

*Last Updated: September 9, 2020*

In order to ensure transparency and give you more control over your personal information, this privacy policy ("**Privacy Policy**") governs how we, **Pitango International MC 2019 Ltd.** and other entities of the Pitango's group (together, "**Pitango**" "**we**", "**our**" or "**us**") use, collect and store personal data that we collect or receive from or about people who view our website or make contact with us through our website, investors and prospective investors in our various funds, actual and prospective portfolio companies, and all other persons with whom we interact in the course of our business ("**you**") such as in the following use cases:

- (i) When you browse or visit our website, <https://www.pitango.com/> ("**Website**")
- (ii) When you make use of, or interact with, our Website
  - a. When you log in to our investor portal
  - b. When you subscribe to our newsletters
  - c. When you contact us (e.g. need help, submit a request)
- (iii) When you register to and/or attend a marketing event and provide us with your personal data for marketing purposes
- (iv) When we use the personal data of existing or potential portfolio companies and/or existing or potential investors in the ordinary course of our business
- (v) When we use the personal data of our service providers and/or consultants (e.g. contact details)
- (vi) When you apply at Pitango or at a portfolio company and we process your job application

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. "**Personal data**" or "**personal information**" means any information that can be used, alone or together with other data, to uniquely identify any living human being.

You are not legally obligated to provide us personal information, and you hereby confirm that providing us personal information is at your own free will, but if you do not provide us with your personal information we will not be able to perform and provide certain services, features, content and functionalities to you as further detailed in this Privacy Policy.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific personal data we collect	Why is the personal data collected and for what purposes?	Third parties with whom we share your personal data	Retention period	Consequences of not providing the personal data
<b>When you browse or visit our Website</b>				
Analytics cookies	<ul style="list-style-type: none"> <li>To better understand our website visitors</li> <li>To improve how we present our content</li> <li>To collect information about the Website</li> <li>To improve the Website by measuring any errors that may occur</li> </ul>	N/A	<ul style="list-style-type: none"> <li>ga (http): 2 years</li> <li>gat (http): 1 day</li> <li>gid (http): 1 day</li> <li>Collect (Pixel): Session</li> </ul>	<p>Cannot better understand our website visitors</p> <p>Cannot improve how we present our content</p> <p>Cannot collect information about the Website</p> <p>Cannot improve the Website by measuring any errors that may occur</p>
<b>When you make use of, or interact with, our Website</b>				
<b>When you log in to the investor portal</b>				
<ul style="list-style-type: none"> <li>Username</li> <li>Password</li> </ul>	<ul style="list-style-type: none"> <li>To log in to the investor portal</li> <li>To access to financial reports</li> <li>To receive information about Pitango's investment activities</li> </ul>	<p>3rd parties such as for the following purposes:</p> <p>eFront Investment Management Platform</p>	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot log in to the investor portal</p> <p>Cannot access to financial reports</p> <p>Cannot receive information about Pitango's investment activities</p>
<b>When you subscribe to our newsletters</b>				
<ul style="list-style-type: none"> <li>Username</li> <li>Password</li> </ul>	<ul style="list-style-type: none"> <li>To receive our newsletters</li> <li>To send marketing communications</li> </ul>	<p>3rd parties such as for the following purposes:</p> <p>MailChimp – Marketing mailing list</p> <p>Hubspot – CRM</p> <p>Microsoft Office 365 – Mailbox</p>	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot receive our newsletters</p> <p>Cannot send marketing communications</p>

<b>When you contact us (e.g. need help, submit a request)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Any other information that you decide to provide us</li> </ul>	<ul style="list-style-type: none"> <li>• To receive and respond your request (e.g., support service for performance evaluations)</li> <li>• To customize your experience</li> <li>• To send marketing communications</li> </ul>	3rd parties such as for the following purposes:  MailChimp -Marketing mailing list  EventBrite – Events organization  Hubspot – CRM  Microsoft Office 365 – Mailbox	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws	Cannot receive and respond your request (e.g., support services for performance evaluations)  Cannot customize your experience  Cannot send marketing communications
<b>When you register to and/or attend a marketing event and provide us with personal data for marketing purposes</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Job title</li> <li>• Email address</li> <li>• Company name</li> <li>• Phone number</li> <li>• Any other information that you decide to provide us</li> </ul>	<ul style="list-style-type: none"> <li>• To contact you in relation with our products/services</li> <li>• To establish a business connection</li> <li>• To send marketing communications</li> </ul>	3rd parties such as for the following purposes:  MailChimp - Marketing mailing list  EventBrite – Events organization  Hubspot – CRM  Microsoft Office 365– Mailbox	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws	Cannot contact you in relation with our products/services Cannot establish a business connection  Cannot send marketing communications
<b>When we use the personal data of our service providers and/or consultants (e.g. contact details)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> </ul>	<ul style="list-style-type: none"> <li>• To receive and respond your request</li> <li>• To enter and/or perform any contractual rights and obligations under any agreement with you or any other transaction that you are doing with us</li> </ul>	3rd parties such as for the following purposes:  Microsoft Office 365 - Mailbox	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws	Cannot receive and respond your request  Cannot enter and/or perform any contractual rights and obligations under any agreement with you or any other transaction that you are doing with us

When we use the personal data of potential or existing portfolio companies and/or existing or potential investors in the ordinary course of our business				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Job title</li> <li>• Assigned ID</li> <li>• Business email</li> <li>• Business phone</li> <li>• Home phone</li> <li>• Mobile phone</li> <li>• Business Fax</li> <li>• Address</li> <li>• Citizenship</li> <li>• Company name</li> <li>• Signature</li> <li>• Nationality</li> <li>• Credit history</li> <li>• Bank account details</li> <li>• Tax information</li> <li>• Information about regulatory status</li> <li>• Source of funds details</li> <li>• Details relating to your investment activity</li> <li>• Information about past experience of investors</li> <li>• Any information that you decide to provide us</li> </ul>	<ul style="list-style-type: none"> <li>• To receive and respond your request</li> <li>• To establish and maintain our communications and business relations with you</li> <li>• To provide our services to you (e.g., drawdown notices, fundraising, etc.)</li> <li>• To ensure compliance with applicable laws and or regulations</li> <li>• To send marketing communications and to conduct business development activities</li> </ul>	<p>3rd parties or categories such as for the following purposes:</p> <p>eFront - Investment Management Platform</p> <p>Microsoft Office 365 - Mailbox</p> <p>Pitango's service providers (banks, brokers, insurers) – General administration of our activities</p> <p>External advisors (e.g., lawyers, insurance consultants, accountants and auditors) – To perform work in behalf of us</p> <p>Tzur – Fund administrator (e.g., in order to proceed to our AMC/KYC checks)</p>	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot receive and respond your request</p> <p>Cannot establish and maintain our communications and business relations with you</p> <p>Cannot provide our services to you (e.g., drawdown notices, fundraising, etc.)</p> <p>Cannot ensure compliance with applicable laws and/or regulations</p> <p>Cannot send marketing communications and/or conduct business development activities</p>
When you apply at Pitango or at a portfolio company and we process your job application				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• CV / cover letter</li> <li>• Any other information that you decide to provide us</li> </ul>	<ul style="list-style-type: none"> <li>• To assess you as a candidate at Pitango and/or at Pitango's portfolio companies</li> <li>• To analyze your application</li> <li>• To forward your application to our portfolio companies</li> </ul>	<p>3rd parties such as for the following purposes:</p> <p>Our portfolio companies – To forward your job application and establish a work connection between you and our portfolio companies</p> <p>Microsoft Office 365 - Mailbox</p>	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws</p>	<p>Cannot assess you as a candidate</p> <p>Cannot analyze your application</p> <p>Cannot forward your application to our portfolio companies</p>

Finally, please note that some of the above mentioned personal data will be used and shared for fraud detection and prevention, anti-money laundering detection and prevention and for security purposes. The abovementioned personal data may also be used and shared to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize your personal data. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND RETAIN YOUR INFORMATION

Security. We have implemented appropriate technical, organizational and security measures designed to protect your personal data. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

Retention of your personal data. In addition to the retention periods mentioned above, in some circumstances we may store your personal data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. We have an internal data retention policy to ensure that we do not retain your personal data perpetually.

## 3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your personal data as follows:

- 3.1. With our business partners with whom we jointly offer products or services. We may also share Personal Data with our affiliated companies
- 3.2. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.3. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events;
- 3.4. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal data in connection with the foregoing events; and/or
- 3.5. Where you have provided your consent to us sharing or transferring your personal data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

## 4. STORAGE AND TRANSFERS OF PERSONAL DATA

- 4.1. Storage: We do store a part of your personal data on our servers located in Israel. However, we do not ourselves host all the personal data – Hosting is also done by third party service providers that we engage. This means that personal data you provide us or that we collect from you is hosted with such third party service providers on servers that they own or control. Regardless of where such third party service providers are located (and some are located in the US), their servers may be located anywhere in the world (including the US). Your data may even be replicated across multiple servers located in multiple countries. So please be aware that you are consenting to your data being transferred to various third party service providers around the world (including the US).
- 4.2. External transfers: Where we transfer your personal data outside of Israel (for example to third parties who provide us with services), we will obtain contractual commitments from them to protect your personal data.

## 5. YOUR PRIVACY RIGHTS

**Rights:** The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals:

- You have the right to be informed and access personal data held about you;
- You have the right to request that we rectify any personal data we hold that is inaccurate or misleading;
- You have the right to stop direct marketing and automated decision making;
- You have the right to request the erasure/deletion of your personal data.
- You have a right to lodge a complaint with the relevant supervisory authority. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us at [privacy@pitango.com](mailto:privacy@pitango.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

## 6. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any personal data to us without involvement of a parent or a guardian. In the event that we become aware that you provide personal data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [privacy@pitango.com](mailto:privacy@pitango.com).

## 7. INTERACTION WITH THIRD PARTY PRODUCTS

We enable you to interact with third party websites, mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

## 8. LOG FILES

We may use log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

## 9. ANALYTIC TOOLS

**Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personal information.

Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>.

You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>. We reserve the right to remove or add new analytic tools.

## 10. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- 10.1. California Privacy Rights: California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@pitango.com](mailto:privacy@pitango.com). Please note that we will respond to one request per customer each year, unless otherwise required by law.
- 10.2. Our California Do Not Track Notice: We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer's online activities over time and across different web sites when a consumer uses the Services.
- 10.3. Deletion of Content from California Residents: If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or personal information you have publicly posted. If you wish to remove such content or personal information and you specify which content or personal information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you may not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.
- 10.4. Your privacy rights: Please see Section 5 above.

## 11. HOW TO CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@pitango.com](mailto:privacy@pitango.com)

Pitango Israel  
11 HaMenofim St. Building B  
Herzliya 4672562  
Israel