

Privacy Policy for Vicinity

Last update: July 8, 2024

1. Introduction

We care deeply about protecting your data privacy and have created this privacy policy to inform you about how we process and use the personal data of individuals (“you, your”) who visit our website, register to the platform and utilise its services.

Vicinity, a platform owned and operated by Lab08 Ltd. ("Lab08," "we," "us," or "our"). Its primary purpose is to connect investors and startup founders by analysing data that they have provided in the platform or we have legally obtained via public registries or other platforms to which we have been granted access to. This Privacy Policy describes how we collect, use, and share personal data when you use our platform and services. By using Vicinity, you agree to this Privacy Policy. If you do not agree with this policy, please do not register on the Vicinity platform.

2. Data Controller

Lab08 Ltd.

Address: Sofia 1000, 14 Todor Aleksandrov Blvd., fl. 2, office 4

Email: privacy@myvicinity.ai

3. Data subjects and information we collect

3.1 Data Subjects

We collect data about individual visitors to our website, individuals who voluntarily register on the Vicinity platform and the current and past business entities they have affiliation with.

3.2 Personal Data of Website visitors

- **Contact information:** We may collect personal data such as name, email address and other personal and business information that you may provide on registration forms on the website with the purpose to gain access to data or communication materials.
- **Log Data:** Information automatically collected when you access our platform, including your IP address, browser type, operating system, referral URLs, and pages viewed.
- **Cookies and Similar Technologies:** We use cookies to enhance your experience, gather general visitor information, and track visits to our website. You can control the use of cookies at the individual browser level.

3.3 Personal Data Provided by Registered Users

- **Registration Data:** When you register on our platform, we collect personal data including your name, email address, company name, job title, and other contact details.

- **Profile Information:** We may collect additional information such as your professional background, investment preferences, startup details, financial information, and any other information you voluntarily shared on the platform.
- **Service Use:** We log usage data when you visit or otherwise use our platform
- **Communication Data:** Information contained in your communications with us, including chatbot interactions, emails, messages sent through our platform, and feedback.

3.4 Data from Event Partnerships

To enhance our visibility and product awareness, we may enter into partnerships with event organisers, where we communicated explicitly that partnership. We may provide special levels of access to event participants that register to the Vicinity platform within the context of the event. We treat the personal data provided by registered users from events in the same way as if they registered directly to the platform.

3.5 Data from Public Registries

To enhance our analysis and the data profiles of our users, we may collect information from publicly accessible sources such as:

- **Company Registries:** Information about businesses, their executives, products, financial performance.
- **Professional Networks:** Data from platforms like LinkedIn, AngelList, or other professional networks.
- **Other Public Databases:** Financial reports, market data, and other relevant public records.

4. Purpose of Data Processing

We process your personal data for the following purposes:

- **Account Management:** To create and manage your account on Vicinity, authenticate your identity, and provide you with customer support.
- **Service Delivery:** To facilitate the interaction between registered users on the platform based on directly provided by users and otherwise collected data.
- **Communication:** To send you updates, respond to inquiries, provide customer support, and inform you about changes to our services.
- **Analysis and Improvement:** To analyse the use of our platform, understand user behaviour, improve our services, and develop new features.
- **Marketing:** To send you promotional materials and newsletters, if you have opted in to receive them.
- **Compliance and Legal Obligations:** To comply with legal obligations, enforce our terms and conditions, and protect our legal rights.

5. Legal Basis for Processing

We process your personal data based on the following legal grounds:

- **Performance of a Contract:** To provide the services you have requested and fulfil our contractual obligations.
- **Legitimate Interests:** For our legitimate interests in managing, operating, and improving our services, and protecting the security of our platform.
- **Consent:** Where you have provided your consent for specific purposes, such as receiving marketing communications.
- **Legal Obligations:** To comply with legal requirements and regulatory obligations.

6. Data Sharing and Disclosure

We may share your personal data with:

- **Service Providers:** Third-party vendors who assist us in operating our platform, such as IT service providers, payment processors, and marketing agencies. These entities process your data based on agreements with us and in accordance with our instructions.
- **Legal and Regulatory Authorities:** Where required by law, or necessary to protect our rights, we may disclose your personal data to law enforcement, regulatory agencies, or other legal bodies.
- **Potential Buyers:** In the event of a merger, acquisition, or sale of all or a portion of our assets, your personal data may be transferred to the acquiring entity.

7. Data Retention

We retain your personal data for as long as necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. Specific retention periods include:

- **Account Information:** Retained for as long as your account is active and for a period of time thereafter as per legal requirements.
- **Communications Data:** Retained for as long as necessary to respond to inquiries and for record-keeping purposes.
- **Usage Data:** Retained with the purpose to analyse and improve our services.

8. Your Rights

You have the following rights concerning your personal data:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you or for the purposes for which it was collected).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.

- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Access to Data:** You can request access to your personal data and obtain a copy in machine readable form.
- **Withdraw Consent:** You can withdraw your consent at any time where we process your data based on consent.

9. Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or misuse. These measures include encryption, access controls, and regular security assessments.

10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new policy on our platform and updating the effective date. Your continued use of the platform after the changes become effective constitutes your acceptance of the new Privacy Policy.

11. Contact Us

If you have any questions or concerns about this Privacy Policy or our data processing practices, please contact us at: privacy@myvicinity.ai
Address: Sofia 1000, 14 Todor Aleksandrov Blvd., fl. 2, office 4