# Vinted Ventures Privacy Policy

Vinted, UAB ("Vinted Ventures" or "we" or "us"") cares about treating your personal data in a lawful, secure and transparent way.

We've created this Privacy Policy to help you understand how we collect and use your personal data when you interact with the Vinted Ventures services, including our website www.company.vinted.com/ventures. Read it carefully as it contains important information about your privacy and the rights relating to it.

## 1. Who is responsible for protecting your data?

Vinted Ventures is the controller of all data collected while you interact with us in the context of investments, as well as when you interact with our website, and takes full responsibility for protecting this data.

Vinted Ventures has a designated data protection officer. If you have any questions, comments or complaints regarding how we collect, use and store your personal data, or if you want to assert any of your privacy rights (see Section 7 below), reach out to us via our **contact details below:** 

#### Vinted, UAB

Identification number: 305959706

Address: Švitrigailos st. 13, Vilnius 03228, Republic of Lithuania

Email: privacysupport.vintedventures@vinted.com

# 2. What data do we collect and why?

#### 2.1. To ensure the functionality of our website

**Purpose.** We collect, use and store the data that is necessary for our website to function properly (for example, to remember your privacy preferences, allow you to fill in forms, etc.).

**Data categories.** With the help of strictly necessary cookies, we collect, use and store the data about your use of our website.

**Legal basis.** We collect, use and store the data lawfully because it is necessary for the legitimate interest of Vinted Ventures to ensure the functionality of our website (Article 6(1)(f) of the GDPR).

**Retention period.** We keep the data for this purpose until the relevant cookies expire, usually until you close your browser or for a maximum of one year.

# 2.2. To respond to your requests and applications made via the "Get in Touch" contact form

**Purpose.** When you submit a "Get in Touch" form or reach out to us by other means, we collect, use and store the data that is necessary to assess your request and respond to it including investment-related considerations.

**Data categories.** For this purpose, we collect, use and store the data contained in your request, such as your full name, contact details, professional information (such as your role in the company etc.), company details (such as financial information, business model, team composition, etc.), and the content of your message.

**Legal basis.** We collect, use and store the data lawfully because it is necessary for the legitimate interest of Vinted Ventures to establish and maintain contact with customers, partners and other interested persons (Article 6(1)(f) of the GDPR).

**Retention period.** We retain your data for as long as it is needed for the purposes of assessing your request and making investment-related considerations. Typically for up to 15 years after our last interaction.

#### 2.3. To exercise your privacy rights

**Purpose.** If you send us a request, complaint or other enquiry in relation to your privacy rights (see Section 7 below), we collect, use and store the data that is necessary to handle the enquiry and take appropriate action.

**Data categories.** For this purpose, we collect, use and store the data contained in your enquiry, in addition to any other data held by Vinted Ventures as necessary to respond to a specific enquiry.

**Legal basis.** We collect, use and store this data lawfully because it is necessary for compliance with a legal obligation to which Vinted Ventures is subject (Article 6(1)(c) of the GDPR).

**Retention period.** We keep the data for this purpose for 2 years after resolving the enquiry.

#### 2.4. To defend our rights and interests

**Purpose.** If you get involved in a dispute with us or we need to otherwise defend, enforce, exercise and uphold our rights or legitimate interests, we collect, use and store the data that is necessary for the specific case.

**Data categories.** For this purpose, we collect, use and store all data we hold about you as necessary for the specific case.

**Legal basis.** We collect, use and store the data lawfully as it is necessary for the legitimate interest of Vinted Ventures to defend its rights and interests (Article 6(1)(f) of the GDPR).

**Retention period.** We keep the data for 5 years after we identify the need to defend our specific rights and interests, and, in the case of a dispute, until the final execution of the binding decision of the authorised body.

# 3. Where do we get your data from?

We may get your data from a few different sources:

- From you directly.
- From our partners and service providers.
- Sometimes, we might receive it from government institutions, for example, when you file a complaint.

# 4. Do we share any data about you?

We only share your personal data with the following recipients when it is permitted by applicable laws and necessary for the purposes set out in Section 2:

- Vinted, UAB, Vinted Go, UAB and Vinted Limited (the international group of companies to which Vinted Ventures belongs).
- IT maintenance, customer relationship management, technical support, cloud hosting, information security, communication, translation, consultancy, financial, legal, advertising, and other service providers.
- Law enforcement, supervisory and other public authorities.

# 5. Do we disclose any data about you outside the European Economic Area?

In most cases, your data is processed within the territory of the European Economic Area (EEA). However, some of our service providers are established outside of this territory, which may result in your data being transferred to third countries (e.g. USA). Where permitted by applicable laws and necessary for the purposes set out in Section 2, we share your data with the following recipients outside the EEA:

- Google LLC (USA) communication software provider (your data is protected by the service provider entering into the Standard Contractual Clauses as approved by the European Commission)
- Attio Limited (UK) customer relationship management platform (the destination country offers an adequate level of data protection as recognised by the European Commission)

## 6. What privacy rights do you have?

The GDPR and other laws provide you with certain rights. Subject to conditions and limitations, you have the right to:

- Submit a request for confirmation as to whether Vinted Venture so processes your personal data. If
  Vinted Ventures processes your personal data, you can request access to it and certain explanations
- Submit a request to correct inaccurate or incorrect personal data or to supplement it when it is not complete
- Submit a request to delete your personal data held by Vinted Ventures
- Submit a request to restrict the processing of your personal data
- Object, on grounds relating to your particular situation, to collection, use and storage of your personal data when Vinted Ventures processes it on the basis of legitimate interest
- Withdraw your consent to our use of your data.
- Lodge a complaint with a supervisory authority, in particular in the country of your habitual residence or place of an alleged infringement of the GDPR, and seek a judicial remedy

If you'd like to exercise any of your privacy rights, reach out to us using the contact details in Section 1 above.

# 7. Changes to this Privacy Policy

We will notify you whenever we update this Privacy Policy by posting a new version on this page and identifying the date of update. In case of material changes to this Privacy Policy, we will take additional steps to make sure you are made aware of them.