

# Solvenda Capital Solutions – Global Privacy Policy

Last Updated: November 2025

# 1. Introduction and Purpose

Solvenda Capital Solutions ("Solvenda," "we," "our," or "us") is committed to protecting the privacy and confidentiality of personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you visit our website <a href="www.solvendacapitalsolutions.com">www.solvendacapitalsolutions.com</a>, communicate with us, or engage with our capital advisory and funding services.

This policy applies globally to all users, clients, partners, and website visitors ("you," "your") regardless of location. It reflects our compliance with the EU General Data Protection Regulation (GDPR), the UK Data Protection Act 2018, the California Consumer Privacy Act (CCPA), and other applicable international privacy regulations.

We encourage you to read this policy carefully so that you understand how and why we process your personal data and how you can exercise your privacy rights.

#### 2. Who We Are – Data Controller

Solvenda Capital Solutions S.à r.l. acts as the **data controller** for personal data collected via our website and related services.

#### **Registered Address:**

Solvenda Capital Solutions S.à r.l. Luxembourg, Luxembourg

#### **Contact Information:**

Email: info@solvendacapitalsolutions.com Website: www.solvendacapitalsolutions.com

If you have any questions, concerns, or complaints about this policy or our handling of your data, please contact us using the above details.

#### 3. Data We Collect

We may collect, store, and use the following categories of personal information depending on your relationship with us and your use of our website:



# A. Information You Provide Directly

- Name, title, and contact details (email address, phone number, company name, job title).
- Inquiry details submitted through our contact forms or via email correspondence.
- Information provided during calls, meetings, or events.
- Billing or financial details (for service contracts).
- Preferences related to communication and marketing.

#### **B.** Information Collected Automatically

When you use our website, we may collect technical data automatically, including:

- IP address, browser type, operating system, and device identifiers.
- Usage data such as pages visited, time spent, referral URLs, and clickstream patterns.
- Cookies and similar tracking technologies (see Section 9 below).

#### C. Information from Third Parties

We may receive information from:

- Business partners or referrers.
- Public databases and professional networking platforms (e.g., LinkedIn).
- Regulatory or compliance sources to verify identity or prevent fraud.

We do not intentionally collect or process sensitive personal data (such as racial or ethnic origin, political opinions, or health data) through our website unless explicitly required and with your consent.

### 4. How We Use Your Personal Data

We use your data for legitimate business purposes, including:

#### 1. To provide and manage our services:

- o Responding to inquiries and client requests.
- o Conducting financial advisory, funding analysis, and business development.

# 2. To maintain business relationships:

o Managing contracts, communications, and ongoing client support.

#### 3. To comply with legal or regulatory obligations:

- o Performing anti-money laundering (AML) and due diligence checks where required.
- Maintaining records for tax, audit, and legal compliance purposes.

### 4. To communicate and market responsibly:

 Sending newsletters, event invitations, and relevant updates (subject to consent or legitimate interest).



#### 5. To improve our website and user experience:

o Monitoring and analyzing website traffic and engagement.

We will not use your personal data for purposes that are materially different from those described in this policy unless we obtain your consent or have a lawful reason to do so.

# 5. Legal Bases for Processing

We process personal data only when permitted by law. The lawful bases include:

- Contractual necessity: Processing to perform a contract or take steps before entering one.
- **Legal obligation:** Processing required by law, regulation, or court order.
- **Legitimate interest:** Processing necessary for our business interests (e.g., marketing, security, or service improvement) provided your rights do not override those interests.
- **Consent:** When you voluntarily agree to a specific use of your data (e.g., for marketing communications).

You can withdraw your consent at any time by contacting info@solvendacapitalsolutions.com.

# 6. Data Sharing and International Transfers

We may share your data with carefully selected third parties, including:

- Professional advisers, consultants, auditors, and service providers (e.g., IT, hosting, CRM).
- Regulatory or governmental authorities where legally required.
- Business partners or counterparties in transactions you authorize.

Whenever personal data is transferred outside the European Economic Area (EEA) or UK, we ensure appropriate safeguards are in place such as:

- EU Standard Contractual Clauses (SCCs) approved by the European Commission.
- Transfers to jurisdictions recognized as providing an adequate level of protection.
- Binding corporate rules or equivalent safeguards.

We require all third-party service providers to implement appropriate security and confidentiality measures consistent with this policy and applicable data protection laws.



### 7. Data Retention and Security

#### **Retention:**

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal, regulatory, or contractual obligations.

- Inquiry and correspondence data: up to 3 years after the last contact.
- Client and transactional data: up to 10 years after contract termination or as legally required.

#### **Security:**

Solvenda employs industry-standard technical and organizational measures to safeguard data against unauthorized access, loss, misuse, or alteration.

These measures include:

- Encrypted communications (SSL/TLS).
- Restricted access controls.
- Secure data storage and disposal procedures.
- Regular monitoring and system integrity testing.

Despite our efforts, no transmission over the internet is entirely secure. You acknowledge that the transmission of your data to us is at your own risk.

## 8. Your Rights

Depending on your jurisdiction, you may have the following rights:

- Access: Request a copy of personal data we hold about you.
- Correction: Request correction of inaccurate or incomplete data.
- **Erasure:** Request deletion of your data when it is no longer needed or processed unlawfully.
- **Restriction:** Request limitation on how we process your data.
- Portability: Receive your data in a structured, machine-readable format.
- **Objection:** Object to data processing for legitimate interests or direct marketing.
- Withdrawal of consent: Withdraw consent where processing is based on it.

To exercise any of these rights, please contact: info@solvendacapitalsolutions.com.

We may need to verify your identity before processing your request. There is no charge for exercising these rights unless your request is excessive or unfounded.



# California Residents (CCPA):

You have additional rights to know, access, and request deletion of personal information collected within the past 12 months, and to opt out of data sharing for marketing. We do not sell personal information.

### 9. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to enhance functionality and analyze usage. Cookies are small text files placed on your device to help us:

- Remember your preferences.
- Improve website navigation and performance.
- Measure website traffic and user engagement.

You can control or disable cookies through your browser settings. Essential cookies are required for the website to function; disabling them may affect your browsing experience.

For more detailed information, please refer to our **Cookie Policy** (available on our website).

#### 10. Data Protection for Minors

Our website and services are directed toward business professionals and are not intended for use by minors under 18 years of age. We do not knowingly collect data from minors. If you believe a minor has provided us with personal information, please contact us, and we will take appropriate steps to delete such data.

# 11. Changes to This Policy

We may update this Privacy Policy from time to time to reflect legal, technical, or business developments. When we make significant changes, we will update the "Last Updated" date and, where appropriate, notify you by email or website notice.

We encourage you to review this page periodically to stay informed about how we protect your information.



# 12. Contact and Complaints

If you have questions, concerns, or complaints about this Privacy Policy or how we handle your personal data, please contact us at:

Email: info@solvendacapitalsolutions.com

Address: Solvenda Capital Solutions S.à r.l., Luxembourg, Luxembourg

If you are based in the European Union or United Kingdom and are not satisfied with our response, you have the right to lodge a complaint with your local data protection authority.

#### **Supervisory Authority Example:**

Commission Nationale pour la Protection des Données (CNPD), Luxembourg – www.cnpd.lu

# 13. Summary of Our Commitment

At Solvenda Capital Solutions, privacy and data integrity form part of our core business ethics. We handle your information with care, transparency, and respect. By continuing to use our website or services, you acknowledge that you have read and understood this Global Privac y Policy.

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