Privacy Policy

Effective date: June 2020

At AH Capital Management, LLC ("a16z"), we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal information. By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

Remember that your use of a16z’s Services is at all times subject to our Terms of Use, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

If you have a disability, you may access this Privacy Policy in an alternative format by contacting privacy@a16z.com.

What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

Categories of Personal Data We Collect

Below lists the categories of Personal Data that we collect and have collected over the past 12 months:

- Contact Information (e.g. first and last name, email address)
- Device/IP data (e.g. IP address)
- Usage Analytics (e.g. interactions with our web properties and newsletters)
- Demographic Data (e.g. race, gender, veteran status)
- Geolocation Data (e.g. IP-address-based location information)
- Other Identifying information that You Voluntarily Provide (e.g. identifying information in emails or letters you send us)

Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- You
  - When you provide such information directly to us.
When Personal Data about you is automatically collected in connection with your use of our Services (see the subsection titled “Information Collected Automatically” below).

**Third Parties**
- **Vendors**: For example, we may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
- **Advertising Partners**: We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, advertisements or communications.

**Information Collected Automatically**

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser and tell us how and when you visit and use our Services, to analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data—usually text files—placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies**. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies**. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies**. Performance/Analytical Cookies allow us to understand how visitors use our Services such as by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. In addition to our own Performance/Analytical Cookies, the Services may contain Performance/Analytical Cookies from third party analytics services. You can learn more about these third parties in the “Personal Data Sales Opt-Out and Opt-In” section below.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.
To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit http://www.allaboutcookies.org/.

**How We Use Your Personal Data**

We process Personal Data to operate, improve, understand and personalize our Services. We collect and use Personal Data for the following purposes:

- To meet or fulfill the reason you provided the information to us.
- To communicate with you about the Services, including Service announcements, updates or offers.
- To provide support and assistance for the Services.
- To create and manage your account or other user profiles.
- To personalize website content and communications based on your preferences.
- To deliver our newsletters, emails and facilitate events.
- To facilitate career counseling services.
- To manage visitors to our offices and protect our proprietary information and intellectual property.
- To respond to user inquiries and fulfill user requests.
- To improve and develop the Services, including testing, research, analysis and product development.
- To protect against or deter fraudulent, illegal or harmful actions and maintain the safety, security and integrity of our Services.
- To comply with our legal or contractual obligations, resolve disputes, and enforce our Terms of Use.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For any other business purpose stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

As noted in the list above, we may communicate with you if you’ve provided us the means to do so. For example, if you’ve given us your email address, we may send you promotional email offers or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us, which helps us improve our Services. If you do not want to receive communications from us, please indicate your preference by emailing us at privacy@a16z.com.

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

**How We Share Your Personal Data**
Categories of Third Parties with Whom We Share Personal Data

We disclose your Personal Data as indicated above to the following categories of service providers and other parties:

- **Service Providers**
  - **Categories of Personal Data Shared:** We disclose Contact Information, Usage Analytics and Demographic Data to our Service Providers.
  - **Purposes for Sharing:** These third party service providers help us provide our services and operate our business, including ad networks, analytics providers, security and fraud prevention providers, hosting and other technology and communications providers, and staff augmentation and contract personnel. We also use third party service providers to help us manage newsletter signups and email services and for event registration. When we share your Personal Data with Service Providers, they may only use your Personal Data for specific purposes relating to assisting us with running our business.

- **Successors to Our Business**
  - **Categories of Personal Data Shared:** All Personal Data.
  - **Purposes for Sharing:** Your Personal Data may also be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. For example, the Services use industry standard Secure Sockets Layer (SSL) technology to allow for the encryption of Personal Data you provide to us. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the Internet or storing data is completely secure. We cannot guarantee the complete security of any data you share with us, and except as expressly required by law, we are not responsible for the theft, destruction, loss or inadvertent disclosure of your information or content.

We retain Personal Data about you for as long as we have a business purpose to do so. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

We do not knowingly collect or solicit Personal Data about children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will
delete that information as quickly as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, please contact us at privacy@a16z.com.

**California Resident Rights**

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@a16z.com.

**Access**

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient.

If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

**Deletion**

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

**Exercising Your Rights**

To exercise the rights described above, you must send us a request that (1) provides sufficient information to allow us to verify that you are either the person about whom we have collected Personal Data or are an agent authorized by that person, including without limitation your name and email address, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.
We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Email us at: privacy@a16z.com
- Submit a form at this address: https://info.a16z.com/ccpa-inquiry.html

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

**Personal Data Sales Opt-Out and Opt-In**

In this section, we use the term ‘sell’ as it is defined in the CCPA. Over the past 12 months, we have not sold any Personal Data to third parties. We also do not sell the Personal Data of minors under 16 years of age.

**We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA**

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

**Other State Law Privacy Rights**

**California Resident Rights**

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at privacy@a16z.com.

**Nevada Resident Rights**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at privacy@a16z.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

**Changes to this Privacy Policy**

We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the a16z.com website, by sending
you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

**Contact Information:**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- privacy@a16z.com