

## PRIVACY POLICY

Last updated: 28-3-2025

### GENERAL

This Privacy Policy applies to all collected and processed personal data that you have provided to us, or we have collected as a part of delivering our services/products. **"Personal Data"** means any information relating to an identified or identifiable natural person.

### IDENTITY OF THE DATA CONTROLLER

If there are any questions regarding this Privacy Policy, you may contact us using the information below.

The Startup Valuator ApS  
Reg. no.: 45349470  
Gammel Hareskovvej 271B, Hareskov  
3500 Værløse  
Denmark

Attn: Thor Hauberg  
th@thestartupvaluator.com  
+45 20499210

We are processing your personal data in accordance with the General Data Protection Regulation (GDPR) and any national regulation applicable to us.

### PURPOSE OF PROCESSING

#### **Non-sensitive personal data**

We collect the following non-sensitive personal data about you when you sign up and/or use our services as a customer/user:

- NAME
- ADDRESS
- E-MAIL
- COUNTRY
- TITLE
- BANK ACCOUNT DETAILS
- POSITION
- AREA OF WORK
- WORKPHONE
- DATE OF BIRTH
- COMPENSATION DETAILS

We process non-sensitive personal data on the basis of Article 6 in the GDPR, more specifically, our legal basis for collecting and processing personal data is for each service outlined below:

*The processing of your data is either based on:*

- Consent – processing is based on an obtained consent from you.
- Contract – processing is necessary to fulfil a contractual obligation with you or entering into such obligation.
- Legitimate interest – processing occurs to pursue a legitimate interest for us.

If the processing is based on your consent, you may at any time withdraw your consent by contacting us.

## TRANSFER OF PERSONAL DATA

We do not share or transfer your personal data to a country or territory outside the EU/EØS.

We will not share your personal data to any third-parties without your consent, unless it is specifically stated or required by law that we do so.

## PROFILING AND AUTOMATED DECISION MAKING

Our processing activities do not include profiling.

Our processing activities include automated decision-making in connection with the assessment of valuations. This involves, however is not limited to, analyzing various input parameters provided by the customer/user, such as financial metrics, market potential, competitive landscape, and team composition. The automated decision-making process utilizes algorithmic models and data analytics to generate an estimated valuation.

## BUSINESS TRANSFERS

In the event of an actual or contemplated transfer of our company or our assets, or if we discontinue our business or enter into bankruptcy proceedings, we will include data, including your personal information, among the assets transferred to any parties who acquire us or such assets may be the subject of review (due diligence) by such parties (or their representatives). You acknowledge that such transfers may occur, and that any parties who acquire, or contemplate to acquire, us may, to the extent permitted by applicable law, continue to use your personal information according to this policy, which they will be required to assume as it is the basis for any ownership or use rights we have over such information.

## USE OF PERSONAL DATA

We only process your personal data as stated in this privacy policy and we do not use your personal data for any other purpose than explicitly described above or communicated directly to you elsewhere.

We process your personal data in a lawful, fair and transparent manner. The data we collect is solely used for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

All use of your personal data is relevant and limited to what is necessary in relation to the purposes for which they are processed.

## SECURITY

When we store and process personal data that we have received from you, we always take every step possible to store it in a secure manner. However, we cannot guarantee that your data is 100% secure as we cannot guarantee that the data will not be accessed or otherwise misused as a result of an unlawful act or similar. We do take necessary precautions to keep your data safe. When you give us access to - or transfer personal data to us - you do so at your own risk.

The following security measures are in place to keep your data safe:

- End-to-end encryption
- Internal policies & password protection

## ACCESS TO YOUR INFORMATION

### Right to access

GDPR Article 15: You have the right to obtain a confirmation from us as to whether or not personal data concerning you is being processed, including information on the purpose-, categories-, recipients-, and time of storage of the processing.

### Right to rectification

GDPR Article 16: If you figure out, that the data that is being processed about you is inaccurate or incomplete, you have the right to get that data rectified. We will communicate any rectification or erasure of personal data to any recipient to whom the personal data has been originally disclosed, unless it proves impossible according to Article 19.

### Right to erasure and restriction of processing

GDPR Article 17: You also have the right to get your personal data erased, if the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed. Please see Article 17 for the full list of reasons for your right to erasure.

### Right to restriction of processing

GDPR Article 18: You have the right to restrict the processing of your personal data if it is (i) inaccurate; (ii) unlawful; (iii) the purpose of the processing has changed; or (iv) you have objected to the processing according to Article 21.

### Right to data portability

GDPR Article 20: You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format. You can also request that we transmit your data to another party.

#### Right to object

GDPR Article 21: You have the right to object to the processing of your personal data if it is being used for profiling or direct marketing purposes.

#### SUB-PROCESSORS

We use data processors to be able to deliver our services and run our business. We have listed the various categories of handling, its purposes and the supplier in the below table:

<b>Category</b>	<b>Purpose</b>	<b>Sub-processors (or a similar and identifiable service)</b>
Data storage and transformation.	Data storage and transformation.	MICROSOFT DANMARK ApS Reg. no.: 13612870 Kanalvej 7, 2800 Kgs. Lyngby Denmark

#### CONTACT INFORMATION, REQUESTS & COMPLAINTS

If you want to exercise any of your above rights, please contact our Data Protection Responsible/ Data Protection Officer:

The Startup Valuator ApS  
Reg. no.: 45349470  
Gammel Hareskovvej 271B, Hareskov  
3500 Værløse  
Denmark

Attn: Thor Hauberg  
th@thestartupvaluator.com  
+45 20499210

If you find that your personal data has been processed in a way that does not meet the requirements of the GDPR and if you want to file a complaint, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will guide you through the process. See contact information below:

Datatilsynet  
Carl Jacobsens Vej 35  
2500 Valby

Denmark  
dt@datatilsynet.dk  
+45 33 19 32 00