Privacy Policy

Entrepreneurship Sports Generation

PRIVACY POLICY

Effective Date: October 1, 2020
Last Updated: October 1, 2020

INTRODUCTION

NestGSV Inc. (dba GSVlabs) and The Global Education & Leadership Foundation (TGELF) and their subsidiaries and affiliates (collectively, "GSVlabs and TGELF", "us", "we" or "our") created this privacy policy ("Privacy Policy") to advise you about GSVlabs' and TGELF's information practices, such as the types of information we collect and how we may use that information, and to inform you about your privacy rights and how the law protects you. We urge you to read this Privacy Policy carefully. Please also review our Terms of Use, which govern your use of the Sites (as defined below).

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below.

Individuals in the European Union ("EU") should be sure to read the important information provided in section XIII below, in addition to the other provisions in this Privacy Policy.

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I. IMPORTANT INFORMATION AND WHO WE ARE

A. APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy applies to https://esgx.global and all other websites, features, or online services that are owned or controlled by NestGSV Inc. and the TGELF Foundation and that post a link to this Privacy Policy (collectively, the “Sites”), whether accessed via computer, mobile device, or otherwise. For convenience, we refer to the Sites and our services collectively as the “Service”. Note, however, this Privacy Policy does not apply to your use of unaffiliated websites that link to our Sites. Once you enter another website (whether through an advertisement, service, or content link), be aware that we are not responsible for the privacy practices of such other websites.

B. PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how NestGSV Inc. and the tGELF collect and use your Personal Information through your use of the Service, including any information you may provide through the Service when you sign up to receive communications, purchase a product or service, or request further services or information from us.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or using Personal Information about you so that you are fully aware of how and why we are using your information. This Privacy Policy supplements the other notices and is not intended to override them.

C. CHILDREN

The Service is not intended for children and we do not knowingly collect information relating to children. If NestGSV Inc. and/or the TGELF Foundation discovers that it has inadvertently collected Personal Information from anyone younger than the age of 16, it will delete that information.

D. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 02/10/20.

We reserve the right, at any time and without notice, to add to, change, update or modify this Privacy Policy, simply by posting such change, update or modification on the Sites. Any such change, update or modification will be effective immediately upon posting on the Sites. However, unless you consent, NestGSV Inc. and the TGELF Foundation will not use your Personal Information in a manner materially different than what was stated in our posted Privacy Policy at the time your Personal Information was collected. Please check this Privacy Policy regularly to ensure you are aware of any changes in our practices. If we make material changes to this Privacy Policy, we will notify you by email or through the Sites.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. If you contact us with changes, we will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable. Note, however, that information may persist internally for our administrative purposes and that residual data may remain on backup media or for other reasons.

E. THIRD PARTY CONTENT, LINKS TO OTHER WEBSITES, AND NESTGSV INC. AND TGELF FOUNDATION CONTENT FOUND OUTSIDE THE SITES

The Sites may include links to third-party websites, embedded content, plug-ins and applications and certain content on the Sites may be hosted and served by third parties that NestGSV Inc. and the TGELF Foundation does not control. Clicking on those links, viewing or accessing embedded content (such as videos, gifs, or audio files), or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Sites, we encourage you to read the privacy policy of every website you visit.

In addition, NestGSV Inc. and the TGELF Foundation content may be included on web pages and websites that are not associated with NestGSV Inc. or the TGELF Foundation and over which we have no control. These third parties may collect data through the use of their own cookies, web beacons or other technology, independently collect information or solicit Personal Information, and may have the ability to track your use of their websites and services. NestGSV Inc. and the TGELF Foundation are not responsible for the privacy practices or the content of any third party.

II. THE INFORMATION WE COLLECT ABOUT YOU

Personal Information or personal data means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (“Anonymous Data”).

We and our third-party service providers may collect, use, store and transfer different kinds of Personal Information about you that we have grouped together follows:

- Identity Information includes name, username or similar identifier, company name, title, date of birth, and gender.Demographic Information includes zip code, age and/or income.Contact Information includes billing address, mailing address, email address and telephone numbers. Financial Information includes bank account and payment card details.Transaction Information includes details about payments to and from you and other details of products and services you have purchased from us. Technical Information includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology or other unique identifier (a set of numbers or characters that is assigned to your computer, mobile phone, or other device when you are on the Internet) (“Device Identifier”) for any computer, mobile phone, tablet or other device (any of which are referred to herein as a “Device”) used to access the Sites. Profile Information includes your username and password, purchases or orders made by you, your interests, preferences, and feedback. Usage Data includes information about how you use our Service, products and services, including all of the areas

within our Sites that you visit or use, and the time of day you visited the Sites, among other information. Marketing and Communications Information includes your preferences in receiving marketing from us and our third parties and your communication preferences. Location Information includes information about your location using a variety of technologies, such as GPS, IP address, and connected or nearby Wi-Fi networks. User Content Information includes text (including questions, comments, and suggestions), pictures, audio, videos, or other content (collectively, "User Content") you share by participating and posting content publicly in reviews, interactive features, or other communication functionality (“Community Features”). Business Information includes text, images, or video pertaining to your company or project that you share by participating and completing the competition application.

We also collect, use and share Aggregated Information such as statistical or demographic information for any purpose. Aggregated Information may be derived from your Personal Information but is not considered Personal Information in law as this information does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Information with your Personal Information so that it can directly or indirectly identify you, we treat the combined information as Personal Information that will be used in accordance with this Privacy Policy.

We do not intentionally collect any Special Categories of Personal Information about you (this includes Social Security numbers, details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

III. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect information from and about you, including through:

- Direct interactions. You may give us your Identity, Demographic, Contact, Financial, Transaction, Profile, or Marketing and Communications Information by filling in forms or by corresponding with us by mail, phone, email, or otherwise. This includes Personal Information you provide when you:purchase and use our products or services; create an account on our Sites; subscribe to our services or publications; correspond with other users on the Sites; request marketing to be sent to you; or correspond with us or give us feedback.

- Automated technologies or interactions. As you interact with our Sites, our servers and third party service providers may automatically collect Technical, Usage, and Location Information about your equipment, Device, browsing actions and patterns. We collect this Personal Information by using cookies, web beacons, embedded scripts and other similar technologies. We may also receive Technical Information about you if you visit other websites employing our cookies. Please see the information about our use of cookies for further details.Cookies - Cookies are data files sent to and stored on the Device you use to view a website. Cookies can be used for many purposes, including to monitor use of our Sites, to customize content specific to your interests, to ensure that you do not see the same advertisement repeatedly and to store your user name and password so you do not have to re-enter it each time you visit the Sites. If you choose to disable cookies on your Device, some features of the Sites or our content may not function properly. For more information on our use of cookies, please see Section VI.C.Web Beacons - Web Beacons are small graphic images or other web programming code (also known as "1x1 GIFs" or "clear GIFs") that may be included on the Sites and in our e-mail messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a web page or e-mail can act as a web beacon. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Sites, to monitor how users navigate the Sites, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.Embedded Scripts - Embedded scripts are programming code designed to collect information about your interactions with the Sites, such as the links you click. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the Sites.

- Community Features. The Service may provide you the opportunity to participate and post User Content publicly through reviews, surveys, interactive features, or other communication functionality (“Community Features”). We may provide functionality for you to submit or post User Content through Community Features, by linking the Sites to a third party service, or otherwise. Please note that certain information, such as your name, may be publicly displayed on the Sites along with your User Content. User Content consisting of uploaded files may contain metadata, which may contain Personal Information or other information about or relating to you. You may wish to remove metadata from your files before transmitting such files to NestGSV Inc. and the TGELF Foundation. Note that anything you post through Community Features is public – others will have access to your User Content and may use it or share it with third parties. If you choose to voluntarily disclose Personal Information, that information will be considered public information and the protections of this Privacy Policy will not apply. If you submit User Content, it may be published online or offline at any time. In addition, we may use your User Content and any excerpt from your User Content in connection with our advertising, marketing, publicity and promotional activities.
- Third parties or publicly available sources. We may receive Personal Information about you from various third parties (including your employer, broker, host, parent or guardian) or public sources. For example, if you are on another website and you opt-in to receive information from us, the other website may forward your contact and other information to us so that we may contact you as requested. If your company has provided you with access to the Service, we may receive information about you from your company. We also may supplement the information we collect with outside records from third parties in order to provide you with information, services or goods you have requested, to enhance our ability to serve you, and to tailor our content to you. We may combine the information we receive from those other sources with information we collect through the Service. In those cases, we will apply this Privacy Policy to the combined information. Examples of third party sources include:Technical Information from the following parties:analytics providers; advertising networks; and search information.Contact, Financial and Transaction Information from providers of technical, payment and delivery services.Contact and Financial Information from companies that facilitate making reservations.Identity and Contact Information from publicly available sources.

IV. THIRD PARTY INTERACTIONS

Certain functionality on the Sites may permit interactions that you initiate between the Sites and a third party website or service (“Third Party Interactions”). Examples of Third Party Interactions may include technology that enables you to “like” or “share” content from the Sites on or to other websites or services; to transmit content to the Service from your account on a third party website or service; and to otherwise connect the Service to a third party website or service, such as through an application programming interface (API) made available by NestGSV Inc., the TGELF Foundation or a third party.

If you choose to use Third Party Interactions, information you post or provide access to may be publicly displayed on the Sites or by the provider of the feature that you use. Similarly, if you post information on a third party platform that references the Service (e.g., by mentioning the Service or using a hashtag associated with the Service in a tweet or status update), your post may be published on our Sites in accordance with the terms of the third party website or service. In addition, both NestGSV Inc., the TGELF Foundation and the third party may have access to certain information about you and your use of the Service and the third party website or service. In addition, we may receive information about you in connection with other users' use of Third Party Interactions (e.g., we may learn that you are a "friend" or "connection" of the third party or receive other information about you that the other user enables us to receive).

The information we collect in connection with Third Party Interactions is subject to this Privacy Policy. The information collected and stored by the third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third party website or service.

V. THIRD PARTY ANALYTICS PROVIDERS & AD SERVERS; ONLINE TRACKING

NestGSV Inc. and the TGELF Foundation work with certain third parties (including network advertisers, ad agencies, and analytics companies) to provide us with information regarding traffic on the Sites, to serve advertisements, including our advertisements elsewhere online, and to provide us with information regarding the use of the Service and the effectiveness of our advertisements. For example, if you clicked on one of our advertisements that led you to one of the Sites, our service provider(s) may be able to tell us which advertisement you clicked on and where you were viewing the advertisement. These third parties may set and access their own tracking technologies (including cookies, embedded scripts, and web beacons) and may otherwise collect or have access to your Device Identifier, Usage Data and related information about you. Cookies and web beacons, including those set by third party network advertisers, may be used to, among other things, target advertisements, prevent you from seeing the same advertisements too many times, conduct research regarding the usefulness of certain advertisements to you, and assist in providing analytics. We may share Device Identifier and Usage Data about visitors with third party advertising companies, analytics providers and other vendors for similar purposes. While we may use a variety of service providers to perform advertising and analytics services, some of these companies may be members of the Network Advertising Initiative ("NAI") or the Digital Advertising Alliance ("DAA") Self-Regulatory Program for Online Behavioral Advertising.

These third parties may also transfer Device Identifier and Usage Data to other third parties where required to do so by law, or where such third parties process analytics information on their behalf. Each of these third party's ability to use and share Device Identifier and Usage Data is restricted by their respective Terms of Use and Privacy Policy. By using our Service, you consent to the processing of data about you by these third parties in the manner and for the purposes set out above. For a full list of third party analytics services, please contact us at community@gsvlabs.com.

For additional information regarding targeted advertising and the "opt-out" procedures of NAI members and DAA Self-Regulatory Program participating companies, you may visit:

- NAI Opt-Out Tool (for website users): http://www.networkadvertising.org/managing/opt_out.asp DAA Consumer Choice (for website users): http://www.aboutads.info/choices/ DAA AppChoices (for mobile app users): http://youradchoices.com/appchoices

Please note that opting out through these mechanisms does not opt you out of being served advertising. You will continue to receive generic ads while visiting the Sites and elsewhere online. Some third parties may collect Personal Information about your online activities over time and across different websites.

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. However, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, the Sites currently do not alter their practices when they receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit http://www.allaboutdnt.com.

VI. HOW WE USE YOUR PERSONAL INFORMATION

We may use the information we collect about you, including Personal Information and Usage Data for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Service. We use your personal information:

- to provide, operate and improve the Service; to identify you as a user in our system; to process a transaction you initiate, process payments and provide accurate billing and shipping; to process your registration with the Sites, including verifying your Contact Information is active and valid; to bill you for NestGSV Inc. and the TGELF Foundation products and services; to contact you with regard to your use of the Sites and, in our discretion, changes to the Sites policies or functionality; to communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages; to communicate with you about events or contests in which you participate; to understand your needs and interests, and personalize your experience with the Service; and to respond to your requests, questions and feedback related to the Service.

For research and development. We analyze use of the Service:

- to customize and tailor your experience with the Service, for example, by displaying content that we think you might be interested in; to study trends and users' movements around the Service; to gather demographic information about our user base; to provide technical support, improved administration of the Service, and develop new products and services; and to present our Service and Sites and their contents in a suitable and effective manner for you and for your device;

To manage events. We use your contact details and other personal information to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you.

To send you marketing and promotional communications. We may send you promotions, newsletters or other marketing communications, information about NestGSV Inc., the TGELF Foundation or our products or services, or promotional material from some of our advertisers or third-party business partners. We may also communicate with you to market our products or services, including recommending products or services that might be of interest to you, but you may opt out of receiving them as described in the Opting Out section below.

To create anonymous data. We may create aggregated and other Anonymous Data from our users' information. We make personal information into anonymous data by removing information that makes the data personally identifiable. We may use this Anonymous Data and share it with third parties to understand and improve the Service, promote our business and for other lawful business purposes. We reserve the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties in our sole discretion.

For compliance, fraud prevention and safety. We may use your personal information and share it with government officials, law enforcement or private parties, as we believe appropriate to:

- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; and where permitted by law in connection with a legal investigation.

With your consent. In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

A. COMMUNICATIONS AND OFFERS FROM US

We may use your Identity, Contact, Technical, Usage, Business and Profile Information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from, purchased goods or services from us, or if you provided us with your details when you registered out our Sites and, in each case, you have opted in to receive that marketing.

B. THIRD-PARTY AND AFFILIATE MARKETING

We do not share your Personal Information with unaffiliated third parties for those unaffiliated third parties' marketing purposes unless you consent to such sharing.

C. COOKIES

A cookie is a data file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiration date, unless deleted by the user before the expiration date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but Personal Information that we store about you may be linked to the information stored in and obtained from cookies.

Based on what function cookies have and the purpose for which cookies are used, there are four categories of cookies: essential cookies, analytics cookies, functional cookies and marketing cookies.

Advertising

These cookies are used by advertising companies to collect information about how you use our Service and other websites over time. These companies use this information to show you ads they believe will be relevant to you within our Service and elsewhere, and to measure how the ads perform.

Facebook

Facebook pixel

Twitter

Google

Linkedin

Analytics

These cookies help us understand how our Service is performing and being used. These cookies may work with clear gifs included in emails we send to track which emails are opened and which links are clicked by recipients.

Google Analytics

Mixpanel

Amplitude

Fullstory

Segment

See ‘your choices’ below.

Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies here and about how Google protects your data here. You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available here.

Essential

These cookies are necessary to allow the technical operation of our Service (e.g., they enable you to move around on a website and to use its features).

Google Tag Manager

AWS

Acuity

Slack

The ULead Platform

Functionality/performance

Enhance the performance and functionality of our Service.

Intercom

Typeform

Zapier

Airtable

Your Choices

Most browsers allow you to refuse all or some browser cookies, or to alert you when websites set or access cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain information about blocking and deleting cookies for some commonly used browsers via the links below:

- Chrome: https://support.google.com/chrome/answer/95647?hl=en
- Edge: https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy
- Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
- Internet Explorer: https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies
- Opera: http://www.opera.com/help/tutorials/security/cookies/
- Safari: https://support.apple.com/kb/PH21411.

Please note that blocking all cookies will have a negative impact upon the usability of many websites and if you choose to block cookies, you may not be able to use all the features on our Sites. For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

VII. DISCLOSURES OF YOUR PERSONAL INFORMATION\

We may share non-personally identifiable information, such as aggregated user statistics, in our discretion and without restriction.

We may disclose the information we have collected about you, including Personal Information, as disclosed at the time you provide your information, with your consent, as described in this Privacy Policy, or in the following circumstances:

A. INTERNAL THIRD PARTIES

NestGSV Inc. and the TGELF Foundation may disclose information including Personal Information with its parent, subsidiaries and affiliates for a variety of purposes, including for business, operational, and marketing purposes. NestGSV Inc. and the TGELF Foundation may, and reserves the right to, share your information with any other company that is not presently, but becomes, a NestGSV Inc. or TGELF Foundation parent, subsidiary, or affiliate.

B. EXTERNAL THIRD PARTIES

Third Party Service Providers

We may share Personal Information with third party service providers in connection with the service providers' performance of services to, or on behalf of, the Sites, including conducting quality assurance testing; to facilitate creation of accounts; to provide technical support; to support the provision of learning resources; and/or to provide other services to NestGSV Inc. or the tGELF. These service providers may store or use your information outside of the EU or United States.

Administrative & Legal Reasons

We may transfer and disclose information, including Personal Information, to third parties:

- to comply with a valid legal inquiry or process such as a search warrant, subpoena, statute or court order, or if in our opinion such disclosure is required by law;
- to obtain or maintain insurance coverage, manage risks, obtain professional advice, or establish, exercise or defend legal claims, whether in court proceedings or in an administrative or out-of-court procedure;
- to protect the safety, interests, rights, property or security of NestGSV Inc., the TGELF Foundation, you, or any third party;
- to respond to a breach or attempted breach of the security of our Sites;
- to defend or assert our legal rights pursuant to any of the Sites' Terms of Use, any policies applicable to the Sites, or any other agreement you may have with NestGSV Inc or the TGELF Foundation.; or
- at the request of governmental authorities conducting an investigation.

We may also use Technical Information to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers, or law enforcement agencies in our discretion.

Community Features

As set forth in Section III, our Sites and services enable you to post User Content through Community Features. If you choose to use these features, you will be identified by your Slack username. Please note that any Personal Information you include on a public area of the Sites will be publicly viewable. Once displayed publicly, that information can be collected and used by others. We cannot control who reads your postings or what other users may do with the information that you voluntarily post, so it is very important that you do not put data such as private contact information that you do not want to make available to the public in your posts. Once you have posted information publicly, while you will still be able to edit and delete it on the Sites, you will not be able to edit or delete such information cached, collected, and stored elsewhere by others (e.g., search engines).

Member connections

At your request, we will share information about you and your affiliated company with Mentors, Investors, and Members on the ESG Platform or GSV Passport. This allows us to make appropriate introductions on behalf of the user to Mentors, Investors, and other Members of the ESG Platform or GSV Passport.

C. SHARING BETWEEN NESTGSV INC. AND tGELF COMPANIES; BUSINESS TRANSFERS

NestGSV Inc. and the TGELF Foundation may also disclose and transfer your Personal Information: (i) to a subsequent owner, co-owner or operator of the Sites or applicable database, or of our products or services; (ii) if NestGSV Inc. or the TGELF Foundation (or any of their affiliated, parent, or subsidiary companies) assigns its rights regarding any of your information to a third party; or (iii) in connection with a corporate merger, consolidation, restructuring, the sale of certain of NestGSV Inc.'s ownership interests, assets, or both, or other company change, including, without limitation, during the course of any due diligence process. These transfers and disclosures may be carried out without notice to you.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to use your Personal Information for specified purposes and in accordance with our instructions.

VIII. YOUR CHOICES

A. ACCESSING, UPDATING, CORRECTING OR DELETING INFORMATION

You can review, request access to, update, correct or delete your Personal Information by contacting us at community@gsvlabs.com.

You may request deletion of your Personal information by contacting us and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain information for fraud prevention or similar purposes. Also, note that we may need to delete your user account in order to delete your Personal Information.

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information. If you contact us with changes, we will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable. Note, however, that information may persist internally for our administrative purposes and that residual data may remain on backup media or for other reasons.

B. OPTING OUT

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of the purchase of a product or service or other transactions and we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.

C. CHOOSING NOT TO SHARE PERSONAL INFORMATION

You may choose not to provide us with any Personal Information. In such an event, you may still be able to access and use some of the Sites; however, you may not be able to access and use those portions of the Sites that require your Personal Information. You may opt out of receiving marketing e-mails by following the opt-out instructions provided to you in those e-mails. Please note that we reserve the right to send you certain communications relating to your account or use of any of the Sites (for example, administrative and service announcements, shipping notices, and order or reservation confirmations) and these transactional account messages may be unaffected if you opt-out from marketing communications.

Where we need to collect Personal Information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

D. MARKETING COMMUNICATIONS

We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising. You can opt-out of such communications as outlined in Section B, above

Please note that you may continue to receive service-related and other non-marketing communications.

IX. DATA SECURITY

NestGSV Inc. and the TGELF Foundation take commercially reasonable security measures to help protect your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. However, please note that transmission over the Internet or wireless networks cannot be guaranteed to be completely secure; and therefore we cannot ensure or warrant the security of any information we collect. You use our Sites and provide us with your information at your own risk.

We have put in place procedures to respond to any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

X. USERS OUTSIDE OF THE UNITED STATES AND INTERNATIONAL TRANSFERS

The Sites are operated in the United States, and NestGSV Inc., the TGELF Foundation and third party service providers and partners operate in the United States and other jurisdictions. If you are located outside of the United States, please be aware that any information you provide to us may be transferred to and processed in the United States and other countries. By using the Sites, or providing us with any information, you consent to this transfer, processing and storage of your information in countries where the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen.

XI. CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

Pursuant to California Civil Code Section 1798.83, residents of the State of California have the right to request from companies conducting business in California certain information regarding NestGSV Inc. and the TGELF Foundation's disclosure within the immediately preceding calendar year of that California resident's Personal Information to third parties (and in some cases, affiliates) for their direct marketing purposes.

If you are a California resident and you have questions about our practices with respect to sharing information with third parties and affiliates for their direct marketing purposes, please send your request to the following email address: community@gsvlabs.com or write to us at the following mailing address: GSVlabs, 2955 Campus Dr #110, San Mateo, CA 94403. You must put the statement "Your California Privacy Rights" in the subject field of your e-mail or include it in your writing if you choose to write to us at the designated mailing address. You must include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labelled or sent properly, or do not have complete information.

XII. QUESTIONS

If you have any questions or concerns regarding this Privacy Policy or our practices, please feel free to contact us via email at community@gsvlabs.com. We can also be contacted by mail at:

NestGSV Inc.

Attn: GSVlabs Legal

2955 Campus Dr #110,

San Mateo, CA 94403

XIII. ADDITIONAL INFORMATION FOR RESIDENTS OF THE EUROPEAN UNION

A. PERSONAL INFORMATION

References to “Personal Information” in this Privacy Policy are equivalent to “Personal Data” governed by European data protection legislation.

B. LEGAL BASES FOR PROCESSING PERSONAL DATA

We will only use your Personal Data when the law allows us to do so. Our legal basis for processing the personal information described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Most commonly, we will use your Personal Information in the following circumstances:

- Where we need to perform obligations relating to a contract to which you are a party or to take steps at your request before entering into such a contract. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Our legitimate interests include those related to conducting and managing our business to enable us to give you the best service /product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Information other than in relation to sending marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us using the contact information provided above.

Processing purpose	Legal basis
To operate the Service	You have entered a contract with us for the provision of the Service and we need to process your personal information to provide services you have requested or take steps that you request prior to providing services. If we have not entered into a contract with you, we may process data, at your request, to enter such a contract or based on our legitimate interest in providing the Service you access and request.
To manage events For research and development To send you marketing communications To create anonymous data For compliance, fraud prevention and safety	These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
For compliance, fraud prevention and safety	Processing is necessary to comply with our legal obligations.
With your consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated when you consent or in the Service.
To share your personal information as described in this Privacy Policy	This sharing constitutes our legitimate interests, performance of obligations arising out of our contract with you or taking steps, at your request, to enter into such a contract, and in some cases may be necessary to comply with our legal obligations.

C. CONTROLLER

NestGSV Inc. and the TGELF Foundation are made up of different legal entities.This Privacy Policy is issued on behalf of NestGSV Inc. the TGELF Foundation and their subsidiaries and affiliates so when we mention “GSVlabs”, “TGELF” “we”, “us” or “our” in this Privacy Policy, we are referring to the relevant company responsible for processing your data. The TGELF Foundation is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below.

D. DATA RETENTION

We retain personal information where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested; to comply with applicable legal, tax or accounting requirements; to establish or defend legal claims; or for fraud prevention). We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, you can ask us to delete your data: see the Request Erasure subsection below for further information.

In some circumstances we may anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

E. CROSS-BORDER DATA TRANSFER

If we transfer your personal information from the European Economic Area to a country outside of it and are required to apply additional safeguards to your personal information under European data protection legislation, we will do so, for instance, by entering into standard contractual clauses for the transfer of data as approved by the European Commission. Please contact us for further information about any such transfers and the safeguards applied.

F. CHANGE OF PURPOSE

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at community@gsvlabs.com.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

G. EU RESIDENT PERSONAL DATA RIGHTS

Under certain circumstances, EU Residents may have rights under data protection laws in relation to your Personal Data as outlined below:

- Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it affects your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact: community@gsvlabs.com.

No Fee Usually Required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints to Supervisory Authority

EU Residents may have the right to make a complaint at any time to the supervisory authority for data protection issues. However, we would appreciate the chance to deal with your concerns before you approach the supervisory authority so please first contact us directly to allow us to do so. You can find your data protection regulator here.