

# VMG PARTNERS II, LLC WEBSITE PRIVACY POLICY AND CALIFORNIA CANDIDATE PRIVACY NOTICE AND POLICY

*Last updated: February 28, 2020*

## 1 INTRODUCTION – WEBSITE PRIVACY POLICY

- 1.1 This website privacy policy (the “**Website Privacy Policy**”) describes the types of personal information VMG Partners II, LLC and its affiliates (together, “**VMG Partners**”, “**we**”, “**our**”, “**us**”) receives about you when you visit [www.vmgpartners.com](http://www.vmgpartners.com) (the “**Website**”) or collects about you in other contexts to assist us in supporting our portfolio companies and general ecosystem networking. It describes what we do with your personal information, how we protect it, and how you can contact us if you have a question or concern about the personal information we hold about you. Your use of this Website is also subject to the Terms of Use available on the Website.
- 1.2 If you are an investor or potential investor in a VMG Partners fund entity, or affiliated co-investment entity, or a representative thereof (together, “**VMG Investors**”), information we collect about you or the privacy policy that governs the information we collect about you is separate from this Website Privacy Policy and is available by contacting us via the methods described in Section 1.3 (the “**Investor Privacy Notice**”). This includes your access to a dedicated [investor portal](#), linked to/from the Website (the “**Investor Portal**”), where we will collect your email address to provide you with login credentials and to allow you to access the Investor Portal.
- 1.3 VMG Partners may be contacted at the below for all questions relating to this Website Privacy Policy:

E-mail: [compliance@vmgpartners.com](mailto:compliance@vmgpartners.com)

Phone: 833-742-0960 (toll free)

Address: 39 Mesa Street, Suite 310, San Francisco, CA 94129

## 2. PERSONAL INFORMATION WE RECEIVE WHEN YOU VISIT THE WEBSITE AND HOW WE USE IT

- 2.1 When you visit the Website, you may provide us with certain information about yourself and we will receive other information regarding your use of the Website. We collect, and have collected over the last twelve (12) months, the following personal information about visitors to the Website:
  - (a) Information you may choose to submit to VMG Partners using any means of contact listed on the Website, including the “Contact Us” form and your name, email address and message submitted using such form. In such instances, we will use such information to maintain our business records, manage our relationship with you, communicate with you, and comply with Law (defined below); and
  - (b) Information you submit when you make requests pursuant to Section 6, will be used for the purposes of responding to those requests or as otherwise permitted by law.

## 3. PERSONAL INFORMATION WE RECEIVE IN OTHER CONTEXTS AND HOW WE USE IT

- 3.1 When you interact with us outside the context of the Website, including in person, over email and telephone, we may receive certain information about you. We collect, and have collected over the last twelve (12) months, the following information: your name, telephone number,

email address and employment information. In such instances, we will use such information to support our portfolio companies, including in relation to their recruitment management.

#### **4. WITH WHOM DO WE SHARE PERSONAL INFORMATION COLLECTED ABOUT YOU**

4.1 We share, and have shared over the last 12 months, personal information collected about you with selected third parties. The categories of recipients include the following (which may be updated from time to time):

- (a) All recipients to whom we may be required to disclose such personal information when required by a valid subpoena or court order, or as otherwise required by applicable law, regulation, legal or judicial process or audit, decision of a court or arbitral tribunal, decision of a governmental authority with relevant powers, or by the rules of applicable stock exchange or recognized market place, or requested or required by a regulator, bank examiner or self-regulatory organization or pursuant to mandatory ethics rules (together, “**Law**”);
- (b) Web hosting service providers, including WP Engine;
- (c) Email and other IT service providers, including Global Relay and Microsoft 365;
- (d) Investor Portal service providers, including Alta Return;
- (e) Providers of professional advisory services, including consultants, legal advisors and accountants and other third party service providers; and
- (f) Our portfolio companies (in relation to information collected about you in the context described in section 3.1)

4.2 We do not, and will not, sell personal information collected about you.

#### **5. HOW WE PROTECT PERSONAL INFORMATION COLLECTED ABOUT YOU**

5.1 While we maintain certain policies to protect personal information that we may collect, no method of transmission over the Internet is completely secure. Therefore, while we strive to protect personal information that we collect, we cannot guarantee absolute security and confidentiality.

#### **6. COOKIES**

6.1 Like many websites, the Website uses “cookies” to collect information about how the Website is used. A cookie is a small data text file which a website stores on your computer’s hard drive, if permitted by your web browser.

6.2 We use cookies to identify you as a unique user when visiting the Website, to enable us to track usage so that we can improve the Website, for IT system security purposes and to help us in the ongoing maintenance of the Website.

6.3 This technology does not provide us with any information about your name, address phone number or email address, or any other personally identifiable information. We do, however, log visitor IP addresses.

6.4 Most browsers are initially set up to accept cookies. You can reset your browser to notify you when you have received a cookie, or alternatively, to refuse to accept cookies. However, you may not be able to use certain features on the Website if you choose not to accept cookies. You

can find more information about cookies and how to manage them at <http://www.allaboutcookies.org/>.

- 6.5 “Do not track” signals are preferences that users can set on their web browsers to limit how their activity is tracked across online services. The Website does not respond to “do not track” signals in your web browser.

## **7. CALIFORNIA RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT**

- 7.1 Where applicable, if you are a California resident you may have the following rights under the California Consumer Privacy Act of 2018 (the “CCPA”) in relation to “personal information” we have collected about you as defined in the CCPA; these rights are, to the extent required by the CCPA and subject to verification and any applicable exceptions:

- (a) *Right to Know/Access:* You have the right to request that we disclose certain information to you about our collection and use of certain personal information about you as described below:
- (i) the specific pieces of personal information collected;
  - (ii) the categories of personal information collected;
  - (iii) the categories of sources from whom the personal information is collected;
  - (iv) the purpose for collecting the personal information; and
  - (v) the categories of third parties with whom we have shared the personal information.
- (b) *Right to Delete:* You have the right to request that we delete the personal information.

- 7.2 To request your exercise of the rights described above, please submit a request to us by either:

- (a) Calling us toll-free at 833-742-0960;
- (b) Visiting [www.vmgpartners.com](http://www.vmgpartners.com); or
- (c) Emailing us at [compliance@vmgpartners.com](mailto:compliance@vmgpartners.com).

- 7.3 *Freedom from Discrimination:* You have the right to be free from unlawful discrimination for exercising any of the rights above.

- 7.4 We will need to verify your identity prior to addressing your request.

- 7.5 Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to personal information collected about you. To designate an authorized agent, the authorized agent must provide sufficient information that allows us to reasonably verify that they have been authorized by you to act on their behalf.

## **8. ACCESS BY PERSONS WITH DISABILITIES**

- 8.1 Persons with disabilities who need assistance accessing this Website Privacy Policy may contact us as provided for in Section 1.3, and depending on your individual needs, we will grant reasonable requests to furnish this policy in an alternative format.

**9. CHILDREN**

- 9.1 We do not knowingly collect personal information from children under the age of 13. If you are under 13, please do not give us any personal information. If you have reason to believe that a child under the age of 13 has provided us with their personal information, please contact us as provided for in Section 1.3 and we will seek to delete that information in our possession.

**10. THIRD PARTY WEBSITES**

- 10.1 This Website may from time to time contain links to other external websites. This Privacy Policy does not apply to third-party websites. We do not control and are not responsible for the privacy practices or the content of third-party websites.

**11. UPDATES TO OUR WEBSITE PRIVACY POLICY**

- 11.1 We may update this Website Privacy Policy from time to time and will post any changes when they go into effect.