**Advent Leadership Academy** **Alumni Network – Privacy Policy**

This Privacy Policy is issued by Advent International Corporation, a Delaware Corporation having its registered office at Prudential Tower, 800 Boylston Street, Boston, MA 02199-8069, USA (hereafter, the “**Data Controller**”).

The Data Controller offers a platform provided through a third party service provider, KIT United, which enables users to connect with each other, build communities and network (hereafter, the “**Platform**”). The Platform is provided to users who have subscribed on the Platform and as such have a user account (hereafter, the “**Users**” or “**you**”). The Platform is available at the following url address: <https://alaalumni.com>.

The Data Controller uses a solution called “Hivebrite”, which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

This privacy policy is intended for the Users of the Platform of the Data Controller.

If you have any questions, comments or complaints about any aspect of this policy, you may contact the Data Controller at privacyrequest@adventinternational.com.

Date of last update: 2nd January 2023.

1. **COLLECTED PERSONAL DATA**

**1.1 When subscribing on the Platform**

When subscribing to the Platform, the User is informed that its following personal data is collected for the purpose of creating a user account:

Mandatory data:

* First name;
* Last name;
* Email address;
* Advent Leadership academy class

Optional data:

* Diversity and inclusion information such as gender and gender identity, sexual orientation, ethnicity and disability information; and
* Any other personal data the User chooses to provide to the Data Controller in connection with the Advent Leadership Academy or the Platform.

It is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

**1.2 During the use of the Platform**

The User may publish, at its own initiative, content on the Platform, including posts, comments and details of events.

The User is aware that, when using the Platform, the User may decide to provide “special category data” within the meaning of applicable data protection law, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such special category data, the User agrees to their processing by the Platform in accordance with this Privacy Policy.

1. **THE PURPOSE OF THE DATA PROCESSING**

To the extent that European, UK or other applicable data protection law applies to the Data Controller’s data processing activities in connection with the Platform, the Data Controller only processes your personal data where it has a legal basis to do so. The Data Controller and its subcontractors process personal data in connection with the services proposed by the Platform for the following purposes:

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| **Purpose** | **Legal basis** |
| *Creation and management of a user account* | The processing is necessary for the purposes of the Data Controller’s legitimate interests to provide the Advent Leadership Academy Alumni Network to users. |
| *Providing the User with all functionalities of the Platform, meaning:*   * *Sending invitations for events organized by Data Controller or other Users, if the User has accepted to receive such invitations;* * *Sending offers from the Data Controller or its partners if the User has accepted to receive such offers.* * *Invite the User to events organized by the Platform* | The processing is necessary for the purposes of the Data Controller’s legitimate interests to enhance User experience and to optimise networking opportunities. |
| *Management of data subjects rights according to the Personal Data Legislation.*  *Storage of User personal data;* | The processing is necessary for the Data Controller to comply with a legal or regulatory obligation that the Data Controller is subject to. |
| *Making statistics in order:*   * *to improve the quality of the services proposed by the Platform;* * *improve the usage functionalities of the Platform;* | The processing is necessary for the purposes of the Data Controller’s legitimate interests to improve the services provided by the Platform and the User’s experience with it. |
| *Making statistics regarding the effective use of the Platform;* | The processing is necessary for the purposes of the Data Controller’s legitimate interests to provide the User with a user-friendly Platform experience. |
| *Making statistics regarding the different levels of activity on the Platform.* | The processing is necessary for the purposes of the Data Controller’s legitimate interests to understand user activity and to make any relevant changes to be able to provide the best user experience. |
| *Enable the synchronization of the User’s LinkedIn profile;* | The processing is necessary for the purposes of the Data Controller’s legitimate interests to provide the User with easier access to subscribe to the Platform. |
| *Promoting diversity, equity and inclusion across the Data Controller, their boards, their portfolio companies and their advisors* | The User has consented to the processing of their personal data for these purposes. |
| *Identifying and supporting the development of talent* | The processing is necessary for the purposes of the Data Controller’s legitimate interests to encourage Users to use their networking connections. |

1. **DATA RETENTION PERIOD**

Following deletion of a User’s account, the data collected through the User’s account as well as the content published by the User on the Platform will be deleted in accordance with the Data Controller’s data retention policy. The Data Controller may retain the User’s personal data for as long as necessary for (i) the purposes set out in this Policy; (ii) to comply with its legal obligations; or (iii) to comply with its business data retention policies.

1. **DATA TRANSFERS**

The Users’ data are stored in the European Economic Area (EEA) by the Data Controller, its subsidiaries and its trusted service providers. However, depending on the processing, the Users’ data may also be transferred to a country outside the EEA, to our trusted service providers and/or affiliates.

When the country to which the data are transferred does not have a level of protection comparable to that of the EU, the Data Controller uses standard data protection clauses approved by the European Commission and other relevant data protection authorities to provide appropriate safeguards for the User’s personal data that is transferred to those other countries.

1. **EXERCISE OF THE USERS’ RIGHTS**

To the extent that European data protection law (including the GDPR), or UK or other applicable data protection law applies to the Data Controller’s processing of the User’s personal data, you may have various rights with respect to your personal data. Subject to certain exceptions under the applicable law:

* Users have, depending on the legal basis of the processing, a right to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.
* When processing is based on User’s consent, the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.
* The User can exercise its rights by sending an email to the following address [privacyrequest@adventinternational.com](mailto:privacyrequest@adventinternational.com).

In addition, in the event the User has any questions, comments or complaints about any aspect of this policy including enforcement of his or her rights, the User can contact the Data Controller at [privacyrequest@adventinternational.com](mailto:privacyrequest@adventinternational.com). To the extent the applicable data protection law applies to the Data Controller’s processing of the User’s personal data, the User has a right to lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

<http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm>.

1. **COOKIES**

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on the User’s terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the Advent Leadership Academy Alumni Network Cookie Policy, available at www.alaalumni.com/cookies.

1. **RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS’ DATA**

The Data Controller may share your personal data with third parties for purposes consistent with this policy, such as: our affiliates; professional firms that assist us with auditing and other aspects of our internal operations; and third party service providers, such as recruitment and HR consultants. The Data Controller may also disclose your personal data if required to do so by law or in the good-faith belief that such action is necessary to: (i) comply with a legal obligation; (ii) protect and defend the Data Controller’s rights or property; (iii) act in urgent circumstances to protect the personal safety of individuals; or (iv) protect against legal liability.

A list of our main service providers is as follows:

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| **Service Provider** | **Service** | **You can consult the privacy policy by clicking on the following link:** |
| KIT UNITED  44 rue la fayette  75009 Paris  France | HIVEBRITE solution | https://hivebrite.com/privacy-policy |
| Google Cloud Platform  Gordon House, 4 Barrow St,  Dublin, Ireland | Hosting of all data and content produced / provided by the User, as well as images, profile pictures and backups | https://cloud.google.com/security/privacy/ |
| Amazon AWS  38 avenue John F. Kennedy,  L-1855, Luxembourg | <https://aws.amazon.com/compliance/gdpr-center/> |
| Sentry  132 Hawthorne Street San Francisco,  CA 94107  USA | Production and storage of error logs enabling our developers  to correct the code | https://sentry.io/privacy/ |
| Sendgrid  375 Beale Street, Suite 300,  San Francisco, CA 94105  USA | Sending of emails from the Platform | https://api.sendgrid.com/privacy.html |
| Hivebrite, Inc.  16 Nassau St,  New York, NY 10038,  USA | Customer support for the Platform | https://hivebrite.com/privacy-policy |