

# Privacy Policy

This Privacy Policy describes Sophia Innovation Capital LLC. (“Sophincap”, “we,” “us,” or “our”) policies and practices regarding its collection and use of your personal data and sets forth your privacy rights. This Privacy Policy applies both to our online information gathering and dissemination practices in connection with the website [www.sophincap.com](http://www.sophincap.com) and its various pages (the “Site”), and personal information we collect or receive offline, whether directly from you or from other sources.

When you use this website, you consent to the use of your personal data by Sophincap as outlined in this Privacy Policy. This Privacy Policy is subject to change. Use of this website after the policy is updated indicates your consent to any changed terms.

Use of our Site is strictly limited to persons who are of legal age in the jurisdictions in which they reside. You must be at least eighteen (18) years of age to use our Site. If you are not at least 18 years of age, please do not use or provide any information through this Site.

This Privacy Policy does not apply to any website owned and/or operated by or on behalf of any other entity, including our portfolio companies, even if our Site posts a link to those other websites and you click through from our Site. To the extent that you visit and/or disclose information through other sites, you are subject to the privacy policies and practices of those sites.

If you have any questions or concerns regarding our privacy policies, please contact us at [m.rodriquez@vsfo.mx](mailto:m.rodriquez@vsfo.mx)

## I. What Personal Information Do We Collect, From Where, And Why

The following is a description of: (i) the categories of Personal Information we may have collected in the preceding 12 months, whether offline or online; (ii) the sources from which we may have collected it; and (iii) the business purposes for which we may have collected it.

Categories of personal data collected: Sophincap collects the following categories of personal data:

- Identifiers: name, residential or business address, telephone number, nationality, tax identification number or passport number, date of birth, place of birth, photographs, and copies of identification documents.
- Customer records: bank account details, information about assets or net worth, credit history, signature.
- Commercial information: information on investment activities, information when you contact us with inquiries.
- Internet or other electronic network activity: browsing history, search history, and information regarding a consumer’s interaction with our website.
- Unique personal identifier: customer number, cookies, IP address, device identifier.
- Special categories of personal data (Sensitive Personal Data), where relevant: information on criminal convictions.

### A. Information we do NOT knowingly collect.

We do not knowingly solicit, collect, or receive information from or about minors (under the age of eighteen).

## **B. Information that You provide to us directly.**

You may choose to voluntarily submit or otherwise disclose Personal Information to us (e.g., name, email address, address, resumé, phone number, contact type (investor, employment candidate, etc.), and a personalized message about your inquiry, etc.), through the “Contact Us” page on our Site, or through mail, e-mail, telephone, fax or electronically.

If you initiate contact or correspond with us, we may keep a record of your contact information and correspondence, whether oral or written, and we reserve the right to use your contact information, and any other information that you provide to us in your message, to respond thereto or to offer customer service and attempt to resolve your request or inquiry.

If you wish to change or correct any information voluntarily submitted to us, please do so by contacting us in the manner described above.

## **C. Information we receive from Portfolio Companies.**

We receive and maintain Personal Information about consumers contained in the accounts and business records of the portfolio companies in which we invest and to which we provide shared services.

The nature of this information varies widely depending on the nature of the portfolio company’s business and the business purpose for which the records are being shared with us. The information may include name, address, phone number, address, e-mail address, date of birth, social security number, financial or banking information, credit information, account numbers, account balances, payment information, information contained on credit applications, insurance applications or claims, etc.

We may have access to, receive, or use this information for purposes of auditing, risk management, and in connection with the shared services we offer to portfolio companies in which we invest, including accounting, legal, capital markets, data analytics, human resources, information technology and marketing services.

## **D. Information we receive from Third Parties during Due Diligence.**

We may receive Personal Information from third party entities in which we are considering making an investment, as part of due diligence. Any such receipt of information is shared confidentially for the purpose of analyzing a potential investment in a company and is subject to a nondisclosure agreement that prohibits us and our representatives from further disclosing or using the information for any other purpose.

## **E. Information automatically collected by Use of this Site.**

As with most websites, our Site automatically collects certain information during a user’s visit to the Site. The information may include internet protocol (IP) addresses, the location where the device is accessing the internet, browser type, operating system and other information about the usage of the Site, including a history of pages viewed. We use this information to improve the Site’s design,

estimate user volume and usage patterns, speed up searches, and improve the user experience by customizing options and recognizing return users. We may also use this information to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. More specifically:

(i) IP Address

Each time you visit our Site, we may automatically collect your internet protocol (IP) address and the web page from which you came. In order to administer and optimize the Site for you and to diagnose and resolve potential issues with or security threats to our Site or to the company, we may use an IP address to help identify users and to gather broad demographic information about them.

(ii) Cookies

Cookies (browser or flash) are small files that a site or its service provider transfers to your device through your web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. We use cookies to optimize Site functionality and improve a user's experience while navigating through the Site. Most or all browsers permit you to disable or reject cookies. You can do this by adjusting your preferences in the browser. You can also click on the "Privacy and Cookies Policy" banner at the bottom of the Site and adjust Cookie Settings to accept or reject certain cookies used by our Site.

We may aggregate information collected from Site visits by various users to help us improve the Site and the services that we provide through the Site.

## **II. Use of Information**

Upon our collection of your Personal Information, Sophincap may use and disclose such Personal Information internally and to its affiliates and service providers, separately or in combination with pre-existing information, for the following business purposes:

- To provide any requested information or services;
- To troubleshoot problems with the Services;
- To customize your experience on the Services;
- To analyze how you and others use the Services;
- To enforce any agreements, or compliance with this Privacy Policy;
- To contact you with more information about Sophincap;
- To comply with law, court order or other legal process; or
- To protect the rights, property, or safety of Sophincap and its affiliates, our employees, our users, or others.
- To research on usage patterns, product development, online site customization, targeted marketing, customer satisfaction surveys, customer habits, or other analyses.
- To recruit, evaluate, hire and promote personnel.

We do not sell, trade, rent or otherwise disclose your information to third parties for monetary or other valuable consideration. Please note that while we endeavor to protect the privacy of your Personal Information we collect, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. We may disclose Personal Information that we collect about you to the following categories of third parties:

- **Business affiliates:** We may provide personal data within our company and across offices for the legal and legitimate purposes described above. The categories of personal data we may disclose to business affiliates may include identifiers, customer records, and commercial information.
- **Service providers:** We may disclose your personal data to third party service providers and business partners that perform services for us and who are obligated to secure the information, such as information technology service providers, trading platform providers, suppliers, contractors, consultants, and analytics or marketing providers. These companies are bound by contractual obligations to keep personal data confidential and use the data only for the purposes for which it has been disclosed to them. The categories of personal data we may disclose to service providers may include identifiers, customer records, commercial information, and geolocation.
- **Government and law enforcement:** We may disclose any and all categories of personal data as required by a court order or any other legal or regulatory requirement, including in response to requests from public and government authorities, or to protect our rights, privacy, safety, or property.

### **III. How we protect your personal data**

We take reasonable security, technical and administrative measures to protect personal data from misuse, interference, and unauthorized loss, access, modification, or disclosure. We follow industry standard data protection practices to protect the personal data submitted to us, both during transmission and once we receive it. This includes deploying a variety of commercially available software and hardware security tools. We will take such measures with respect to your personal data using security measures that we use for the personal data of others, and we will do so in compliance with all applicable data protection laws and our professional secrecy and ethical obligations.

Unfortunately, no method of transmission over the Internet, or method of electronic storage, is 100% secure. As a result, while we will strive to protect your personal data, we cannot and do not guarantee or warrant the absolute security of any of your personal data. We will not be and are not liable for disclosures of your personal data due to errors in transmission, networks that we do not control, nor unauthorized acts of third parties.

### **IV. Your rights with regard to your personal data**

Subject to local law, including the EU General Data Protection Regulation (“GDPR”), you may have certain rights regarding personal data we have collected about you. Such rights might include the right to (a) know what personal data we have collected about you, (b) know what personal data about you was disclosed to third parties, (c) update or correct such data if you believe there is an inaccuracy, or is not complete, (d) restrict the processing of your personal data, (e) request deletion of your personal data, (f) object to our use of your personal data, (g) request transmission of your personal data to another data controller, (h) confirm the existence of the processing of your personal data, (i) revoke your consent, (j) request information about the personal data we have shared, (k) receive

information about the possibility of denying consent and the consequences of said denial, (l) oppose to the processing of your personal data when is noncompliant with the GDPR, or (m) request review by a natural person, of decisions taken solely based on automated processing of personal data that affects your interests. We will not discriminate against you for exercising any of these privacy rights, except that the deletion of your personal data may prevent us from providing you content or other benefits that depend on the processing of your personal data.

If you would like to exercise any of these rights provided under local law, you may contact us by email at [m.rodriguez@vsfo.mx](mailto:m.rodriguez@vsfo.mx)

If you would like to make a complaint about how we handled your personal data, or make a complaint about a breach of data protection laws, please contact us using the information provided below in Section V. Complaints will be investigated and the outcome of the investigation will be communicated to you after the complaint is made in accordance with applicable law. You may have a right in some locations to file a complaint with your local data protection authority.

## **V. Questions or complaints about the Privacy Policy**

Your privacy and security is important to us. We continually monitor customer feedback and seek to improve our services to meet your needs. If you have any questions, comments, or complaints about our Privacy Policy, the information practices of this website, or your interaction with Sophincap's website you can send us an email at: [m.rodriguez@vsfo.mx](mailto:m.rodriguez@vsfo.mx)

## **VI. Additional Information in Relation to Data Processing Under the CCPA**

The below additional information applies only to Data Subjects who are residents of the state California in the United States where we process Personal Data under the California Consumer Privacy Act ("CCPA"). In accordance with the CCPA you may have the right to:

- Access/port Personal Data about you consistent with legal requirements. In addition, you may have the right in some cases to receive or have your electronic Personal Data transferred to another party.
- Request correction of your Personal Data where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your Personal Data or we may refer you to the controller of your Personal Data who is able to make the correction.
- Request deletion of your Personal Data, subject to certain exceptions prescribed by law.
- Request restriction of or object to processing of your Personal Data, including the right to opt in or opt out of the sale of your Personal Data to third parties, if applicable, where such requests are permitted by law.

If you would like to exercise any of these rights, please contact us via email at: [m.rodriguez@vsfo.mx](mailto:m.rodriguez@vsfo.mx).

We will process such requests in accordance with Data Protection Laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.