



PRIVACY POLICY

of Paua Ventures Verwaltungs GmbH for applications

We are pleased that you would like to apply to us. In the following, we explain how we process your personal information during an application procedure and provide other relevant information in this context.

1. Who is responsible for the processing of your personal data?

Paua Ventures Verwaltungs GmbH, Dircksenstrasse 47, 10178 Berlin, Germany (hereafter referred to as "**we**"), is responsible within the meaning of the EU General Data Protection Regulation ("**GDPR**").

2. Contact person

All questions related to the processing of your personal data and the exercise of your rights under GDPR can be obtained from Anna Fishman via anna@pauaventures.com.

3. What is personal data?

Personal data is any information relating to an identified or identifiable natural person (the "**data subject**"). This includes, for example, your name, date of birth, contact details and CV.

4. Which categories of personal data do we process?

We process data related to your application. This may include general personal information (such as name, address and contact details), details of your professional qualifications and education, or professional development or other information that you provide to us in connection with your application. Apart from this, we can process your publicly available job-related information, such as a profile on a professional social media network.

The personal data of which you inform us is up to you. However, you can only apply using our online application form if you fill out the required fields with an asterisk, including your full name, email address and telephone number.

5. For what purposes and on what legal basis do we process personal data?

We process the personal data that you have provided to us via our online application form or by email and, if applicable, the personal data that you have made publicly available as job-related information, for the purpose of deciding on your application for employment, as far as this is necessary for the decision on the establishment of an employment relationship with us. The legal basis is § 26 (1) Sentence 1 in conjunction with (8) Sentence 2 BDSG (German Federal Data Protection Act).

Furthermore, we may process personal data about you, as far as this is required to defend against legal claims asserted against us as a result of the application process. The legal basis for this is Article

6 (1) lit. f GDPR; legitimate interest is, for example, a burden of proof to defend claims under the German Federal General Equal Treatment Act (AGG).

Insofar as an employment relationship is established between you and us, pursuant to § 26 (1) Sentence 1 BDSG we may further process the personal data you have already provided for employment purposes, if this is necessary for carrying out or terminating the employment relationship.

In addition, we will store and process your personal information for a period of 12 months from receipt of your application for the purpose of potential transmission to one or more of our portfolio companies, if you have given us your consent to do so. A transfer is only made if the respective portfolio company has a suitable vacancy. The legal basis for this is Art. 6 (1) lit. a GDPR in conjunction with § 26 (2) BDSG. You may freely revoke your consent at any time in accordance with Clause 10 lit. d) of this privacy policy.

- **Actyx AG:** <https://www.actyx.io/de/>
- **Consentio Blockchain SL:** <https://www.consentio.co/>
- **Debitos GmbH:** <https://www.debitos.com/de/>
- **Detectify AB:** <https://detectify.com/>
- **KIWI.KI GmbH:** <https://kiwi.ki/>
- **Lesara AG:** <https://www.lesara.de/>
- **Relimetrics Inc.:** <http://www.relimetrics.com/>
- **Shore GmbH:** <https://www.shore.com/de/>
- **Silexica GmbH:** <https://www.silexica.com/>
- **Wandelbots GmbH** <http://www.wandelbots.com/>
- **Bodylabs GmbH** <https://bodylabs.io/de/>
- **GraphCMS GmbH** <https://graphcms.com/>

6. What categories of data recipients are there?

We may provide your personal information to our portfolio companies in accordance with Clause 5 above, to the extent you have given us your consent to do so. Incidentally, personal data is processed on our behalf on the basis of contracts pursuant to Art. 28 GDPR, in particular by the host provider and our application management system (see Clause 9).

7. Is transfer to a third country intended?

If you have consented to the processing of your personal data for transmission to our portfolio companies as defined in Clause 5, your personal data may be transferred to a third country if there is a suitable position in one of our portfolio companies which has a registered office in a country outside the EU.

Currently, only our portfolio company Relimetrics Inc. is based outside the EU and is located in the US (San Francisco). Through the agreement of standard privacy clauses with Relimetrics Inc., there are appropriate guarantees for an appropriate level of data protection.

8. How long will your data be stored?

We store your personal information for as long as it is necessary to decide on your application. Insofar as an employment relationship between you and us does not materialise, we may also continue to store your data as far as it is necessary to defend against possible legal claims. In this case the

application documents are deleted two months after notification of the rejection decision, unless a longer storage period is required due to litigation.

If you have consented to the processing of your personal data for transmission to our portfolio companies within the meaning of Clause 5, we will store your personal data for twelve months from the date of receipt of your application.

9. Which service provider do we use for the applicant management system?

For the processing of the application information we use the Recruitee application management system, a service of Recruitee BV (company under Dutch law, company number 63881829. Headquarters: Johan Huizingalaan 763A, 1066VH, Amsterdam ("**Recruitee**"). For this purpose, your personal data will be stored and processed on Recruitee servers in the Netherlands. Recruitee processes your personal information based on an order processing contract. Recruitee has been carefully selected and attaches great importance to compliance with the applicable privacy policies.

10. Which rights do you have?

As an applicant with us you have, depending on the situation in individual cases, the following data protection rights; you may contact us at any time using the details provided in Clauses 1 and 2 in order to exercise these rights:

a. Information

You have the right to receive information about your personal data processed by us and to request access to your personal data and / or copies of this data. This includes information on the purpose of the use, the category of data used, its recipients and beneficiaries and, if possible, the planned duration of the data storage or, if that is not possible, the criteria for determining that duration.

b. Correction

You have the right to demand the immediate correction of incorrect personal data concerning you. Taking into account the purposes of processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

c. Right to object

Insofar as the processing of your personal data takes place on the basis of Art. 6 (1) lit. f of the GDPR, you have the right to object to the processing of this data at any time for reasons arising from your particular situation. We will then no longer process that personal information unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purposes of asserting, exercising or defending legal claims.

d. Right to revocation

If processing is based on consent, you have the right to revoke your consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent up to revocation. For this you can contact us at any time under the above mentioned data.

e. Right to deletion

You have the right to ask us to delete your personal information without delay, and we are required to delete your personal information immediately if one of the following is true:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed

- You file opposition to processing in accordance with Point 10.c above and there are no legitimate reasons for the processing
- You revoke your consent to the processing of personal data for processing for the purpose of transmission to portfolio companies pursuant to Clause 5 of this Privacy Policy, in accordance with Point 10.d above, unless another legal basis for the processing of your personal data exists according to Clause 5 of this Privacy Policy
- The personal data has been processed unlawfully
- The deletion of personal data is required to fulfil a legal obligation under the law of the European Union or the law of the Member States to which we are subject
- This does not apply if processing is required:
 - o to fulfil a legal obligation that requires processing under the law of the European Union or of the Member States to which we are subject
 - o to assert, exercise or defend legal claims

f. Right to restriction of processing

You have the right to require us to restrict processing if any of the following conditions apply:

- the accuracy of your personal information is contested by you for a period of time that enables us to verify the accuracy of your personal information
- the processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data;
- we no longer need your personal information for the purposes of processing, but you need it to assert, exercise or defend your rights, or
- you have lodged an objection against the processing according to Point 8.c above, and it is not yet certain whether our legitimate interests prevail over yours

If the processing referred to in this lit. f) has been restricted, such personal data may be stored only with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or due to important matters of public interest in the European Union or a Member State.

If you have imposed a restriction on the processing, we will inform you before the restriction is lifted.

g. Right of appeal

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your place of residence, employment or the place of the alleged infringement, if you believe that the processing of your personal data is contrary to GDPR.

11. Necessity of providing personal information

The provision of personal information is neither required by law nor by contract, nor are you required to provide your personal information. However, the provision of personal information is required to enter into a contract of employment with us. That is, if you do not provide us with any personal information when applying, we will not enter into any employment relationship with you.

12. Data security

All your data transmitted to us is automatically encrypted (TLS encryption). We have implemented reasonable technical and organisational measures to ensure that your personal information is processed confidentially and in accordance with the law.

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