

Document title:

**Artha Website Privacy Policy
(GDPR compliant)**

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Introduction

Welcome to the Artha Impact's privacy notice.

Artha Impact respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. [IMPORTANT INFORMATION AND WHO WE ARE]

2. [THE DATA WE COLLECT ABOUT YOU]

3. [HOW IS YOUR PERSONAL DATA COLLECTED]

4. [HOW WE USE YOUR PERSONAL DATA]

5. [DISCLOSURES OF YOUR PERSONAL DATA]

6. [INTERNATIONAL TRANSFERS]

7. [DATA SECURITY]

8. [DATA RETENTION]

9. [YOUR LEGAL RIGHTS]

10. [GLOSSARY]

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Artha Impact collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, pre-register your profile on our Website, exchange information with other users through the use of our workflow tools, or engage in our social network.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Artha Impact as a program associated with Rianta Capital Zurich (“RCZ”) is the controller and responsible for your personal data (collectively referred to as “Artha”, “we”, “us” or “our” in this privacy notice).

This privacy notice is issued on behalf of Artha Impact so when we mention “Artha”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant program under the Rianta umbrella responsible for processing your data. Artha Impact is the controller and responsible for this website.

We have in place a protocol for data protection and a designated officer responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact us using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Artha Impact (Rianta Capital Zurich)

Contact Person: Audrey Selian

Email address: info@arthaimpact.com

Postal address: Ramistrasse 6, 8001 Zurich - Switzerland

You have the right to make a complaint at any time to the Federal Data Protection and Information Commissioner (FDPIC), the Swiss supervisory authority for data protection issues (<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html>). We would, however, appreciate the chance to deal with your concerns before you approach the FDPIC so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on November 9, 2019 [and historic versions may be obtained by contacting us.

The data protection laws in Europe changed on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may need some extra time to respond to some of your requests (for example, a request for the transfer of your personal data).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party users and websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, or gender.
- **Contact Data** includes professional address, delivery address, email address, social media handle and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from or through us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, network activity or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services. This may also include an activity log.
- **Marketing and Communications Data** includes your preferences in receiving marketing or recommendations from us and our third parties and your communication preferences.

We may also in the longer term collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose, although we do not currently do so today. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific network feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. It is important to note that ours is a social network and therefore the

interactions you enter into with others on our platform are not within the purview of our responsibility from a data or transaction perspective.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
 - apply / pre-register on our platform to set up a user profile;
 - apply to access on or another of our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request to be subscribed to newsletters or other updates to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties [and public sources] as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers, such as Google based outside the EU;
 - (b) search information providers, such as LinkedIn based [inside **OR** outside] the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services, such as various deal flow / social impact platforms based [inside **OR** outside] the EU.
 - Identity and Contact Data from publicly available sources, such as Companies House and the Electoral Register based inside the EU.
 - Attendee lists from industry / sector / ecosystem conferences and gatherings at which we are present.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform any contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us or unsubscribing directly from such mailers.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us with any questions related to the below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user	(a) Identity (b) Contact	Performance of an informational exchange/ contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us as licensee	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us, if any)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review, provide feedback on a user profile or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a webinar showcase, competition or complete a survey. To enable you to participate in facilitated due diligence work flows.	(a) Identity (b) Contact (c) Profile (d) Usage / Activity (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network

analysis, testing, system maintenance, support, reporting and hosting of data)	(c) Technical	security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may contact us at any time to discuss personal data control mechanisms, all of which are at your fingertips in our system under “Edit Profile” functions.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased [goods or services] from us [or if you provided us with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Artha umbrella of initiatives / companies for marketing purposes. These would include Artha Networks Inc, Impact for Breakfast, and Rianta Capital Zurich, all of whom are tied together.

Opting out

You can ask us (or any third parties) to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your preferences or by following the opt-out links on any marketing message sent to you or] by contacting us at any time].

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a transaction undertaken on or through the system, product/service experience or other transactions].

Cookies

[You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties, which may include the likes of peer impact investors who are engaged in our portfolio management work, or other co-conveners who may wish to organized collaborative events offline or online. [As defined in Glossary Section 10, below]
- External Third Parties, which may include network and event conveners, and/or the third party service providers whose interest may be in bidding upon 'tender offers' from investors in search of support on a given pipeline project or other opportunity. [As defined in Glossary Section 10, below]
- Specific technically external third parties who would see the same information we do would include Menterra Ventures and their related Villgro.org team based in India.
- Third parties to whom we may one day in the future choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their

own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

In principle, your data on Artha resides in and on UK servers.

We may eventually share your personal data with peer impact investment platforms or social innovation partner platforms like <http://conveners.org> (or others) who are party to collaborative standards that we have been a participant in creating. This may involve transferring your data outside the European Economic Area (**EEA**). All Users will be notified before this occurs and will have the option to opt-out.

We strive to ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

[A great many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your data may involve a transfer of data outside the EEA.]

Whenever personal data is transferred out of the EEA, we strive to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we may work with providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, entities, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six [6] years after they cease being customers for [tax] purposes.]

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information. Otherwise, in general it is archived.

In future, we may need to anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. This is not currently (as of November 2019) something we do.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [*Request access to your personal data*].
- [*Request correction of your personal data*].
- [*Request erasure of your personal data*].
- [*Object to processing of your personal data*].
- [*Request restriction of processing your personal data*].
- [*Request transfer of your personal data*].
- [*Right to withdraw consent*].

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we reserve the right to and may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a facilitated interaction on our platform or a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies associated closely with Artha Impact and RCZ [acting as joint controllers or processors] and who are based in the UK, India, or the United States and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers [acting as processors] based in the UK, India or any number of other countries in which tenant platforms based on Artha architecture are launched and who provide IT and system administration services.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based in the UK, India, the United States, or any number of other countries who provide consultancy, banking, legal, insurance and accounting services.

Partner organizations who may provide market research or benchmark data, or who may support our platforms through offers of integration such that debt lending (in particular) be enabled, including companies like LendEnable, Loans4SMEs, etc.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You may also always view and edit this data when you log into our systems directly.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. You may also edit your personal data directly upon login.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. We will endeavour to anonymize your role in any collaborative interaction you may have engaged in on our social network, to the extent possible, such that previous data streams are not affected.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is some aspect about your particular situation which drives your objection to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In rare cases, we may demonstrate that we may have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish data accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.