

Propel(x) Inc.

Privacy Policy

This Privacy Policy (“**Policy**”) describes how Propel(x) Inc. and its affiliates (“Company” or “we” or “our”) treat information collected or provided in connection with an end user’s (“you” or “user”) use of the Propel(x) website located at <http://www.propelx.com> (the “**Site**”).

This Privacy Policy covers all aspects of your use of the Site.

1. Effective Date; Changes. This Policy applies to all information collected by or provided to us in connection with the Site. When we make any material changes to this Policy, we will change the Effective Date above and will inform you by e-mail sent to the address associated with your Site account and/or through the Site the next time you login. We will treat your continued use of the Site following such notice as your acceptance of the changes.

2. Third Parties. The Site may contain, and we may send to registered users, offers from third parties or links to third party websites. This Policy does not apply to information that you may provide to or that may be collected by third parties. We encourage you to request that such third parties provide you with their applicable privacy policies and other terms and conditions before engaging with or making a purchase from such third parties.

3. Collected Information

Information You Submit. When you log-in to or create an account with the Site, we collect the information you provide in the applicable form. This information includes personally identifiable information such as your e-mail address and password. When we refer to “personally identifiable information” in this Policy, we mean information that we can directly associate with a specific person or entity without additional information. To the extent you decline to share certain personally identifiable information with us, we may not be able to provide some or all of the features and functionalities found on the Site.

If you are a founder of a start-up company and are interested in having your company profiled on the Site for purposes of seeking investment, you will have to submit certain information to the Company as part of an application process. This information may include information concerning the founding team and their professional backgrounds as well as information about the company’s technology and business plan.

If you are interested in potentially investing in a start-up company through the Site, you will have to submit certain information to the Company for purposes of determining whether you are an “accredited investor,” as defined by the Securities and Exchange Commission. This information may include W-2s, tax returns and other documentation regarding your income and assets.

If you enter into an agreement to invest in a start-up company through the Site, we may collect all information that you provide relating to such transaction, including information regarding your source of funds for such transaction.

Information Collected Automatically. When you use the Site, we automatically gather certain non-personally identifiable information from you. This includes usage information, such as information on when, how often and for how long you use the Site; the investment opportunities you view, follow or invest into; the evaluation questions you ask; the amount of your investments directly into a company, and the indicative interest you express in investing into a company via a Syndicate. This also includes server log data such as the IP address, browser type, or device ID of your computer or mobile device, or the webpage you were visiting before you came to our website. As described below, we collect this information through a number of means, including server logs, cookies and other online tracking mechanisms. We may associate such non-personally identifiable information with the personally identifiable information that you provide in connection with the Site. But if we do so, we will treat the combined information as personally identifiable information.

Social Networking Information. We may allow you to link your Site account with your LinkedIn account in connection with determination of accredited investor status. When you do this, LinkedIn will provide us with access to certain information that you have provided to LinkedIn (such as your profile picture, professional experience, and connections), and we will use, store and disclose such information in accordance with this Policy. Please remember that the manner in which LinkedIn uses, stores and discloses your information is governed by the terms and conditions and privacy policies of LinkedIn, and not the Company. We also collect information about you if you interact with our blog, or with our social media accounts on Facebook, Twitter, LinkedIn, Google+, and other similar services, though we do not collect your login information from such services

Online Tracking and Cookies. The Site may use web beacons, cookies and other online tracking mechanisms to collect information. “Beacons” (also often referred to as “pixels”) are tiny graphics on a web page designed to track when a page is viewed. Beacons also can be inserted into emails in order to track certain information, including whether an email has been opened. “Cookies” are small text files containing a string of alphanumeric characters that are downloaded by your web browser or mobile device when you visit a website. We may use both session cookies and persistent cookies when you access and use the Site. Cookies may be used, for example, to remember your user account information and your preferences, to customize the interface of the Site for you and to assist us in measuring and analyzing Site traffic. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Site. Persistent cookies can be removed. Please review your browser’s documentation to learn the best way to modify your cookie settings. You can take steps to limit tracking by erasing cookies from your computer’s hard drive and by setting your browser to block all cookies or warn you before a cookie is stored. We partner with certain third parties to collect non-personally identifiable information. These third parties may use web logs, web beacons or other online tracking mechanisms, and they may set and access cookies on your computer or other device. Means of opting out of this third-party data collection are discussed below in paragraph 8.

Analytics. We use certain third party services to assist us in analysis, auditing, research, and reporting regarding the Site. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device. In particular, we use Google Analytics

and Marketo to help collect and analyze certain information for the purposes discussed in this Policy. You may opt out of the use of cookies by Google Analytics at <https://tools.google.com/dlpage/gaoptout>. Please review the Marketo privacy policy at <http://www.marketo.com/trust/legal/privacy/> for information regarding the information Marketo collects and any choices you may with respect to such collection.

4. Accredited Investor and Identity Verification. Information received through your LinkedIn account and personally identifiable information that you provide for the sole and express purpose of determining your accredited investor status (as indicated to you on the Site when you provide the information) (“**Investor Verification Information**”) is used by us for verifying accredited investor status and not for other purposes. We may use additional information, such as information from publicly available sources (such as university and company biography web pages) for verifying accredited investor status and for other similar purposes, such as vetting experts, startup founders, and Evaluation Contributors. We may disclose both Investor Verification Information and such additional information to our affiliates and third party service providers in furtherance of verifying your accredited investor status. We may also disclose or transfer Investor Verification Information and additional information as described in paragraphs 7 and 12 below. Note that we may use and disclose information we collect other than Investor Verification Information for purposes of determining your accredited investor status, but we will not use or disclose Investor Verification Information other than as described in this paragraph.

5. Use of Information

Except for Investor Verification Information (which is covered in paragraph 4 above), we use the personally identifiable and non-personally identifiable information that we collect about you as follows:

- We will use submitted information for the purposes for which you provided the information, including, for example, to verify your status as an accredited investor, to create and maintain a Site account for you or respond to a question that you e-mail to us. We also use submitted information and collected information as necessary to provide the features and functionality of the Site to you.
- We may send you e-mails regarding updates or modifications to the Site.
- We use submitted information and collected information to personalize the content that you and others see based on personal characteristics or preferences.
- We may analyze collected information relating to your use of the Site in order to help us improve the Site and develop and improve other products and services.
- We may use submitted information and collected information to help troubleshoot problems, provide you with required notices, enforce our Terms of Use or to alert you to changes in our policies or agreements that may affect your use of the Site.

- We may combine personally identifiable information collected through the Site with other information that we collect about you in other contexts—such as our communications with you via e-mail, phone or postal mail. We also may combine the information that we collect from you with information provided by third parties, such as public records, background check information, and consumer reports. We will handle such combined information in accordance with this Policy.

6. How We Disclose Information.

Except for Investor Verification Information (which is covered in paragraph 4 above), we disclose the personally identifiable and non-personally identifiable information that we collect about you as follows:

- In connection with verifying your status as an accredited investor, we may disclose your name and other submitted information to third parties as is reasonably necessary in connection with such verification.
- If you view information regarding, follow, attend a conference call regarding or otherwise indicate interest in a start-up company on the Site, the start-up company will be notified of your identity and contact information. If you invest in a start-up company or indicate a non-binding interest in a Syndicate for the purpose of investing in a start-up company on the Site, the start-up company will be notified of your identity, contact information and the details of your investment or indicative interest.
- The Site is generally designed to facilitate users contacting each other. As such, certain actions you take on the Site may cause your contact information to be displayed to another user. The Site will notify you when this may occur so that you can decide whether you want to proceed with the relevant action. For example, indicating that you “like” an answer posted by another user may cause that user to receive your contact information.
- In connection with your investment in a start-up company through the Site, we may provide your name and financial account information to a third party escrow company for purposes of completing such transactions.
- We may provide advertisers and other third parties with aggregated, non-personally identifiable information about our user base and its usage patterns.
- We may disclose non-personally identifiable information to third party partners in furtherance of our business arrangements with them, including without limitation to jointly offer a product or service to you or create interoperability between our products and services and the products and services of such partners.
- The Company uses contractors and third party service providers to provide the Site to our users and to help us provide services in connection with the Site. For example, we use third parties to help us target and implement our email communications and direct mailings. Such third parties may receive information from us for use for such purposes.

- We also may share your information with other third parties when necessary to fulfill your requests for services; to complete a transaction that you initiate; or to meet the terms of any agreement that you have with us or our partners.
- The Site may enable you to share personally identifiable information directly with websites or online services operated by third parties. For example, the Site may contain links to third-party websites that incorporate comment and social media features. The Site also may contain a Facebook “like” button, a Twitter “follow” button, and other similar social media features. If you choose to use these features, you may disclose your information not just to those third-party websites and services, but also to their users and the public more generally. Because these third-party websites and services are not operated by the Company, we are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third party websites or services, and not this Policy.
- The Site may integrate certain third-party plug-ins (such as a Facebook “like” button). Even if you do not click on these plug-ins, they may collect information about you, such as your IP address and the pages that you view. They also may set and/or access a cookie. These plugins are governed by the privacy policy of the company providing them.
- We may report aggregated, de-identified data relating to activity on this Site (including investments made in connection with the Site) to third parties or the general public. We may combine such data with data obtained from third party sources in order to generate such reports.

7. Legal Requirements and Other Special Circumstances. We will use and disclose information where we, in good faith, believe that the law or legal process (such as a court order, search warrant or subpoena) requires us to do so; to investigate, prevent, or take action regarding illegal activities, suspected fraud, or violations of our terms and conditions; or in other circumstances where we believe is necessary to protect the rights or property of Company, our users, and third parties. This may include Investor Verification Information.

8. Online Behavioral Advertising. The Site enables third-party tracking mechanisms to collect your non-personally identifiable information for use in online behavioral advertising. For example, third parties may use the fact that you visited the Site to target online ads for Company services to you on non-Company websites. In addition, our third-party advertising networks might use information about your use of the Site to help target non-Company advertisements based on your online behavior in general. For information about behavioral advertising practices, including privacy and confidentiality, visit the [Network Advertising Initiative website](#) or the [Digital Advertising Alliance website](#).

The use of online tracking mechanisms by third parties is subject to those third parties’ own privacy policies, and not this Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer, you may set your browser to block cookies. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by [opting out here](#), or of companies participating in the Digital Advertising

Alliance program by [opting out here](#). Like many websites, the Site does not currently respond to “do not track” browser headers, but you can limit tracking through these third-party programs by taking the steps discussed above.

9. Viewing and Amending Information. You can log into your Site account and view or amend your user account information at any time. Please note that while changes to your account information are reflected promptly in active user databases, our servers may retain previously provided information. Note that changes to, or deletion of, your Site account user information does not affect any other information collected by the Company, which the Company may retain and continue to use or disclose in accordance with this Policy.

10. Choices Regarding Commercial Emails. To the extent we send you commercial e-mails with marketing or promotional materials, we will give you the ability to opt-out of receiving such e-mails in accordance with applicable law. We will not provide your personally identifiable information to third parties for their own marketing purposes without your consent.

11. Security. The personally identifiable information we collect about you is stored in limited access servers. We will maintain reasonable safeguards to protect the security of these servers and your personally identifiable information. However, no security measures are 100% effective and we cannot guarantee the security of your personally identifiable information.

12. Transfer As Corporate Asset. In the event of a merger, sale of capital stock or assets, reorganization, consolidation or similar transaction involving Company, the information we possess (including personally identifiable information and Investor Verification Information) shall be transferred as a corporate asset to the acquiring entity, provided that such entity will continue to handle such information in accordance with this Policy.

13. Transfer to the U.S. Or other Countries. The Company is established in and uses facilities in the United States. Your information will be transferred to, stored, and otherwise processed in the United States or other countries where Company has facilities. The Company also may subcontract the processing of your data to, or otherwise share your data with, third parties in the United States or countries other than your country of residence. The data protection laws in these countries may be different from, and less stringent than, those in your country of residence. By using the Site or by providing any personal data to the Company, you consent to such transfer and processing of information outside of your country, even if your country has more rigorous data protection standards.

14. Children Under 13. The Company does not knowingly collect information from children under 13 and the Site is intended for adults over the age of 18. If you are a parent and believe that your child under the age of 13 has used the Site and provided personally identifiable information to us through the Site, please contact us at info@propelx.com or the mailing address at the end of this Policy and we will work to delete that Site account and any such personally identifiable information.

Effective Date: October 26, 2015

15. Contacting Us. If you have any questions about this Policy, please contact us at info@propelx.com or at:

Propel(x) Inc.
Attn: Privacy Questions
818 Mission Street, Suite 200
San Francisco, CA 94103