

Privacy Statement.

How HealthRise Capital handles personal data.

In accordance with the EU General Data Protection Regulation (GDPR).

DOCUMENT

Privacy Statement

ISSUER

HealthRise Capital Management B.V.

BINDING LANGUAGE

Dutch (this is a courtesy translation)

GOVERNING LAW

Dutch law

SUPERVISOR

Dutch Data Protection Authority

INTRODUCTION

How we handle your data.

HealthRise Capital Management B.V. (“HealthRise Capital”) is committed to handling personal data with care. This Privacy Statement explains which personal data we process via healthrisecapital.com (the “Website”) and in our subsequent correspondence, on what legal grounds we do so, how long we retain such data, and which rights you have.

This Privacy Statement has been prepared in accordance with the EU General Data Protection Regulation (the “GDPR”). It forms an integral part of the legal framework governing the use of the Website, alongside the Terms of Use, the Disclaimer and the Cookie Statement.

This Privacy Statement has been originally drafted in Dutch. This English text is a courtesy translation. In the event of any discrepancy between the Dutch and the English version, the Dutch version prevails.

1. Data controller

The data controller for the processing activities described in this Privacy Statement is:

HealthRise Capital Management B.V.

Emmalaan 7, 1075 AT Amsterdam, the Netherlands

Dutch Trade Register no. 42040050

E-mail: hello@healthrisecapital.com

HealthRise Capital has not appointed a data protection officer; the nature and scale of our processing activities do not require one under article 37 GDPR. Privacy questions, requests and complaints may be sent to the e-mail address above.

2. Personal data we process

We process the following categories of personal data.

- 2.1 Contact and submission data.** When you contact us through the contact form on the Website (which we operate through Typeform) we process the data you provide: name, e-mail address, telephone number, company name and the contents of your message. If you upload a pitch deck or other document, we also process the contents of that document, including any personal data of yours or of third parties contained therein.
- 2.2 Correspondence data.** If we engage with you following your initial contact, we process the data you share in further correspondence, together with the related metadata (dates, times, e-mail addresses).
- 2.3 Relationship data.** We maintain a record of our interactions with founders, advisers and other parties in our customer relationship management system (also operated through Typeform). This typically includes the data referred to in clauses 2.1 and 2.2 and our internal notes relating to those interactions.
- 2.4 Technical data.** When you visit the Website, our hosting and security providers automatically process limited technical data, including your IP address, browser type, operating system and the pages you visit. Such data is used for security, error detection and Website performance.

3. Purposes and legal grounds

We process your personal data only for the purposes set out below, on the legal ground from article 6 GDPR mentioned in each case.

- 3.1 Reviewing your message or pitch.** We use your data to read, evaluate and — where we consider it appropriate — respond to your message. Legal ground: legitimate interest (article 6(1)(f) GDPR), namely our interest in being able to evaluate proposals and correspondence effectively.
- 3.2 Preparing a possible engagement.** If your message leads to further discussions, we use your data to conduct those discussions and to record any resulting arrangements. Legal ground: performance of pre-contractual measures at your request (article 6(1)(b) GDPR).
- 3.3 Relationship management.** We use your data within our customer relationship management system to keep an accurate record of our interactions and to manage our ongoing relationships. Legal ground: legitimate interest (article 6(1)(f) GDPR).
- 3.4 Security and proper functioning of the Website.** Technical data is processed to prevent abuse, resolve incidents and improve the operation of the Website. Legal ground: legitimate interest (article 6(1)(f) GDPR).
- 3.5 Compliance with legal obligations.** Where we are required by law to retain or disclose data, we do so. Legal ground: legal obligation (article 6(1)(c) GDPR).

4. Retention periods

We retain personal data only for as long as is necessary for the purposes for which we process it. The following retention periods apply.

- 4.1 Pitches and messages without follow-up — 24 months.** If your message or pitch does not lead to a follow-up, we retain the related data for a maximum of 24 months from the date of last contact, after which we delete it, unless a statutory retention obligation requires a longer period.
- 4.2 Ongoing or completed engagements.** If your message leads to an engagement or agreement, we retain the related data for the duration of that relationship and thereafter for the statutory retention periods applicable to the data concerned (in principle, seven years for accounting records).
- 4.3 General correspondence and relationship records.** Other correspondence and relationship records held in our customer relationship management system are retained for no longer than 24 months from the date of last contact, save where the law requires otherwise.
- 4.4 Technical data.** Technical data and log files are retained by our hosting and security providers for a limited period determined by those providers, of no more than twelve months.

5. Recipients of your personal data

HealthRise Capital shares your personal data only with the categories of recipients set out below. We do not sell personal data and do not use it for third-party marketing.

- 5.1 Webflow, Inc. (United States) — hosting platform.** The Website is hosted by Webflow. In that capacity, Webflow may process technical data and any data submitted through the Website on behalf of HealthRise Capital. A data processing agreement applies.
- 5.2 Cloudflare, Inc. (United States) — content delivery and security.** Cloudflare provides content delivery and security services for the Website. In that capacity, Cloudflare may process technical data, including IP addresses and connection metadata, on behalf of HealthRise Capital. A data processing agreement applies.
- 5.3 Typeform S.L. (Spain) — contact form and CRM.** Our contact form and our customer relationship management system are operated through Typeform. In that capacity, Typeform may process contact form data, correspondence data and relationship data on behalf of HealthRise Capital. A data processing agreement applies.
- 5.4 Google Ireland Limited and Google LLC — e-mail environment.** Our e-mail correspondence runs through Google Workspace (Gmail). In that capacity, Google may process the contents of e-mails and attachments on behalf of HealthRise Capital. A data processing agreement applies.
- 5.5 Advisers and service providers.** We may share personal data with external advisers (including accountants, lawyers and notaries) to the extent necessary for the purposes for which the data was collected or for compliance with legal obligations.
- 5.6 Competent authorities.** Where required by law, we disclose personal data to supervisory, law enforcement or tax authorities.

6. Transfers outside the European Economic Area

- 6.1** Through our use of Webflow, Cloudflare and Google Workspace, personal data may be transferred to, or be accessible from, the United States. Typeform is established in the European Union and processes data primarily within the European Economic Area.
- 6.2** For transfers to the United States we rely on the EU-US Data Privacy Framework (Adequacy Decision of the European Commission of 10 July 2023), to the extent the relevant US entity is certified under that framework. Where that framework does not or no longer applies, we rely on the Standard Contractual Clauses adopted by the European Commission.

7. Security

HealthRise Capital takes appropriate technical and organisational measures to protect personal data against loss, unauthorised access, alteration or destruction. Such measures include encrypted connections (HTTPS), two-factor authentication on accounts with access to personal data, and access restrictions based on need-to-know. We review our measures periodically and adjust them where necessary.

8. Your rights

Under the GDPR you have the following rights in relation to your personal data.

- 8.1 **Right of access.** You may request information about the personal data we process about you.
- 8.2 **Right to rectification.** You may request the correction of inaccurate or incomplete data.
- 8.3 **Right to erasure.** You may request the deletion of your data, subject to any statutory retention obligations applicable to us.
- 8.4 **Right to restriction and to object.** You may request the restriction of processing or object to processing carried out on the basis of our legitimate interest.
- 8.5 **Right to data portability.** Where the processing is based on consent or on a contract and is carried out by automated means, you may request the transfer of your data in a commonly used format.
- 8.6 **Submitting a request.** You may submit your request to hello@healthrisecapital.com. We respond in principle within four weeks. We may ask you to verify your identity before we process your request.
- 8.7 **Right to lodge a complaint.** You have the right at any time to lodge a complaint with the Dutch Data Protection Authority (autoriteitpersoonsgegevens.nl).

9. Cookies

The Cookie Statement of HealthRise Capital governs the placement and reading of cookies via the Website. The Cookie Statement is available on the Website and forms an integral part of the legal framework.

10. Amendments

HealthRise Capital may amend this Privacy Statement, for instance in response to changes in our processing activities or in applicable law. The applicable version, dated, is published on the Website. We encourage you to consult this Privacy Statement periodically.