

Last Updated: Thu, September 20th at 3:02pm

Privacy Policy

Scope of this Privacy Policy

Venture360 LLC respects your privacy and is committed to protecting it. This privacy policy applies to liquifi.com and any sub-url ('Liquifi Platform') owned and operated by Venture360 LLC. This Privacy Policy describes Venture360's policies and procedures on the collection, use and disclosure of your personal data when you use the Liquifi Platform. It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal data. We will not use or share your confidential information with anyone except as described in this Privacy Policy. This Privacy Policy does not apply to information we collect from other sources. Information which you do not designate as confidential may be publicly available and disclosed. Capitalized terms that are not defined in this Privacy Policy have the meaning given them in Liquifi's Terms of Service.

The Liquifi Platform

The Liquifi Platform offers a set of tools for investors and for entrepreneurs on which they may do many things, including exchange information. Venture360 also allows access to the Liquifi Platform to Organizations for use by their members.

EU – U.S. Privacy Shield

Venture360 participates in and has certified its compliance with the EU – U.S. Privacy Shield Framework. Venture360 is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List. www.privacyshield.gov/list

Venture360 is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Venture360 complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Venture360 is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Venture360 may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at feedback-form.truste.com/watchdog/request.

In compliance with the Privacy Shield Principles, Venture360 commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or

complaints regarding our Privacy Shield policy should contact our U.S.-based third party dispute resolution provider (free of charge) at feedback-form.truste.com/watchdog/request

Venture360 has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for more information or to file a complaint. The services of EU DPAs are provided at no cost to you.

Under certain conditions, more fully described on the Privacy Shield website www.privacyshield.gov/article?id=How-to-Submit-a-Complaint, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

This Privacy Policy applies only to your relationship with Venture360. It does not apply to the interactions that you have with any other individual, entity, investor or other group through the Liquifi Platform. For example, the administrator of an Organization has the ability to disclose or share with other members of the Organization any information that you submit to the Liquifi Platform. **Venture360 has no control over this disclosure or sharing, and is not responsible for it.** The protection of your personal data when you interact with an Organization through the Liquifi Platform is governed solely by any agreements that you may enter into with the Organization and is beyond the scope of this Privacy Policy.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you use the Liquifi Platform, and our practices for collecting, using, maintaining, protecting and disclosing that information.

This Privacy Policy applies to information we collect:

- On the Liquifi Platform;
- In e-mail, text and other electronic messages between you and Venture360, on the Liquifi Platform or otherwise; and
- When you interact with our links and applications on third-party websites and services if they include a link to this Privacy Policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Venture360 or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Liquifi Platform.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use the Liquifi Platform. By accessing or using the Liquifi Platform, you agree to this Privacy Policy.

What is "personal data"?

"Personal data" is any data that (1) is recorded in any form, (2) is about or pertains to a specific individual and (3) can be linked to that individual. For example, and without limitation, your first and last names, address, email address, social security number, tax ID, telephone number, and other contact information, and the deals in which you have participated are "personal data."

What kind of personal data is collected?

We collect personal data at different stages of your use of the Liquifi Platform.

When you visit liquifi.com - If you visit liquifi.com or use an interface which interacts with liquifi.co, whether or not you sign-in as a registered user, we collect your IP address, the location of your Internet Service Provider, the type and version of Internet browser that you are using, and the website from which you came. We also collect information regarding your site usage, such as the time spent on a page and the number of pages you viewed.

When you set up an account - When you set up your account, you will be required to provide certain personal data including your name and email address. You may also be invited to provide optional personal data, such as biography, photograph, postal address, social security or Tax ID, or phone number. If you choose to do so, our use of your personal data shall be governed by this Privacy Policy.

When you interact with the Liquifi Platform - We also collect personal data that you provide when you interact with the Liquifi Platform such as, for example, by sending a message or uploading documents, or when exchanging correspondence with us such as through support emails.

When you use your account - We collect information that you provide or create when you use your account:

- **If you are classified as an Investor, you may record in your profile within your Organization's information about yourself, such as your contact information, picture, biography, experience, or other groups to which you belong. While the Organization's name will be name public, no investor information will be publicly disclosed.**
- **If you are an entrepreneur, and you represent a company that is seeking investors, you may record information about yourself, your company, and your company's management team. You may also include a video recording or picture. All information you put onto the Liquifi Platform is confidential unless you decide to share any of it.**

If you provide any information about or personal data of a third party (such as a person's name or photograph), you are representing to Venture360 that you have all necessary authority and/or have obtained all necessary consents from such individual to enable Venture360 to collect, use and disclose his or her personal data as set forth in this Privacy Policy. If we receive a written complaint or direction from the person, we will take down his or her information and notify you that we have done so.

How is personal data collected?

We collect personal data directly from you when you provide it through your use of the Liquifi Platform, such as in emails or when you fill out forms that are displayed on the Liquifi Platform.

We also use cookies that are sent to your computer, or action tags that are placed on the Liquifi Platform. For additional explanation on cookies and action tags, see Cookies and Action Tags.

For what purpose will my personal data be used?

Venture360 uses your personal data to maintain your account and to provide you with the group and investment management and other services offered on the Liquifi Platform. We also use your personal data to respond to requests that you make of us, and to contact you and to provide you with information that we believe may be of interest to you.

Can third parties see my personal data?

- **If you are an investor - The Liquifi Platform allows the Organization Administrator of an Organization the ability to set certain settings in the profile of the members of the Organization. Thus, for each Organization, the Administrator decides which information is available for access or review by entrepreneurs and/or other Organizations, and which information is not to be disclosed, or is disclosed to selected entrepreneurs and/or other Organizations, according to the policies of the Organization. Please note that (1) the default settings that are set by an Organization Administrator may change from time to time; (2) each Organization may opt for different default settings. While the Liquifi Platform includes initial defaults, Venture360 has no control over the choice of a setting or the change in a default setting by an Organization's Administrator.**
- **If you are an entrepreneur - If you are an entrepreneur and you have posted or uploaded information about you and/or your team, this information is disclosed to the Organizations to whom you have chosen to disclose the information.**

With whom may Venture360 share personal data?

Under certain business or legal conditions, Venture360 may have to disclose your personal data to others as follows:

- **Within the Venture360 Family - Venture360 may now or in the future have a parent, subsidiary or related company or companies within the Venture360 family of companies. Venture360 has the right to share all personal data with all such affiliated companies.**
- **Service Providers - Venture360 may engage other companies and individuals to perform necessary business functions on behalf of Venture360 (e.g. customer service or email provider). If it is necessary to perform these functions, these companies or individuals may have access to personal data of our users. These service providers have agreed not to use the personal data for any other purpose other than providing the required services.**
- **Legally Required Disclosure - Under certain circumstances, disclosure of your personal data may be required by law. Venture360 may disclose your personal data (1) if, in its own best judgment, it is required by law to do so in order to comply with**

a facially valid judicial or governmental subpoena, warrant, bankruptcy proceedings, or other order, or (2) to a government institution that has asserted its lawful authority to obtain the information, or (3) when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud.

- **Change of Ownership - If ownership of Venture360 changes as a result of a merger, acquisition, or transfer to another company, your personal data may be transferred to the successor entity. If such transfer takes place, you will be notified of any material changes to the Privacy Policy and provided with the ability to opt-out of the transfer of your personal data to the successor entity.**

Sharing with Third Parties

"Third Parties" are companies unaffiliated with the Liquifi Platform. We do not share your personal information with Third Parties.

Can I access or change my personal data?

Upon request Venture360 will provide you with information about whether we hold any of your personal information. If your personal data changes, you may correct, update, or amend by making the change on our member information page or by emailing our Customer Support at support@venture360.co or by contacting us by postal mail at the contact information listed below. If you wish to delete/remove/deactivate your profile or remove your testimonial from our site please email us at support@venture360.co. We will respond to your request to access within 30 days.

Data Retention

We will retain your information for as long as your account is active to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

For auditing and security purposes, Venture360 keeps a log of all users' activities, which is retained in its archives as necessary for Venture360 to fulfill its obligations. Users may have access to the personal data that pertain to them. However, because the administrative and technical burden associated with the retrieval of these archived data is substantial, Venture360 charges a fee for this effort in a manner that is consistent with its actual cost. In addition, each user's right of access may be limited to the extent that providing access might infringe on a third party's privacy rights. Requests for access to this archived information are handled on a case-by-case basis, after Venture360 has verified the identity of the requestor. Inquiries should be made as provided in the section.

Can I have my personal data deleted?

You can delete any personal data that is recorded in the profile that you create for yourself as an investor or for your company, or as an entrepreneur.

Social Media Widgets

Our Web site includes Social Media Features, such as the Facebook and Twitter button. 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. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

Single Sign-On

Venture360 does not utilize single sign-on from third party websites. However, using Venture360's API, clients may implement a single sign-on solution from Venture360 to site not controlled by Venture360. In such a situation, Venture360 only passes the user's name, email address and user role after successfully logging into Liquifi's portal.

Testimonials

We may display video- or text-based testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at support@venture360.co

Invite Members

If you choose to invite a user to our platform, we will ask you for a name and email address. We will automatically send your invite a one-time email inviting him or her to visit the site. Venture360 stores this information for the sole purpose of sending this one-time email and tracking the success of invites claimed. Your invitee may contact us at support@venture360.co to request that we remove this information from our database.

What is Aggregated Data, and how is it used?

Data aggregation is a process in which information is gathered and expressed in a summary form for purposes such as statistical analysis, in order to obtain information about a particular group based on specific variables. Data used for aggregation purposes are collected in a form that removes all identifiers, and may be combined with other data for which all identifiers have also been removed. Venture360 uses aggregated data to generate accurate metrics about the early stage private equity industry

Aggregated data are packaged and licensed to third parties such as governments, economic development agencies and financial institutions. Examples of aggregated data may include:

- **Data about the early equity space, such as number of deals in a month-to-month or quarter-to-quarter basis at various generic stages of the funding process (e.g. new deals, in-progress deals, inactive deals, and invested deals).**
- **Data about industries and geographies related to companies seeking investors and those successfully obtaining investments.**

What is Website Data, and how is it used?

Website data is aggregated data about the overall traffic to, and usage of the Liquifi Platform. Examples include the number of visitors to the liquifi.com website and the number of registered users of the Liquifi Platform. Venture360 may extract and use website data for internal purposes, in order to analyze the performance of the Liquifi Platform and applications. For example, we

may use these data for traffic analysis and business decision making, in order to determine how we can improve our site or its functionalities.

The statistics generated in this manner contain no personal data and cannot be used to gather any information about individual visitors to the site.

Cookies and other Tracking Technologies

We and our partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole.

Cookies

Venture360 uses 'cookies.' A cookie is a small amount of data sent to a user's web browser from a web server, which is then stored on the user's hard drive. Cookies are used to make site navigation easier, and can help recognize a returning visitor. Venture360's cookies do not generate any personal data, do not read personal data from your computer, and are not tied to any personal data. Most browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies, or to prompt you before accepting cookies from the sites that you visit. If you decide not to accept our cookies, some or all features of the site may not be available because navigation on the site is facilitated by cookies. You can delete cookies from your computer at any time. You can learn more about cookies by visiting: allaboutcookies.org or networkadvertising.org.

Action Tags

Venture360 uses action tags. An action tag is a small piece of code that is placed on a webpage or in an email in order to track the pages viewed or the messages opened, the date and time when someone visited our website, the website from which the visitor came, the type of browser used, and the domain name and address of the user's Internet Service Provider. Action tags allow us to better understand how users and visitors use our site or browse through our pages, so that we can improve access to and navigation through the site, add or modify pages, according to our user's patterns. Action tags cannot be removed or deleted by our users, because they are part of the programming of a webpage.

Log Files

Log file information is automatically reported by your browser each time you access a web page. When you use the Liquifi Platform, our servers automatically record certain information that your web browser sends out whenever you visit any website. These server logs may include information such as your web request, IP address, browser type, referring/exit pages, operating system, date/time stamp, the files viewed on our site (e.g., HTML pages, graphics, etc.) and URLs, number of clicks, domain names, landing pages, pages viewed, and other similar information.

Web Beacons

When you use the Liquifi Platform, we may employ web beacons, which are used to track the online usage patterns of Users anonymously. No personal data from your account is collected

using these beacons. In addition, we may also use web beacons in HTML-based emails sent to Users to track which emails are opened by recipients.

The use of cookies or similar technologies by our partners is not covered by our privacy policy. We do not have access or control over these cookies or similar technologies.

Behavioral Targeting

We partner with a third party to either display advertising on our website or to manage our advertising on other sites. Our third party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click [here](#) (or if located in the European Union click [here](#)). Please note you will continue to receive generic ads.

Do Not Track Signals

Venture360 does not track or use Do Not Track signals.

What security measures are in place to protect my personal data?

Venture360 uses physical, technical, and administrative procedures in order to safeguard and protect personal data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. However, while we do our best to implement reasonable security measures, we do not guarantee that our safeguards will always work.

Venture360 uses industry-standard technological means to protect your personal data while in transit through the Internet. We use encryption and a comprehensive authentication protocol to provide reasonable security. However, please remember that no security system on the Internet is perfect. If you have any questions about security on our Web site, you can contact us at support@venture360.co.

What about Uploaded Documents?

Documents that are uploaded to the Liquifi Platform for sharing are stored at a third party data-storage service. All uploads and downloads are transmitted through the web between users and the data storage service using the same encryption techniques as those that are used with personal data. However, uploaded documents are neither stored redundantly, nor backed up. Therefore, we recommend that Venture360 users keep back-up copies of their documents if they upload them to the liquifi.com website.

When will Venture360 contact me?

Venture360 will communicate with you in response to your requests for service or customer support. We will contact you by phone or by email, according to your preference.

Venture360 will send you service-related emails if it becomes necessary to do so. Venture360 may send you an email in order to notify you of updates to our Privacy Policy, Terms of Service, or other agreement that you have with Venture360. Venture360 may also send you an email in order to notify you of new products, or services or features. If you no longer wish to receive these emails, you may opt out of them by clicking on the unsubscribe button. For system generated emails (in response to you or other Liquifi users actions) the majority of them are

configurable under settings. If you do not want to receive any emails from Venture360, you can opt out by deactivating your account by contacting support@venture360.co

Links to other websites

Venture360 may provide links to other websites. We are not responsible for the privacy practices or content of these sites. In order to safeguard your privacy, please review the privacy policies of any sites that you may visit before providing any personal data to these third party sites.

Limitation of Liability

Venture360 exercises reasonable efforts to safeguard the security and confidentiality of your personal data; however, transmissions protected by industry standard technology and administered by humans cannot be guaranteed to be secure. Venture360 will not be liable for unauthorized disclosure of personal data that occurs through no fault of Venture360 including, but not limited to, errors in transmission, access to your account by anyone using your user ID and password, your failure to comply with your security obligations, and the unauthorized acts of Venture360's employees.

Choice

If at any time Venture360 wishes to disclose, or use your personal data in a way, or for a purpose other than as described in this Privacy Policy, Venture360 will give you the opportunity to choose (opt out) whether your personal data (1) may be disclosed to a third party and (2) may be used for a purpose other than the purposes that are set forth in this Privacy Policy. If you do not want us to share your personal data with these members, contact us at support@venture360.co.

California Privacy Rights

California Civil Code Section - 1798.83 permits users of the Liquifi Platform that are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please send an e-mail to support@venture360.co or write us at: Venture360 1828 Walnut Kansas City Missouri 64108.

Changes to the Privacy Policy

From time to time, Venture360 may update this Privacy Policy in order to reflect changes in its practices. Whenever such changes are made, Venture360 will post an updated Privacy Policy on its website and may email registered users. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

All changes will apply to the personal data that are already collected, and to personal data that are collected after the effective date of the revised Privacy Policy, and will become effective when posted.

You will have the right to terminate your account at any time.

Contacting Venture360

Venture360 LLC owns and operates the liquifi.com web site and the Liquifi Platform. Our mailing address is 1828 Walnut Kansas City Missouri 64108.

If you have any questions about this Privacy Policy, or believe that its terms have not been complied with, please email Venture360 at: support@venture360.co