luminate may use Personal Information about you for its administrative purposes, including to:
 - measure interest in Luminate’s Services; Develop new Services;
 - ensure internal quality control;
 - verify Individual identity;
 - communicate about activities on Luminate’s Services and systems, and, in Luminate’s discretion, changes to any Luminate policy;
 - send email to the email address you provide to us for informational and operational purposes, such as customer service or system maintenance;
 - process applications and transactions;
 - prevent potentially prohibited or illegal activities; and Enforce our Terms.
 - **Marketing Luminate services.**
Luminate may use Personal Information to provide you with materials about opportunities, and Services that may be of interest, including new content or Services. Luminate may provide you with these materials by phone, postal mail, facsimile, or email, as permitted by applicable law. Such uses include:
 - to tailor content and offerings;
 - to notify you about offerings, services, and events that may be of interest to you, including those of our business partners or affiliates;
 - to provide Services to you;
 - for other purposes disclosed at the time that Individuals provide Personal Information; and
 - otherwise with your consent.

You may contact us at any time to opt-out of the use of your Personal Information for marketing purposes, as further described below.

- **Research and development.**
Luminate may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing Services or develop new Services. From time to time, Luminate may perform research (online and offline) via surveys. We may engage Third Party service providers to conduct such surveys on our behalf. All survey responses are voluntary, and the information collected will be used for research and reporting purposes to help us better serve Individuals by learning more about their needs and the quality of the services we provide. The survey responses may be utilized to determine the effectiveness of our Services, various types of communications, and/or promotional activities. If an Individual participates in a survey, the information given will be used along with that of other study participants. We may share anonymous Individual and aggregate data for research and analysis purposes.
- **Services via mobile devices.**
From time to time, Luminate may provide Services that are specifically designed to be compatible and used on mobile devices. Luminate will collect certain information that your mobile device sends when you use such Services, like a device identifier, user settings, location information, mobile carrier, and the operating system of your device. Mobile versions of Luminate’s Services may require that users log in with an Account. In such cases, information about use of mobile versions of the Services may be associated with Accounts. In addition, Luminate may enable Individuals to download an application, widget, or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit Personal Information to Luminate to enable Individuals to access accounts and to enable Luminate to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. Luminate may use personal or non-identifiable information transmitted to Luminate to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this privacy policy or in other notices Luminate provides.
- **Anonymous and aggregated information use.**
Luminate may use Personal Information and other information about you to create anonymised and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Luminate’s Services, or other analyses we create. Anonymised and aggregated information is used for a variety of functions, including the measurement of visitors’ interest in and use of various portions or features of the Services. Anonymised or aggregated information is not Personal Information, and Luminate may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Luminate and with Third Parties for our or their purposes in an anonymised or aggregated form that is designed to prevent anyone from identifying you.
- **Sharing content with friends or colleagues.**
Luminate’s Services may offer various tools and functionalities. For example, Luminate may allow you to provide information about your friends through our referral services, such as “Tell a Friend.” Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Email addresses that you may provide for a friend or colleague will be used to send your friend or colleague the content or link you request, but will not be collected or otherwise used by Luminate or any other Third Parties for any other purpose.
- **Other uses.**
Luminate may use Personal Information for which we have a legitimate interest, such as evaluating a potential grant, investment, or contract, individual or market research, anti-fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

Cookies, pixel tags/web beacons, analytics information and internet-based advertising

We, as well as Third Parties that provide content or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a “device”) that allow us to record certain pieces of information whenever you visit or interact with our sites, services, applications, messaging, and tools, and to recognize you across devices.

- **Cookies**
Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the site may not work properly.
- **Pixel tags/Web beacons**
A pixel tag (also known as a web beacon) is a piece of code embedded on the site that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.
- **Social media widgets.**
Our website includes social media features such as the Facebook “Like” button and LinkedIn (that might include widgets such as the share this button or other interactive mini-programs). These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a Third Party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.
- **Analytics**
We may also use Google Analytics and Google Analytics demographics and interest reporting to collect information regarding visitor behavior and visitor demographics on some of our Services, and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit <https://google.com/policies/privacy/partners/>. You can opt out of Google’s collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Our uses of such technologies fall into the following general categories:

- **Operationally necessary**
We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of functions such as saved search or similar functions;
- **Performance related**
We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our

analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools;

- **Functionality related**
We may use cookies, web beacons, or other similar technologies that allow us to offer enhanced functionality when accessing or using our sites, services, applications, or tools. This may include keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;
- **Delivery related**
We may use first-party or Third Party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on Third Party sites.

If you would like to opt-out of the Technologies we employ on our sites, services, applications, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits. See also the section on “Do Not Track” below.

Third Party websites, social media platforms, and software development kits

The site may contain links to other websites and other websites may reference or link to our site or other Services. These other domains and websites are not controlled by us, and Luminate does not endorse or make any representations about Third-Party websites or social media platforms. We encourage our users to read the privacy policies of each and every website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Luminate’s Services may include publicly accessible blogs, community forums, or private messaging features. The site and our other Services may also contain links and interactive features with various social media platforms (e.g., widgets). If you already use these platforms, their cookies may be set on your device when using our site or other Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by third parties for any number of purposes.

Human resources data

Luminate collects Personal Information from current, prospective, and former employees, their contact points in case of a medical emergency, their dependents and/or family members that are covered by any Luminate health/medical plan, and beneficiaries under any insurance policy, retirement plan, or other similar plan or policy (“human resources data”). The human resources data we collect may include title, name, address, phone number, email address, date of birth, passport number, driver’s license number, social security number or other government-issued identification number, financial

information related to credit checks, bank details for payroll, information that may be recorded on a CV or application form, language abilities, contact information of third parties in case of an emergency, or related to a health/medical plan, insurance policy, retirement plan, or other similar plan or policy. We may also collect sensitive human resources data such as details of health and disability, including mental health, medical leave, and maternity leave; information about national origin or immigration status; and optional demographic information such as race, which helps us achieve our diversity goals.

We acquire, hold, use and process human resources data for a variety of business purposes including:

- workflow management, including assigning, managing and administering projects;
- human Resources administration and communication;
- payroll and the provision of benefits.

Onward transfer

Information we share

We may share your information as described in this privacy policy (e.g., with our Third Party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.

- **We use vendors and service providers**
We may share any information we receive with vendors and service providers. The types of service providers (processors) to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of employment and related services; (iii) provision of information and services you have requested; (iii) our legitimate business purposes; (iv) customer service activities; and (v) in connection with the provision of the Site. Luminate has executed appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.
- **Business partners**
Luminate may share Personal Information with our business partners, and affiliates for our and our affiliates' internal business purposes or to provide you with a service that you have requested. Luminate may also provide Personal Information to business partners with whom we may jointly offer services, or whose products or services we believe maybe of interest to you. In such cases, our business partner's name will appear, along with Luminate. Luminate requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which Luminate provided it to them.
- **Displaying to other users**
The content you post to the Site may be displayed on the Site. Other users of the Site may be able to see some information about you, such as your name if you submit a review. We are not responsible for privacy practices of the other users who will view and use the posted information.

- **Disclosures to protect us or others (e.g. as required by law and similar disclosures)**
We may access, preserve, and disclose your Personal Information and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours, ours' or others' rights, property, or safety; (iv) to enforce Luminate policies or contracts; (v) to collect amounts owed to Luminate; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.
- **Merger, sale, or other asset transfers**
If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be transferred as part of such a transaction as permitted by law and/or contract. In such event, Luminate will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the privacy policy in effect at the time such Personal Information was collected.

Data transfers

All Personal Information collected via or by Luminate may be stored anywhere in the world, including but not limited to, the United States, the European Union, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to Luminate, you consent to the storage of your Personal Information in these locations.

Opt-out (Right to restrict processing) *

All Personal Information collected via or by Luminate may be stored anywhere in the world, including but not limited to, the United States, the European Union, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to Luminate, you consent to the storage of your Personal Information in these locations.

General

You have the right to opt out of certain uses and disclosures of your Personal Information. Where you have consented to Luminate's processing of your Personal Information or Sensitive Personal Information, you may withdraw that consent at any time and opt-out to further processing by contacting privacy@luminategroup.com. Even if you opt-out, we may still collect and use non-Personal Information regarding your activities on our sites and/or information from the advertisements on Third Party websites for non-interest based advertising purposes, such as to determine the effectiveness of the advertisements.

Email and telephone communications

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt-out of receiving future emails, or contact privacy@luminategroup.com. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding your relationship with us. We may also send you certain non-promotional communications regarding Luminate and our Services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this privacy policy).

We, directly or through our Services, maintain "do-not-mail" lists as mandated by law. We process requests to be placed on do-not-mail and do-not-contact lists within 60 days after receipt, or such shorter time as may be required by law.

Mobile devices

Luminate may occasionally send you push notifications through our mobile applications with notices that may be of interest to you. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device. Luminate may also collect location-based information if you use our mobile applications. You may opt-out of this collection by changing the settings on your mobile device.

Rights of access, rectification, erasure and restriction

You may inquire as to whether Luminate is processing Personal Information about you, request access to Personal Information, and ask that we correct, restrict, or delete your Personal Information. Where otherwise permitted by applicable law, you may download and submit this Request Form, send an e-mail to privacy@luminategroup.com or use any of the methods set out in this privacy policy to request access to, receive (port), seek rectification, or request restriction or erasure of Personal Information held about you by Luminate. Please include your full name, email address, and a detailed description of your data request. Such requests will be processed in line with local laws.

Although Luminate makes good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which Luminate is unable to provide access, including but not limited to: where the information is protected by legal privilege or is within the scope of an expected, imminent, or current legal matter; would compromise others' privacy or other legitimate rights; where the burden or expense of providing access would be disproportionate to the risks to the Individual's privacy in the case in question; or where it is commercially proprietary. If Luminate determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Luminate will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

Data retention

Luminate retains the Personal Information we receive as described in this privacy policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defences, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

Security of your information

We take steps to ensure that your information is treated securely and in accordance with this privacy policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Site or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the site or the reason for which you submitted Personal Information. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Site or sending an e-mail to you. You may have a legal right to receive this notice in writing.

International users

By using the Site, Luminate will transfer data to the United States and other international locations. By choosing to visit the Site, utilise the Services or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this privacy policy will be governed by the laws of the state of California, United States, and the adjudication of any disputes arising in connection with Luminate or the site will be in accordance with the Terms.

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United States and other international locations and to processing of your data globally. By providing your Personal Information, you consent to any transfer and processing in accordance with this policy.

Redress/compliance and accountability

If you have any questions about our privacy practices or this privacy policy, please contact Luminate by email at privacy@luminategroup.com. We will address your concerns and attempt to resolve any privacy issues in a timely manner.