



Personal Data Privacy Policy

This Personal Data Privacy Policy ("Privacy Policy") describes how Mitrax LLC, "**Mitrax**", or whoever delegates, collects, uses, discloses and transfers the information you provide to us or that we collect about you when you access and use our website at <https://www.mitraxcapital.com/> (the "**Mitrax Website**"), in the framework of various services, tools applications, websites and marketing actions which are provided or operated by us or on our behalf (the "**Services**").

The aim of this policy is to describe how and why we collect your personal data. We will also inform you of what we do with this data, with whom we share it, how we protect it and the choices you can make.

This policy does not apply to the privacy practices of companies we do not control (including any portfolio companies), nor to any information obtained or collected in connection with a separate business relationship with **Mitrax** or its affiliates, including as an investor in an **Mitrax** investment funds, an employee of **Mitrax's** portfolio companies or as a service provider. The policy will also contain general rules and explanations regarding this processing.

This Policy applies to all your personal data collected by (or on behalf of) **Mitrax** through **Mitrax Mitrax Website**, referred to in this Policy as "**Mitrax**", "we", "us" and "our".

I. RESPONSIBLE FOR THE DATA

Mitrax LLC with EIN **35-2851373**, we are incorporated in the United States of America. For any questions, requests, complaints concerning the application of this policy, or to exercise your rights, as described in this policy, you may contact us at the Data Protection Contact:

Address: 919 N Market Street, Suite 950, Wilmington, Delaware.

Email: thrivecapital@mitraxcapital.com

II. KEY PRINCIPLES

We value the personal data entrusted to us and are committed to processing your personal data in harmony with the data protection laws and regulations to which **Mitrax** is subject, the Delaware Personal Data Privacy Act and other non-federal law



that may apply to the collection of personal data from consumers in those states (“Data Protection Laws”). The terms “personal data” and “personal information,” as used herein, refers specifically to information that identifies a visitor to the **Mitrax Website**, or which (which may includes contact information and also any information referred to as “Personal Information” under the Delaware Personal Data Privacy Act (“DPDPA”).

We will aim to adhere to the following key principles:

- **Lawfulness:** We will only collect your personal data in a fair, lawful and transparent manner.
- **Purpose limitation:** We will only collect your personal data for specified, explicit and legitimate purposes and not process your personal data further in a way incompatible with those purposes.
- **Accuracy:** We will keep your personal data accurate and up to date.
- **Data security and protection:** We will implement technical and organizational measures to ensure an appropriate level of data security and protection considering, amongst other things, the nature of your personal data to be protected. Such measures provide for the prevention of any unauthorized disclosure or access, accidental or unlawful destruction or accidental loss, or alteration and any other unlawful form of processing.
- **Access and rectification:** We will process your personal data in line with your legal rights.
- **Retention limitation:** We will retain your personal data in a manner consistent with the applicable Data Protection Laws, and no longer than is necessary for the purposes for which they have been collected.

III. USE OF PERSONAL INFORMATION

We collect the following personal information depending on your type of interaction with the Mitrax Website:

1. Visitors

While portions of the **Mitrax Website** may be used without registration, your use of the Services and much of the content on the **Mitrax Website** requires registration. You may choose not to provide us with any personal information. However, you may not use the portions of the **Mitrax Website** that require your personal information and registration.



If you use our website as a visitor without registering or submitting inquiry information to us, the only information we collect will be automatic tracking information and information collected by cookies, which helps us understand what you are seeing and responding to on our website.

1.1. Information We Collect Automatically

Even if you do not register on the **Mitrax Website**, we collect information about your use of our **Mitrax Website** in order to further personalize the content and information we present to you.

1.1.1. Cookies: "Cookies" are small computer files that are transferred to your computer, mobile device or tablet and contain information such as:

- a.** User ID and User Preferences
- b.** pages you have visited and the activities you have performed while using the website.

We use "session cookies" to personalize your experience on the website and, if you create a password, we use "persistent cookies" to store your password so that you do not have to re-enter it each time you visit the website. We do not link the information stored in cookies to any of your personal information that you submit while on the website. You can block cookies or delete them from your browser; However, by disabling cookies, you may not have access to all of the website's features. You also have the option to browse our website using free cookie blockers or the "Incognito Mode" feature in Chrome. We do not have access to or control over these cookies.

1.1.2. Traffic Data: We automatically track and collect the following categories of information when you visit our website: (1) Internet Protocol (IP) addresses; (2) domain servers; (3) computer, device, and connection information, such as browser type and version, operating system, mobile platform, and unique device identifier (UDID) and other technical identifiers; (4) Uniform Resource Locator (URL) clickstream data, including date and time stamp, referring and exit URLs, search terms you used, and pages you visited or searched for on the Service; (5) in the case of location-aware Services, the region, city, or town where your device is located in order to provide you with content that is more relevant to where in the world you are located; (5) referral source that



may have submitted you to the **Mitrax Website**; and (6) other information associated with your browser and website interaction. If you are using a mobile device or other device to visit the **Mitrax Website**, we may collect device-related hardware information about you.

1.2. Registered users and prospects.

Registered users are those visitors to our website who register their personal information to receive information and commercial communications regarding our products and services.

By prospects, we mean those individuals or companies who have shared their contact information with us, either through a form on the website, from information collected at a commercial or marketing event, or have contacted us directly.

For both prospects and registered users, we may collect the following information:

- 1. Contact Information:** Information that can personally identify you, including, but not limited to, name, email address, telephone number, and other contact information.
- 2. Professional Information:** Information related to your work experience, education, position, organization, management, among others.
- 3. Demographic Information:** Your age, gender, country of residence, and other demographic information.
- 4. Information of interest:** To collect general information relating to your business objectives, your investment interests, financial objectives and user preferences and information about participation on the website and at events.

We may also collect information that personally identifies you when you send us emails or communicate with us (for example, when you send us email communications or send us letters, or make inquiries on our website)

Use of Personal Information:

- a.** We use personal information to manage our relationship with you, including responding to your questions and communicating on social media, providing you with the specific Services you select.

- b. **Assessing your suitability as an investor:** We collect and use your personal information to assess whether you meet the Fund's investment criteria.
- c. **Communicate:** We collect and use your personal information to communicate with you about our investment opportunities, events, and other relevant information.
- d. **Comply with our legal and regulatory obligations:** We collect and use your personal information to comply with our legal and regulatory obligations.

1.3. Partners/Investors - Consumers

Partners or investors (the “**Consumers**”) are those persons who are contractually or legally bound to the fund, so they have shared personal information, by any means provided by **Mitrax**, mail, communications, form on the website, or documents.

The personal information collected for **Consumers** is:

1. **Contact Information:** Information that can personally identify you, including, but not limited to, name, email address, telephone number, and other contact information,
2. **Professional Information:** Information related to your work experience, education, position, organization, management, among others.
3. **Information of interest:** To collect general information relating to your business objectives, your investment interests, financial objectives and user preferences and information about participation on the website and at events.
4. **Financial information:** Net worth, income, investors, and other financial information.
5. **Demographic Information:** Your age, gender, country of residence, and other demographic information.

Use of Personal Information:

- a. We use personal information to manage our relationship with you, including responding to your questions and communicating on social media, providing you with the specific Services you select.
- b. **Communicate:** We collect and use your personal information to communicate with you about our investment opportunities, events, and other relevant information.

- c. **Managing Our Investor Relations:** We collect and use your personal information to manage our existing investor relationships.
- d. **Comply with our legal and regulatory obligations:** We collect and use your personal information to comply with our legal and regulatory obligations.

IV. Legal basis for processing

We will only process your personal data lawfully and will explain the specific legal basis for which we process your data within this privacy policy. We will not process your personal data further in a way that is incompatible with those purposes.

Please note that in accordance with applicable Data Protection Law, your personal data can be processed if:

- you have given us your consent for the purposes of the processing; or
- it is necessary for the performance of a contract to which you are a party; or
- we have a legitimate interest that is not outbalanced by your privacy rights; or
- it is required under a legal obligation to which we are bound.

For the avoidance of doubt, you will always have the right to withdraw your consent at any time.

V. DISCLOSURE OF YOUR INFORMATION

By registering on our website, you agree that we may share certain categories of information we collect from you in the ways described in this Privacy Policy.

We share personal information and traffic data with our business partners who help us perform basic services (such as website hosting, data storage, and security) related to our operation of the website and/or by making certain services available to our users. Those business partners will be required to maintain the same standards of security and confidentiality that we have



promised you in this Privacy Policy, and will only use your contact details and other personal information to fulfill their specific business obligations and provide you with website-related services, **Mitrax** does not share, sell, rent, or trade your personal information with third parties for promotional purposes.

We reserve the right to disclose your personally identifiable information as required by law and when we believe disclosure is necessary to protect our rights or property, to mitigate our liability in an actual or potential lawsuit, to comply with a judicial proceeding, court order, or legal process served on our website, to enforce this Privacy Policy or our Terms of Use or any other agreement in effect between you and **Mitrax**, or to investigate and prevent unauthorized transactions or other illegal activities.

VI. PERIOD OF PROCESSING OF PERSONAL DATA.

Mitrax will only keep your personal data for as long as necessary for the purposes for which we process your personal data or to comply with the law. For information on how long certain personal data is likely to be kept before being removed from our systems and databases, please contact us at the Data Protection Contact.

VII. DECLARATIONS OF THE PROCESSING OF PERSONAL DATA.

Mitrax processes data under this Privacy Policy on the basis of (a) the user's consent as a condition of accessing this website; (b) the need for the data to enter into a contract for Services; and/or (c) the need for the data for the provision of the Services. **IF YOU DO NOT CONSENT TO THE PROCESSING OF YOUR DATA FOR THE PURPOSE OF ACCESSING AND USING THE WEBSITE, PLEASE DO NOT USE OR INTERACT WITH THE WEBSITE.**

7.1. Cross-border transfer.

The data centers that host your data under this Privacy Policy are located inside and outside the United States. Accordingly, you consent to the cross-border transfer of your data in order to receive access to the **Mitrax Website** and/or Services.

VIII. HOW YOU CAN ACCESS, AMEND, OR DELETE YOUR PERSONAL DATA

If you wish to review, correct, update, delete, delete, or otherwise limit our use of the personal data you have provided to us, you may submit a request by contacting us using the email thrivecapital@mitraxcapital.com. For your protection, we may need to verify that the request is valid. We will attempt to comply with your request within a time consistent with applicable law.

If you completely delete all of this information, your account may be deactivated. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that are pending

IX. CHANGES TO THIS PRIVACY POLICY

We may occasionally make alterations to this policy which will reflect how we process and look after your data. We reserve the right, at any time, to add, change, update, or modify this Privacy Policy, so please review it frequently. If we make a material change to our Privacy Policy, we will notify you by email, here on this page, as well as by posting a notice on our website. In all cases, the use of the information we collect is subject to the Privacy Policy in effect at the time such information is collected. If you do not agree with any changes or modifications to the Privacy Policy, please do not continue to use the **Mitrax Website**. You will be deemed to have consented to any modification to the Privacy Policy when you use the **Mitrax Website** after the effective date of the modification.

X. CONTACT INFORMATION

If you have any questions about this Privacy Policy, or about your dealings with this website, or would like to request access to or changes to our processing of your data, or make a complaint, please contact us at thrivecapital@mitraxcapital.com