PRIVACY POLICY

This Privacy Policy ("Privacy Policy") explains how The Investor Ladder Limited, trading as ClimbGroup ("Climb Group", “ClimbGroup”, "Climb UK", "ClimbUK", "Climb Dubai", "ClimbDubai", "Investor Ladder", "we", "us", or "our"), collects, uses, stores, shares, transfers, and protects personal data in connection with our websites, applications, digital platforms, events, competitions, memberships, communications, products, and services.

This Privacy Policy applies whenever you access or use any ClimbGroup website, affiliated domain, mobile application, event platform, customer portal, communication channel, or other service operated by us, or otherwise interact with ClimbGroup. It also applies where you register for events, participate in competitions or surveys, submit enquiries, communicate with us, subscribe to our services, or provide personal information to us in any other way.

We are committed to protecting your privacy and ensuring that personal data is processed lawfully, fairly, and transparently in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and other applicable data protection legislation.

By accessing or using our services, attending our events, participating in our competitions, communicating with us, or otherwise providing information to us, you acknowledge that your personal data may be processed in accordance with this Privacy Policy.

Who We Are

ClimbGroup is one of the UK’s largest networks of equity investors, including individual angels, venture capital firms, early-stage private equity, and investment banks. Through regular events, meetings, and roundtables, we facilitate introductions and discussions across industry, innovation, and investment.

Operational material – Controlled Distribution

Data Collection

We collect personal data directly from you when you use our services, register for events, create an account, purchase products or services, participate in competitions, complete surveys, communicate with us, engage with our communities, or otherwise interact with ClimbGroup.

We may also receive personal data indirectly from organisers, employers, colleagues, exhibitors, sponsors, event partners, referral partners, publicly available sources, integrated systems, or third parties acting on your behalf.

The categories of personal data collected and the purposes for which it is processed are described throughout this Privacy Policy, including within the "How We Use Your Personal Data" section.

Accounts and User Portals

Where you register for events, purchase products or services, submit applications, participate in programmes, or otherwise engage with ClimbGroup, we may create an account or portal profile for you. This may occur automatically, including where an initial purchase or registration was completed as a guest.

These accounts allow users to access tickets, bookings, invoices, communications, preferences, networking services, event information, and other related functionality.

We use account information to provide services, maintain security, prevent unauthorised access, administer our platforms, and support customer service activities.

How We Use Your Personal Data

Activity	Personal Data Used	Purpose	Lawful Basis
Account creation and management	Name, email address, company details, login information	To create and manage your account, provide access to services, and maintain account security.	Contract, Legitimate Interests
Event registration and attendance	Contact details, company information, event preferences, attendance records	To administer events, provide tickets, facilitate participation, and support event operations.	Contract, Legitimate Interests
Networking and introductions	Name, company, job title, biography, networking preferences	To facilitate introductions, networking opportunities, and professional connections.	Legitimate Interests, Consent where applicable
Customer support and helpdesk services	Communications, support requests, account information, correspondence records	To provide support, resolve issues, and improve customer service.	Contract, Legitimate Interests
AI-assisted processing	Information contained within enquiries, communications, support requests, registrations, and account records	To assist staff with administration, support, reporting, analytics, and operational activities.	Legitimate Interests, Contract
Communications and notifications	Email address, telephone number, messaging identifiers	To send service updates, event information, reminders, and	Contract, Legitimate Interests

		operational communications.	
Marketing and newsletters	Contact details, communication preferences, engagement data	To promote services, events, and opportunities where permitted by law.	Consent, Legitimate Interests
Website analytics and performance monitoring	IP address, device information, browser information, usage data, cookie identifiers	To understand website usage, improve performance, troubleshoot issues, and measure effectiveness.	Consent, Legitimate Interests
Affiliate and referral programmes	Referral identifiers, tracking information, transaction records	To administer affiliate programmes, attribute referrals, and calculate commissions.	Contract, Legitimate Interests
Competitions, awards, grants, and promotional campaigns	Application information, eligibility information, contact details	To administer competitions and provide related benefits.	Contract, Consent, Legitimate Interests
Recruitment and event staffing	Contact details, availability information, experience details	To recruit and manage temporary staff, contractors, and event personnel.	Contract, Legitimate Interests
Security, fraud prevention, and compliance	Technical information, account activity, communication records	To protect services, investigate incidents, prevent misuse, and meet legal obligations.	Legal Obligation, Legitimate Interests

The lawful basis relied upon may vary depending on the specific services used and the relationship between you and ClimbGroup. Where we rely on Legitimate Interests, we have considered the impact on your rights and freedoms and believe the processing is necessary, proportionate, and consistent with your reasonable expectations.

Further information about specific processing activities, retention periods, recipients, and third-party service providers may be provided at the point of data collection or upon request.

Analytics, Tracking and Similar Technologies

In addition to cookies, ClimbGroup uses analytics, monitoring, attribution, and diagnostic technologies to understand how our websites, applications, platforms, events, and services are used and to improve their performance, functionality, security, and effectiveness.

These technologies may include:

- Website and application analytics;
- Marketing and advertising attribution tools;
- Conversion tracking technologies;
- Session replay and user interaction analysis tools;
- Heatmaps and engagement measurement tools;
- Error logging and performance monitoring systems;
- Referral, affiliate, and campaign attribution systems;
- UTM parameter tracking and link tracking technologies;
- Event and platform usage analytics.

These technologies may operate across our websites, mobile applications, client portals, event platforms, communications, digital services, and other systems operated by or on behalf of ClimbGroup.

Depending on the services being used, these technologies may collect information such as device information, browser information, IP address, approximate location information, pages viewed, links clicked, time spent on pages, session information, referral information, campaign attribution data, and interactions with our websites, applications, emails, advertisements, events, and services.

Where required by law, non-essential analytics, advertising, behavioural analysis, affiliate attribution, session replay, heatmap, and marketing tracking technologies will only operate after you have provided the appropriate consent through our cookie and tracking preference controls.

We implement reasonable measures designed to minimise the collection of unnecessary information through these technologies and may apply masking, filtering, anonymisation, pseudonymisation, exclusion rules, or other controls where appropriate.

You may manage your preferences at any time through the Cookie Preferences controls available on our websites.

Cookie Preferences

Our websites use cookies and similar technologies to improve functionality, measure performance, remember preferences, support security, and enhance user experience.

Non-essential cookies and similar tracking technologies are only deployed where you have provided the appropriate consent. You may withdraw or amend your consent at any time using the Cookie Preferences controls available on our websites.

We periodically request confirmation of your cookie preferences to ensure your choices remain accurate and up to date. As part of this process, we may re-display cookie preference prompts from time to time.

Our cookie and consent management processes are designed to comply with applicable UK and European privacy and electronic communications legislation, including guidance issued by the Information Commissioner's Office (ICO) and the Privacy and Electronic Communications Regulations (PECR). Where required by law,

non-essential cookies, analytics technologies, behavioural monitoring, affiliate attribution technologies, advertising tracking, session replay tools, and similar technologies will only operate after the appropriate consent has been obtained.

Further information regarding analytics, tracking technologies, behavioural analysis, attribution systems, session replay technologies, and related processing can be found in the "Analytics, Tracking and Similar Technologies" section of this Privacy Policy.

Artificial Intelligence and Automated Processing

ClimbGroup uses Artificial Intelligence ("AI"), machine learning technologies, automation tools, and AI-assisted software to support customer service, administration, communications, event management, marketing, analytics, reporting, security, and other operational activities.

These technologies may process personal data contained within information you provide to us, including correspondence, enquiries, registrations, support requests, account information, event participation records, survey responses, website interactions, communications, and other information collected through our services.

AI-assisted technologies may be used to:

- Categorise, prioritise, route, summarise, and analyse enquiries, support requests, and communications;
- Assist with customer support, helpdesk operations, live chat, email handling, and response generation;
- Support event management, administration, networking activities, attendee services, and operational planning;
- Produce summaries, reports, insights, analytics, and business intelligence;
- Search, retrieve, analyse, and process information contained within systems authorised for use by ClimbGroup;
- Assist staff with administrative and operational tasks;

- Monitor, troubleshoot, secure, and improve our services.

Where appropriate, AI systems may interact with authorised business systems, databases, platforms, applications, storage services, communication systems, and business tools through controlled authentication, permissions, integrations, APIs, automation frameworks, or similar technologies.

AI systems used by ClimbGroup are intended to assist our staff and operational processes. Human review, oversight, intervention, or approval may be applied where appropriate depending on the nature of the activity, service, request, decision, or outcome. We do not use solely automated decision-making processes that produce legal or similarly significant effects on individuals unless otherwise permitted by law and disclosed separately where required.

We take reasonable steps to ensure that AI providers and technology suppliers implement appropriate technical and organisational safeguards to protect personal data. Where technically and contractually available, we configure providers not to use ClimbGroup customer data for AI model training, model improvement, or similar purposes and require such providers to process personal data only for authorised purposes.

Some AI-assisted services are provided by third-party technology providers. Depending on the provider and services being used, personal data may be processed, stored, transferred, accessed, analysed, or backed up within the United Kingdom, the European Economic Area, and other jurisdictions in accordance with the safeguards described within this Privacy Policy.

We ask that individuals do not provide special category personal data (such as information relating to health, ethnicity, religious beliefs, sexual orientation, trade union membership, genetic data, biometric data, or criminal convictions) through AI-assisted communication channels unless such information is necessary for us to provide a requested service, fulfil a legal obligation, protect safety, or comply with applicable law.

If you do not wish your information to be processed using AI systems operated by or on behalf of ClimbGroup, please contact our Data Protection Officer at dataprotection@climb-group.com to discuss whether alternative communication methods may be available. Please note that communications may still pass through technology platforms operated by third-party service providers, which may utilise their own automated security, filtering, routing, monitoring, or processing technologies that are outside the direct control of ClimbGroup.

Event Participation, Networking and Media

ClimbGroup operates a range of physical events, virtual events, webinars, live streams, networking platforms, websites, applications, communities, competitions, social channels, and other engagement activities. References to "events" within this Privacy Policy should be interpreted broadly and are not limited to in-person attendance.

By attending, participating in, registering for, speaking at, exhibiting at, sponsoring, contributing to, or otherwise engaging with a ClimbGroup event, platform, service, or community activity, you acknowledge that certain personal information may be shared with other attendees, participants, exhibitors, sponsors, partners, or stakeholders where necessary to facilitate networking, introductions, event delivery, attendee services, business engagement, sponsorship fulfilment, lead generation activities, or related services.

Depending on the nature of the activity, this may include your name, company affiliation, job title, professional biography, profile information, contact details, networking preferences, and other information that you choose to provide through registration forms, applications, attendee directories, event platforms, mobile applications, meeting booking systems, websites, community platforms, or other services.

ClimbGroup activities may be photographed, filmed, live streamed, recorded, screen captured, or otherwise documented. By participating in these activities, you acknowledge that your image, likeness, voice, comments, contributions, profile

information, presentations, messages, or participation may be captured and used in photographs, video recordings, audio recordings, event reports, promotional materials, social media content, editorial content, live streams, recordings, and other marketing, communications, editorial, reporting, promotional, archival, educational, or commercial materials produced by or on behalf of ClimbGroup.

Media may be captured by ClimbGroup, its partners, sponsors, exhibitors, media organisations, journalists, content creators, attendees, and other third parties. ClimbGroup may receive, acquire, licence, commission, or otherwise obtain copies of such content for promotional, editorial, reporting, archival, or commercial purposes. Where content is captured by or on behalf of ClimbGroup, or where rights are granted to ClimbGroup, such content may be processed in accordance with this Privacy Policy and our Terms of Service.

ClimbGroup cannot control, modify, remove, or otherwise take responsibility for content independently captured, published, distributed, or shared by third parties who are not acting on behalf of ClimbGroup.

Large events may involve general audience photography, videography, or recordings where obtaining individual consent from every attendee may not be practical. Where an individual is intended to be the primary focus of a photograph, recording, interview, testimonial, case study, promotional feature, media appearance, or similar content, ClimbGroup, its authorised partners, sponsors, exhibitors, media representatives, photographers, videographers, and other authorised content creators will seek permission where required and appropriate.

Permission may be obtained verbally, electronically, in writing, through recorded participation, or through another appropriate method. Where permission is provided, ClimbGroup may retain records of that permission for evidential and administrative purposes.

Individuals may withdraw permission for future use of such content by contacting the relevant event team, marketing@climb-uk.com for ClimbUK events, or queries@climb-group.com for other ClimbGroup activities. Withdrawal will apply to future use of the content where reasonably practicable. However, it may not be possible to remove or retract content that has already been published, distributed, licensed, broadcast, archived, shared with partners, reproduced by third parties, included within historical event materials, or otherwise entered the public domain.

ClimbGroup primarily provides services to businesses, professionals, entrepreneurs, investors, event participants, and organisational representatives. We do not knowingly collect personal data from children in connection with services specifically directed towards children.

Competitions, Prize Draws and Promotional Campaigns

From time-to-time ClimbGroup may operate competitions, prize draws, awards programmes, grants, sponsorship initiatives, or similar promotional activities.

Where you choose to participate in such activities, we may share relevant personal data with competition sponsors, judges, delivery partners, funding partners, or organisations directly involved in administering the competition.

Data shared will be limited to information reasonably required for the operation, assessment, delivery, administration, or fulfilment of the competition or associated benefits. This may include the sharing of application materials, supporting information, contact details, eligibility information and other information reasonably required to administer the competition or deliver associated benefits.

Additional competition-specific terms and conditions may apply and will take precedence where there is any conflict with this Privacy Policy.

Any such sharing will be carried out in accordance with UK GDPR and other applicable data protection legislation.

Data Sharing

We do not sell personal data to third parties under any circumstances.

We may share personal data with event partners during and shortly after events where relevant to your participation and the delivery of event-related services.

We may share personal data with member organisations, sponsors, exhibitors, competition partners, service providers, or other third parties where necessary to provide services, facilitate networking, administer events, fulfil contractual obligations, comply with legal obligations, or where you have requested or consented to such sharing.

We may share personal data with technology providers, cloud service providers, communication platforms, analytics providers, payment processors, artificial intelligence providers, event technology providers, and other service providers acting as data processors on our behalf. These providers assist us in delivering our services and may process personal data solely for authorised purposes and subject to appropriate contractual, confidentiality, security, and data protection obligations.

We may also share anonymised, aggregated, statistical, or non-identifiable information for research, reporting, analytics, marketing, operational, or business purposes.

All data sharing is carried out under appropriate lawful bases and with safeguards designed to protect personal data.

Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, to provide services, comply with legal obligations, resolve disputes, enforce agreements, maintain security, and protect our legitimate business interests.

Retention periods will vary depending on the nature of the information, the services used, legal requirements, operational requirements, and the relationship between the individual and ClimbGroup.

The following provides a summary of our typical retention practices:

Data Category	Typical Retention Period
Membership, customer, account, and client records	Up to 7 years after the relationship ends
Event registrations, bookings, attendance records, tickets, orders, and invoices	Up to 7 years
Initial enquiries and prospective customer information	Up to 2 years after the last meaningful interaction
Correspondence, support requests, helpdesk records, SMS messages, WhatsApp messages, and communication history	Up to 2 years after the last meaningful interaction
Marketing preferences, suppression lists, unsubscribe records, and opt-out records	Retained for as long as necessary to honour communication preferences and prevent unwanted communications
Competition, award, grant, and promotional campaign records	Up to 3 years after completion of the activity unless a longer period is required
Networking, introductions, attendee directory information, badge scans, meeting requests, and event engagement records	Up to 7 years

Website analytics, tracking, attribution, session replay, heatmaps, diagnostic information, and behavioural analytics	Typically between 30 days and 26 months depending on the service and configuration
Affiliate, referral, attribution, campaign tracking information, and UTM tracking records	Retained for as long as necessary to administer the programme, calculate commissions, validate referrals, and resolve disputes
Security logs, access logs, audit logs, fraud prevention records, monitoring information, and error logs	Typically between 90 days and 7 years depending on the purpose and legal requirements
Event photography, recordings, livestreams, promotional content, testimonials, interviews, media assets, and historical event archives	Retained for as long as ClimbGroup reasonably considers the content to remain valuable for business, promotional, historical, archival, legal, educational, reporting, or operational purposes.
Recruitment, staffing, contractor, volunteer, and event personnel information	Up to 2 years after the recruitment or engagement process concludes unless a longer period is required
AI interaction records, AI-generated summaries, AI-assisted support records, operational reports, analytics outputs, and associated audit information	Retained in accordance with the underlying system, service, communication, or record to which they relate
Financial records, accounting information, tax records, payment information, refunds, invoices, and transaction records	Up to 7 years or longer where required by law

Forum posts, community content, comments, user-generated content, and platform contributions	Retained until deleted by the user, removed by ClimbGroup, or no longer required for operational purposes

Where multiple retention periods apply, we will retain information for the longer applicable period. In certain circumstances we may retain information for longer where required by law, necessary to establish, exercise or defend legal claims, required for regulatory purposes, necessary to prevent fraud or abuse, or otherwise permitted by applicable law.

Where personal data is no longer required, we will delete, anonymise, aggregate, suppress, archive, or otherwise securely dispose of the information in accordance with our retention practices.

Data Security

ClimbGroup operates primarily within the United Kingdom and the European Economic Area.

In order to provide our services, we use a range of technology providers, communications platforms, cloud services, payment providers, analytics platforms, event systems, and other third-party service providers. Depending on the provider, configuration, and services being used, personal data may be stored, processed, accessed, transferred, or backed up in countries outside the United Kingdom or European Economic Area.

Where personal data is transferred internationally, ClimbGroup will take reasonable steps to ensure that appropriate safeguards are in place in accordance with applicable data protection legislation. These safeguards may include adequacy regulations, International Data Transfer Agreements (IDTAs), the UK Addendum to

the European Commission's Standard Contractual Clauses, contractual protections, or other lawful transfer mechanisms recognised under applicable law.

ClimbGroup is committed to protecting personal data and implementing appropriate technical, organisational, physical, and administrative measures designed to safeguard information against unauthorised access, disclosure, alteration, loss, misuse, or destruction.

Access to personal data is restricted to authorised personnel and approved service providers who require access in order to fulfil their duties.

We use a range of security measures which may include access controls, authentication mechanisms, multi-factor authentication, encryption, monitoring and audit logging, backup and recovery procedures, incident response processes, staff training, device management controls, security reviews, vulnerability management, and supplier due diligence processes.

Whilst we take reasonable steps to protect personal data, no method of transmission over the internet, electronic storage system, communication service, or security control can be guaranteed to be completely secure. We therefore cannot guarantee the absolute security of personal data, although we continually work to maintain and improve appropriate safeguards.

External Links

Our website may contain links to external websites. Please be aware that we do not control these sites and cannot be responsible for the protection and privacy of any information you provide while visiting them. We encourage you to review the privacy policies of any external sites you visit.

Your Rights

Subject to applicable data protection laws, you have the following rights in relation to your personal data:

- The right to be informed about how your personal data is collected, used, shared, stored, and protected;
- The right to access the personal data we hold about you and obtain a copy of that information;
- The right to request that inaccurate, incomplete, or outdated personal data is corrected or updated;
- The right to request the erasure of your personal data in certain circumstances;
- The right to request that we restrict the processing of your personal data in certain circumstances;
- The right to receive certain personal data in a structured, commonly used, and machine-readable format and, where technically feasible, to request that it be transferred to another organisation;
- The right to object to processing that we carry out on the basis of our Legitimate Interests;
- The absolute right to object at any time to the processing of your personal data for direct marketing purposes;
- The right to withdraw consent at any time where we rely upon your consent as the lawful basis for processing. Withdrawal of consent will not affect the lawfulness of processing carried out before that consent was withdrawn;
- The right not to be subject to solely automated decision-making or profiling that produces legal or similarly significant effects, except where permitted by applicable law.

To exercise any of these rights, please contact our Data Protection Officer at dataprotection@climb-group.com.

We will normally respond to requests within one calendar month. Where permitted by law, this period may be extended where requests are particularly complex or numerous.

If you request the deletion of personal data that is required for us to provide a service, maintain an account, fulfil a contract, comply with legal obligations, exercise legal rights, prevent fraud, maintain security, or protect legitimate business interests, we may be unable to continue providing some or all services to you. Certain information may also continue to be retained where we are required or permitted to do so by law.

Where we rely on Legitimate Interests as the lawful basis for processing, you have the right to object to that processing. We will carefully consider all objections and will cease processing unless we have compelling legitimate grounds to continue, another lawful basis applies, or the processing is necessary for the establishment, exercise, or defence of legal claims.

If you are dissatisfied with how we handle your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) or seek an appropriate legal remedy.

Marketing Preferences

Where permitted by law, ClimbGroup may send you information relating to events, services, opportunities, surveys, newsletters, and other activities that may be relevant to you.

You may manage your communication preferences at any time by:

- Using the unsubscribe link included within marketing communications;
- Updating your preferences through your account dashboard;
- Contacting us through live chat;
- Emailing queries@climb-group.com.

We will continue to maintain suppression records where necessary to ensure that individuals who opt out do not receive future marketing communications.

Certain service-related communications may still be sent where necessary to provide a service you have requested, fulfil a contractual obligation, or comply with legal requirements.

Policy Updates

ClimbGroup reserves the right to amend, update, or otherwise modify this Privacy Policy at any time. Where such changes are made, ClimbGroup will publish the revised Privacy Policy on its website and may, at its discretion, notify users by email or other appropriate means.

Continued use of ClimbGroup services following the publication of an updated Privacy Policy constitutes acknowledgement of the revised policy. Users are encouraged to review this Privacy Policy periodically to remain informed about how their personal information is collected, used, shared, and protected.

For transparency, previous versions of this Privacy Policy may be made available alongside the current version together with a summary of material changes.

Version	Effective Date	Summary of Changes
3.0	July 2026	Comprehensive modernisation of the Privacy Policy. Enhanced transparency regarding how personal data is collected, used, shared, retained, and protected. Expanded information relating to events, networking, media, analytics, tracking technologies, artificial intelligence, user accounts, competitions, international transfers, security measures, individual rights, retention practices, and communication preferences. Introduced additional transparency and version history information.
2.0	November 2025	Significant revision of the Privacy Policy. Improved structure, refreshed branding, expanded event and membership-related provisions, enhanced data sharing and retention information, introduced dedicated sections covering cookies, security, marketing preferences, and policy updates, and brought the policy into closer alignment with evolving business operations.
1.0	Feb 2023	Initial publication of the ClimbUK Privacy Policy, building upon previous privacy and data protection practices operated through The Investor Ladder Limited and associated event brands.