

Venture Simulations Ltd (Trading as 'SimVenture')

Last updated: July 2024

Privacy Policy

The following Privacy Policy applies to the use of Validate.

This privacy policy governs our policies regarding the collection, use and disclosure of personal data when you use our Application and the choices you have associated with that data.

The Application obtains the information you provide when you download and register the Application. You will not be able to use the features offered by the Application unless you register with us.

When you register with us and use the Application, you generally provide (a) your name, email address, password, and optional profile picture; (b) information you provide us when you contact us for help; information you enter into our system when using the Application, such as contact information, project management information and your business ideas.

We may also use the information you provide to us to contact you from time to time to provide you with necessary information regarding the platform.

How we use collected data

We use the collected data for various purposes:

To provide and maintain the Service

To notify you about changes to our Service

To allow you to participate in interactive features of our Service when you choose to do so

To provide customer care and support

To provide analysis or valuable information so that we can improve the Service

To monitor the usage of the Service

To detect, prevent and address technical issues

The above usage of your data constitutes lawful processing of data, defined as "<u>legitimate</u> <u>interests</u>" by the Information Commissioner's Office (ICO).

Administrators may also be able to view your data collected. This is to enable them to provide support and to track progress. We will only grant Administrator permissions to appropriate SimVenture staff or those with legitimate interests to view your data e.g. university staff and course leaders.

Other Data Collection information

In addition, the Application may collect certain information automatically, including, but not limited to, the type of device you use, your IP address, your operating system, the type of Internet browsers you use, and information about the way you use the Application.

This Application does not collect precise information about your location.

Only aggregated, anonymized data is periodically transmitted to external services to help us improve the Application and our service. We will share your information with third parties only in the ways that are described in this privacy statement.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

Session Cookies - We use Session Cookies to operate our Service.

Preference Cookies - We use Preference Cookies to remember your preferences and various settings.

Security Cookies - We use Security Cookies for security purposes.

Analytics Cookies - We may use Analytics Cookies to track information on how the Service is being used. For example, Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: https://policies.google.com/privacy?hl=en

We may disclose User Provided and Automatically Collected Information:

as required by law, such as to comply with a subpoena, or similar legal process;

when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;

with our trusted services providers who work on our behalf, who do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement.



if we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

Handling your personal data

You can stop all collection of information by the Application and delete all of your personal data easily by deactivating your account.

We will retain User Provided data for as long as you use the Application and for a reasonable time thereafter. We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate. If you'd like us to delete User Provided Data that you have provided via the Application, please contact us at validate@simventure.co.uk and we will respond in a reasonable time. Please note that some or all of the User Provided Data may be required in order for the Application to function properly.

We do not use the Application to knowingly solicit data from or market to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at validate@simventure.co.uk. We will delete such information from our files within a reasonable time.

We want to always safeguard the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. We also store data on secure servers that comply with GDPR such as Amazon Web Services and Digital Ocean. Please be aware that although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

This Privacy Policy may be updated from time to time for any reason. Users can access the current version at any time by visiting https://app.validatestartup.com/privacy. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes.

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United Kingdom and process and store it that country. Data processing might also happen in other countries outside of the United Kingdom where a transfer of personal data is required to meet our purposes, and where there are UK 'adequacy regulations' in relation to the country or territory where the receiver is located or a sector which covers the receiver. Alternatively, data processing may occur where we have undertaken a risk assessment and are satisfied that the data subjects of the



transferred data continue to have a level of protection essentially equivalent to that under the UK data protection regime. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information. Personal data will be transferred to and stored there under United Kingdom privacy standards.

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at validate@simventure.co.uk.

