

At Yolo Investments, we respect your privacy and are committed to protecting the personal data you provide to us. This Privacy Policy explains how we collect, use, store, and share personal information in compliance with the General Data Protection Regulation (GDPR), the Data Protection (Bailiwick of Guernsey) Law, 2017 and other applicable data protection laws like ePrivacy Directive (ePD). It also outlines your rights concerning your personal data.

Who We Are

Yolo Investments Management Limited, the data controller ("Yolo"), is registered in Guernsey with Company Registration: 70143 and Registered Office: Suite 7, Second Floor, La Plaiderie Chambers, La Plaiderie, St Peter Port, Guernsey, GY1 1WG.

Yolo investments is a venture capital platform, dedicated to supporting innovation and growth in various industries. Our platform connects investors with innovative startups and projects. We are the data controller, meaning we determine the purposes and means of processing personal data. Our Data Protection Officer (DPO) oversees all privacy matters to ensure compliance with GDPR.

Scope of This Privacy Policy

This policy applies to our interactions with:

- Users of our platform (investors and startups)
- Visitors to our websites and online services
- Individuals applying for investment opportunities
- Partners and service providers
- It covers personal data collection via our website, applications, email communications, and other services related to the platform.

Legal Basis for Processing

The primary reason to collect personal data is to allow us to i) conduct business activities such as client due diligence, investor capital transactions and payments, and ii) carry out recruitment processes.

We only collect relevant data, and we hold it on file for as long as required for a legitimate interest following which it will be deleted.

We are entitled to hold and process your personal data on the following **lawful grounds**:

- Consent: Where you have provided clear consent for us to process your personal data for specific purposes.
- Contract: Where processing is necessary for the performance of a contract or to take steps at your request before entering into a contract.

-Legal Obligation: Where processing is necessary to comply with legal obligations, such as anti-money laundering (AML) laws, tax regulations, and other statutory duties.

-Legitimate Interests: Where processing is necessary for our legitimate interests, such as ensuring platform security, business continuity, and safeguarding investments, provided these interests do not override your data protection rights.

Personal Data We Collect

This data is gathered during the course of activities listed in our agreements including client due diligence, as well as recruitment, correspondence, website subscriptions and dealings with other providers and businesses.

We may collect and process the following types of personal data:

-Identity Information: Name, title, date of birth, gender, and identification documents (where necessary).

-Contact Information: Email address, phone number, and physical address.

-Financial Information: Bank account details, transaction history, tax information and information necessary for due diligence and compliance with financial regulations.

-Investment Data: Information related to investment preferences, portfolio, interactions with our platform.

-Technical Data: IP address, browser type, device information, and online activity on our platform.

-Professional Data: Employment history, education, and skills (for startup applicants and business partners).

-Marketing Preferences: Communication preferences and interactions with marketing content.

-We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about criminal convictions and offences.
- Personal information we receive from third-party sources, such as:
 - *entities in which you or someone connected to you has an interest;
 - *your legal and/or financial advisors;
 - *other financial institutions that hold and process your personal information; and
 - *credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements.

How We Collect Personal Data

We collect personal data through:

-Direct Interactions: When you register on our platform, apply for investment, or communicate with us.

-Automated Technologies: Through cookies, server logs, and other technologies on our website and apps.

-Third Parties: From partners, service providers, or publicly available sources (e.g., professional networks, regulatory bodies).

How We Use Personal Data

We process personal data for the following purposes:

- Platform Services: To manage your account, facilitate investments, and provide platform functionalities.
- Compliance: To meet legal obligations, including due diligence, fraud prevention, and AML requirements.
- Marketing: To send updates, newsletters, and promotional content if you have opted in.
- Business Analytics: To analyze user behavior, improve our services, and enhance platform security.
- Customer Support: To respond to inquiries, resolve complaints, and provide technical assistance.

Data Retention

We retain personal data for as long as necessary to fulfill the purposes outlined in this Privacy Policy, and in accordance with legal obligations (e.g., tax, accounting, and regulatory requirements).

The retention period is determined by:

- Compliance with data protection and applicable laws;
- Defending legal rights and obligations; and
- The length of the relationship (for as long as required in light of the purpose for which it was received).

Data Security

We employ robust security measures to safeguard your personal data, including:

- Encryption: Data is encrypted in transit and at rest where applicable.
- Access Controls: Restricted access to personal data based on need-to-know principles.
- Data Minimization: We collect only the data necessary for the specified purpose.
- In case we engage third-party processors (e.g., cloud storage providers), we ensure they meet our security standards and comply with GDPR through Data Processing Agreements (DPAs) or Standard Contractual Clauses (SCCs).
- Our secure data centre protects against the risk of theft, floods, fire, power cuts, etc. No data is stored on portable/remote devices.
- All access to our system is controlled through user login IDs, that include a two-factor authentication process.

Sharing Personal Data

We only disclose data where necessary. We currently share data with our database administrator, website host, Worldcheck Refinitiv for screening purposes, IT support and outsourced Compliance support, all of which have appropriate data protection language included in their contracts.

We also share data with regulators, banks, and third-party providers as necessary to fulfil our contractual and legal obligations.

Where we share your information with a third party, we require the recipients of that personal information to put in place adequate measures to protect it.

Where we transfer your personal information outside the European Economic Area, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:

- the country to which we send the personal information may be approved by the European Commission as providing adequate protection for personal data;
- by utilizing a contract based on “model contractual clauses” approved by the European Commission.

In other circumstances, the law may permit us to otherwise transfer your personal information outside the EEA.

If you would like further information about the safeguards we have in place to protect your personal information, please get in touch with us.

Your Rights

As a data subject under GDPR, you have the following rights regarding your personal data:

-Access: Request access to the personal data we hold about you.

-Rectification: Request corrections to inaccurate or incomplete data.

-Erasure: Request deletion of your personal data when it is no longer necessary for the purposes for which it was collected.

-Restriction: Request limitation on the processing of your personal data.

-Data Portability: Request transfer of your data to another service provider in a structured, machine-readable format.

-Objection: Object to processing based on legitimate interests, or withdraw consent where processing is based on consent.

-To exercise any of these rights, please contact us at dpo@yolo.io .

Cookies and Tracking Technologies

We use cookies and similar technologies to enhance user experience, analyze traffic, and personalize content. You can manage your cookie preferences via your browser settings or opt out where required.

Changes to the Privacy Policy

We may update this Privacy Policy from time to time. Any updates will be posted on our website, and significant changes will be communicated via email or platform notifications.

Contact Us

If you have any questions or concerns about this Privacy Policy or wish to exercise your rights, please contact our Data Protection Officer at:

Email: dpo@yolo.io

Effective Date: 20th of September 2024