

# Privacy Policy / Política de Privacidad

Effective [July 15-2020]

## WE CARE ABOUT YOUR PRIVACY

Acumen LatAm Impact Ventures LLC (“ALIVE,” “we,” “our,” “us”), is an investment management firm focused on impact investment funds aimed at supporting early growth stage companies across Latin America. We understand that privacy is important, and we are strongly committed to protecting the privacy of visitors to our Website.

The following notice is designed to help you better understand the information we gather from those who visit [https://alive-ventures.com/] (the “Website”). It also describes how we handle the information once we gather it, whether we disclose it to anyone, and the choices you have regarding our use of the information. This Privacy Statement, together with the Terms of Use and Conditions, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. By sharing information with ALIVE or by visiting this Website, you are accepting the practices described in this Privacy Statement.

We have structured our Website so that you can visit it without identifying yourself or revealing any Personal Data. If you choose to provide us with information by which you can be identified, you can be assured that it will only be used in accordance with this Privacy Statement.

## WEBSITE PRIVACY STATEMENT

Please read this Privacy Statement carefully to fully understand how we collect, share, and protect information about you. This Privacy Statement is incorporated into and is part of the Terms of Use and Conditions of this Website. To access the Terms of Use and Conditions, [click here](#).

By accessing and using the Website, you agree that you have read and understand this Privacy Statement and that you accept and consent to the privacy practices and uses or disclosures of information about you that are described herein.

## I. INFORMATION WE COLLECT

Our primary goals in collecting Personal Data are to share information about our work, to invite you to events designed to update you on ALIVE’s activities, and to allow you to request information. However, in order to deliver personalized and relevant information to you through our Website, we collect certain information from users. Please do not provide any sensitive information or health information. If you should do so inadvertently, we will use and disclose that information in the same manner as any other information you provide to us as more fully described below.

In operating our website, we may collect and process the following data or information about you:

## A. Information You Provide

- If you use the Contact Us form available on the Website, ALIVE will collect your name, organization, email address, and any other personal information you share in your message. None of this information will be published.
- If you sign up for our newsletter, we will collect your email address. We also collect, via our third party email platform, the following information:
  - Open rates
  - Click rates
  - Bounced emails
  - Unsubscribe rates
  - IP Address
  - Data and time of opens/clicks

Please see the Privacy Policy of the third party platform linked in Annex A of our Terms of Use and Conditions for more information.

- If you post a comment on ALIVE's Website, ALIVE will collect your name, email address, and your Website (if you choose to share your Website). ALIVE may publicly display your name and Website with your comment, but your email address will not be published.

## B. Information Collected Automatically

We may collect information used primarily to provide an enhanced online experience, including, but not limited to, traffic data, location data, weblogs, and other communication data, including your IP address, the date and time you accessed or left the Website and which pages you viewed, the type of operating system in use (e.g. Macintosh, Windows), the domain name, and the type of browser being used (e.g. Firefox, Chrome, Internet Explorer, etc.)

## C. Use of Cookies, Aggregate Data Collected Online

Cookies are text files created by websites that transfer information to your computer. Cookies allow websites to remember information about a user, such as a user's preferences when visiting the Website. As with most websites, ALIVE, by itself and through third-party services such as Google Analytics, uses cookies to evaluate use of the Website and improve services. You can generally opt to disable cookies in your browser. However, if you disable cookies, you may not be able to access certain parts of the Website, or certain aspects of the Website may not work correctly.

We do not track or collect personally identifiable information about our Website users unless you choose to subscribe for ALIVE updates via e-mail through our Website. Our Website does not have the ability to respond to a 'do not track' signal on a user's browser.

## II. USE OF YOUR INFORMATION

ALIVE will not sell your Personal Data to third parties. However, ALIVE will use the information we collect for the following purposes:

- To share or disclose information with your consent.
- To comply with applicable law, regulation, or governmental request; to protect the safety of ALIVE, Website users, or others; to protect the rights or property of ALIVE; to comply with contractual obligations of ALIVE; and other instances when ALIVE is legally required to disclose your information.
- To share information that is public or does not include Personal Data, such as aggregated data or a publicly posted comment.
- To provide you with information relating to our services.
- To provide third parties with statistical information about the users of our website.
- To third parties if you use certain third party features to share information about user activity through our Website. For example, the “Share” button on blog posts allows users to share posts on social networks. If you use these features, ALIVE will share this information with the third-party website or service, along with additional information you provide to use the feature (e.g., a Twitter username). By accessing these third-party websites, you are consenting to the terms and privacy policies of those websites. You should read those third-party website privacy policies and terms of use. We do not accept any responsibility or liability for their policies whatsoever, as we have no control over them.
- To any affiliated business entities or third parties necessary to provide services to you, including, but not limited to, our subsidiaries, our holding company and its other subsidiaries (if any), as well as third parties involved in the administration and operation of our services.
- To a third party if we sell any or all of our business and/or assets to them.

### III. SECURITY AND RETENTION OF PERSONAL DATA

We maintain a risk-based approach to physical, administrative, and technical security measures to protect the confidentiality, availability, and integrity of your Personal Data. You should be aware, however, that no transmission of data over the Internet is 100% secure, and that unauthorized third parties may unlawfully intercept or access private data. You provide us with this information at your own risk.

We retain your Personal Data:

- For as long as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.
- For as long as necessary for the purpose for which we collect it.

### IV. THIRD-PARTY WEBSITE INTERACTION

By accessing other third-party websites through our Website, you are consenting to the terms and privacy policies of those third-party websites. We do not accept any responsibility or liability for their policies whatsoever, as we have no control over them. We do not have control over whether third parties track a user’s online activities over time and across different websites. We do not have the ability to respond to ‘do not track’ signals in this regard.

## V. CHILDREN

This Website is only intended for use by those who have reached age 13 and older. By using our Website, you are affirming that you are at least 13 years old. ALIVE does not knowingly collect Personal Data from children under 13. As noted in ALIVE's Terms of Use, by signing up for a user account or by using the Website, users certify that they are 13 years of age or older. If you believe that a child under the age of 13 has provided information to the Website, please notify ALIVE at [Iroland@acumen.org](mailto:Iroland@acumen.org). We are not liable for any damages that may result from the user's misrepresentation of age.

## VI. YOUR RIGHTS REGARDING PERSONAL DATA

Those who visit our Website, including you, may have a variety of legal rights regarding the processing of Personal Data. These rights vary depending on applicable law, but may include, by way of example:

- the right to know what Personal Data we maintain about you;
- the right to know with whom we have shared your Personal Data;
- the right to receive a copy of your Personal Data; and
- the right to access, correct, or delete your Personal Data.

You may exercise any rights you have under your applicable law with respect to Personal Data by contacting us as described below. We may request additional information from you to authenticate any such requests.

If you receive promotional messages from us, you may unsubscribe at any time by following the opt-out instructions contained within the message. Even after you opt out of receiving promotional messages from us, you may continue to receive administrative messages from us.

## VII. PRIVACY STATEMENT CHANGES

We may, from time to time, make changes to this Privacy Statement based on your comments and our needs. The most current version of this Privacy Statement will always be available at <https://alive-ventures.com/es/terms-of-use/>. Any modifications will become effective immediately upon posting. By continuing to use the Website, you accept such modifications.

If we make any substantial changes in the way we use your Personal Data, may notify you by email if you have shared your email with us, or we will notify you by posting a prominent announcement on our Website.

## VIII. GOVERNING LAW

You agree that your use of this Website, this Privacy Statement, and any disputes relating thereto shall be governed in all respects by the laws of the State of New York.

## IX. HOW TO CONTACT US

Your privacy is important to ALIVE. If you have any questions or concerns regarding ALIVE's Privacy Statement, please direct them to:

Acumen LatAm Impact Ventures LLC

c/o Lynn Roland, General Counsel

Acumen Fund, Inc.  
40 Worth Street, Suite 303  
New York, NY 10013

You may also send an email to [lroland@acumen.org](mailto:lroland@acumen.org)

#### X. PRIVACY STATEMENT FOR DATA SUBJECTS WHOSE PERSONAL DATA MAY BE COLLECTED IN THE EUROPEAN UNION

EU GENERAL DATA PROTECTION REGULATION ("GDPR"). ALIVE is a global brand, and thus our investors and website visitors may be from the European Economic Area ("EEA"). In order to serve our website visitors, we may transfer Personal Data from individuals located within the EEA ("Data Subjects"). Personal Data that may be collected by us from a Data Subject in the EEA may include:

- Name
- Email Address
- Organization
- Website
- If you subscribe to our newsletter:
  - Open rates
  - Click rates
  - Bounced emails
  - Unsubscribe rates
  - IP Address
  - Data and time of open/clicks

We may potentially deal with local supervisory authorities in all EU states where we have an existing relationship with a Data Subject. Additionally, information that we collect may be transferred outside of the EEA, including to countries, such as the United States, which have not been deemed as having "adequate" security measures by the European Commission.

#### LAWFUL GROUNDS TO PROCESS AND OBTAIN CONSENT

We process Personal Information of Data Subjects who are located in the EEA for one or more of several lawful purposes, including when you consent to providing us information; to comply with our own legal obligations; and for our legitimate business purposes.

Data Subjects whose Personal Data is collected in the EEA may withdraw consent at any time, where consent is the lawful basis for processing his/her information. Should a Data Subject withdraw consent for processing or otherwise object to processing that impedes ALIVE's ability to comply with applicable regulations, a Data Subject may be unable to avail himself/herself of the services that ALIVE provides.

## DATA SUBJECTS' RIGHTS

All individuals whose Personal Data is held by ALIVE have the right to:

- ask what information ALIVE holds about them and why;
- ask for a copy of such information or access to such information;
- be informed how to correct or keep that information up to date; and
- be informed on how ALIVE is meeting its data protection obligations.

Furthermore, for data collected in the EEA, Data Subjects have the right to:

- ask for a copy of such information to be sent to a third party;
- ask for data to be erased if possible and required under the GDPR;
- ask for processing of Personal Data to be restricted if possible and required under GDPR;
- object to processing of Personal Data if possible and required under GDPR;
- object to automated decision-making where applicable; and
- contact a supervisory authority in the EEA to lodge a complaint regarding ALIVE's processing of your Personal Data.

## AUTOMATED DECISION-MAKING

ALIVE will not engage in automated decision-making activities.

## NON-DISCLOSURE OF INFORMATION

ALIVE does not share any Personal Data with any nonaffiliated third parties, except as detailed in this Privacy Statement:

CONTACT INFORMATION FOR PERSONS LOCATED WITHIN THE EEA. If you are located in the EEA or Switzerland and have questions or concerns regarding the processing of your Personal Data, you may contact our EU Representative at [lroland@acumen.org](mailto:lroland@acumen.org) or write to us at:

Acumen LatAm Impact Ventures LLC

c/o Lynn Roland, General Counsel

Acumen Fund, Inc.

40 Worth Street, Suite 303

New York, NY 10013

If, as an EEA Citizen, you believe that ALIVE has not adequately resolved any such issues, you have the right contact the EU supervisory authority.

Thank you for taking the time to understand more about ALIVE by browsing our Website.