

## PRIVACY POLICY

Bakery Ventures sp. z o.o.

<https://www.bakery.vc>

Effective date: 1 March 2026

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### 1. Data Controller

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The controller of your personal data within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, hereinafter “GDPR”) is:

Bakery Ventures sp. z o.o., a company incorporated under the laws of the Republic of Poland, entered in the National Court Register (KRS) maintained by the District Court for the capital city of Warsaw (hereinafter “Controller”, “we”, “us” or “our”).

Contact details for data protection matters:

- E-mail: [privacy@bakery.vc](mailto:privacy@bakery.vc)
- Postal address: Bernardyńska 19/33, 02-904 Warsaw, Poland

If you have any questions or concerns regarding the processing of your personal data, please contact us using the details above.

## 2. Scope of this Privacy Policy

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This Privacy Policy applies to all personal data collected through the website <https://www.bakery.vc> (the “Website”), including data collected via contact forms, newsletter sign-up forms, cookies and similar technologies, and any other interactions with the Website.

This Privacy Policy does not apply to third-party websites or services linked from our Website. We encourage you to review the privacy policies of those third parties before providing any personal data.

## 3. Categories of Personal Data Collected

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### 3.1. Data provided directly by you

- Identification data: first name, last name
- Contact data: e-mail address, telephone number
- Professional data: company name, position/role, LinkedIn profile URL
- Communication data: content of messages sent via contact forms or e-mail
- Newsletter data: e-mail address and communication preferences

### 3.2. Data collected automatically

- Technical data: IP address, browser type and version, operating system, device type, screen resolution
- Usage data: pages visited, time spent on pages, referring URL, click patterns
- Cookie data: session identifiers, preference settings, analytics identifiers (see Section 7)

### 3.3. Data obtained from third parties

We may receive personal data from publicly available sources (e.g. company registers, LinkedIn) or from our business partners, solely for the purposes described in Section 4 below.

## 4. Purposes and Legal Bases for Processing

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We process your personal data for the following purposes, based on the corresponding legal bases under Article 6(1) of the GDPR:

#### 4.1. Responding to enquiries and correspondence

- Purpose: To respond to questions, requests and messages submitted via contact forms or e-mail.
- Legal basis: Article 6(1)(b) GDPR (performance of a contract or pre-contractual steps) and Article 6(1)(f) GDPR (legitimate interest in maintaining business communication).

#### 4.2. Newsletter and marketing communications

- Purpose: To send information about Bakery Ventures activities, portfolio news, events and industry insights.
- Legal basis: Article 6(1)(a) GDPR (your consent). You may withdraw consent at any time by clicking the “unsubscribe” link in each e-mail or by contacting us directly.
- Additional legal basis: Article 10(2) of the Polish Act on Provision of Electronic Services (ustawa o świadczeniu usług drogą elektroniczną) and Article 172 of the Polish Telecommunications Act (Prawo telekomunikacyjne).

#### 4.3. Website analytics and improvement

- Purpose: To analyse Website usage patterns, improve functionality and user experience.
- Legal basis: Article 6(1)(a) GDPR (consent for non-essential cookies) and Article 6(1)(f) GDPR (legitimate interest in improving the Website for essential analytics).

#### 4.4. Legal compliance and legitimate interests

- Purpose: To comply with legal obligations (e.g. accounting, tax), to establish, exercise or defend legal claims, and to ensure Website security.
- Legal basis: Article 6(1)(c) GDPR (legal obligation) and Article 6(1)(f) GDPR (legitimate interests).

#### 4.5. Investment-related communications

- Purpose: To evaluate potential investment opportunities, communicate with founders and co-investors, and manage deal flow.
- Legal basis: Article 6(1)(b) GDPR (pre-contractual steps) and Article 6(1)(f) GDPR (legitimate interest in pursuing venture capital activities).

### 5. Recipients of Personal Data

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We may share your personal data with the following categories of recipients, solely to the extent necessary for the purposes described in Section 4:

- IT service providers: hosting, cloud infrastructure, e-mail service providers
- Analytics providers: website analytics tools (e.g. Google Analytics, Hotjar)
- Professional advisors: legal, accounting and audit firms
- Public authorities: where required by applicable law or regulation
- Affiliated entities: companies within the Bakery Ventures group, including MESGA

All processors engaged by us are contractually bound to process data in accordance with our instructions and applicable data protection law (Article 28 GDPR). We do not sell, rent or trade your personal data to third parties for their marketing purposes.

## 6. International Data Transfers

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Some of our service providers may be established outside the European Economic Area (EEA). In such cases, we ensure that your personal data is protected by one or more of the following safeguards:

- An adequacy decision of the European Commission pursuant to Article 45 GDPR (e.g. the EU-US Data Privacy Framework)
- Standard Contractual Clauses (SCCs) approved by the European Commission pursuant to Article 46(2)(c) GDPR
- Binding Corporate Rules approved by a competent supervisory authority pursuant to Article 47 GDPR
- Your explicit consent, where applicable and in accordance with Article 49(1)(a) GDPR

You may request a copy of the safeguards in place by contacting us at the address provided in Section 1.

## 7. Cookies and Similar Technologies

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### 7.1. What are cookies?

Cookies are small text files stored on your device by your web browser. They enable the Website to recognise your device and store certain information about your preferences or past actions.

### 7.2. Categories of cookies used

We use the following categories of cookies:

- a) Strictly necessary cookies: Required for the Website to function (e.g. session management, security). These do not require consent.
- b) Analytics cookies: Used to collect information about how visitors use the Website (e.g. Google Analytics). Placed only with your consent.
- c) Functional cookies: Enable enhanced functionality and personalisation (e.g. language preferences). Placed only with your consent.
- d) Marketing cookies: Used to track visitors across websites and display relevant advertisements. Placed only with your consent.

### 7.3. Managing cookies

When you first visit the Website, a cookie consent banner will be displayed, allowing you to accept or reject non-essential cookies. You may change your cookie preferences at any time through the cookie settings panel accessible via the link in the Website footer.

You may also manage cookies through your browser settings. Please note that disabling certain cookies may affect the functionality of the Website.

### 7.4. Third-party cookies

Third-party service providers (e.g. Google Analytics, social media platforms) may set their own cookies when you interact with their features embedded on our Website. These cookies are governed by the respective third party's privacy policy.

## 8. Data Retention Periods

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We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law. The specific retention periods are as follows:

- Contact form submissions and correspondence: 3 years from the date of the last communication, unless a longer period is required for legal claims.
- Newsletter subscriber data: until you withdraw consent or unsubscribe.
- Cookie and analytics data: up to 26 months (in line with default analytics tool settings), or until consent is withdrawn.
- Accounting and tax records: 5 years from the end of the financial year in which the transaction occurred, in accordance with Polish accounting and tax legislation.
- Legal claims: data may be retained for the duration of the applicable limitation period under Polish law (generally 3 to 6 years).

After the applicable retention period expires, personal data will be securely deleted or anonymised.

## 9. Your Rights as a Data Subject

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Under the GDPR, you have the following rights in relation to your personal data:

- Right of access (Article 15 GDPR): You have the right to obtain confirmation as to whether your personal data is being processed and, if so, to receive a copy of that data.
- Right to rectification (Article 16 GDPR): You have the right to request the correction of inaccurate personal data and to have incomplete data completed.
- Right to erasure / “right to be forgotten” (Article 17 GDPR): You have the right to request the deletion of your personal data where, inter alia, the data is no longer necessary for the purposes for which it was collected, or you withdraw your consent.
- Right to restriction of processing (Article 18 GDPR): You have the right to request the restriction of processing in certain circumstances, e.g. when you contest the accuracy of the data.
- Right to data portability (Article 20 GDPR): You have the right to receive your personal data in a structured, commonly used and machine-readable format, and to transmit it to another controller.
- Right to object (Article 21 GDPR): You have the right to object to processing based on legitimate interests, including profiling. You also have the right to object to processing for direct marketing purposes at any time.
- Right to withdraw consent (Article 7(3) GDPR): Where processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out before the withdrawal.
- Right not to be subject to automated decision-making (Article 22 GDPR): You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.

To exercise any of the above rights, please contact us using the details provided in Section 1. We will respond to your request within one month of receipt, in accordance with Article 12(3) GDPR. This period may be extended by two further months where necessary, taking into account the complexity and number of requests.

You also have the right to lodge a complaint with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych, UODO), ul. Stawki 2, 00-193 Warsaw, Poland, website: <https://uodo.gov.pl>.

## 10. Data Security

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We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction, in accordance with Article 32 GDPR. These measures include, but are not limited to:

- Encryption of data in transit (TLS/SSL)
- Access controls and authentication mechanisms
- Regular security assessments and vulnerability testing
- Employee training on data protection and information security
- Incident response procedures in the event of a personal data breach

Despite our efforts, no method of transmission over the Internet or electronic storage is completely secure. We therefore cannot guarantee absolute security of your data.

## 11. Children's Data

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Our Website and services are not directed at individuals under the age of 16. We do not knowingly collect personal data from children. If we become aware that we have collected personal data from a child without appropriate parental consent, we will take steps to delete that data promptly.

## 12. Automated Decision-Making and Profiling

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We do not currently engage in automated decision-making or profiling that produces legal effects or similarly significantly affects you within the meaning of Article 22 GDPR. Should this change in the future, we will update this Privacy Policy and, where required, seek your explicit consent.

## 13. Changes to this Privacy Policy

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We reserve the right to update or modify this Privacy Policy at any time. Any changes will be posted on this page with a revised "Effective date". Where changes are material, we will endeavour to notify you by e-mail or through a prominent notice on the Website.

We encourage you to review this Privacy Policy periodically. Your continued use of the Website after any modifications constitutes your acceptance of the updated Privacy Policy.

## 14. Applicable Law

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This Privacy Policy is governed by the laws of the Republic of Poland and the European Union, including in particular:

- Regulation (EU) 2016/679 (General Data Protection Regulation)
- The Polish Act of 10 May 2018 on the Protection of Personal Data (ustawa o ochronie danych osobowych)
- The Polish Act of 18 July 2002 on the Provision of Electronic Services (ustawa o świadczeniu usług drogą elektroniczną)
- The Polish Telecommunications Act of 16 July 2004 (Prawo telekomunikacyjne)

## 15. Contact Information

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For any questions, concerns or requests regarding this Privacy Policy or our data processing practices, please contact us at:

Bakery Ventures sp. z o.o.

E-mail: [privacy@bakery.vc](mailto:privacy@bakery.vc)

Bernardyńska 19/33, 02-904 Warsaw, Poland

We will do our best to address your concerns promptly and in accordance with applicable law.