

SOLTEN & CO.

Privacy Policy

Website, research access and communications

Last updated: August 23, 2026

This Policy describes the information Solten & Co. collects through its website and professional research-access process, why it is used, how long it is kept and the choices available to individuals.

1. Scope and controller

This Privacy Policy explains how Solten Ventures LLC, doing business as Solten & Co. ("Solten & Co.," "we," "us" or "our"), collects, uses, discloses and retains personal information through soltenco.com, related forms, research-access requests, email communications and associated online services (the "Services").

Solten Ventures LLC is the controller or business responsible for the personal information covered by this Policy. Privacy questions and requests may be sent to hello@soltenco.com.

This Policy does not govern information processed solely on a client's instructions under a separate written engagement. That information is handled under the applicable agreement and confidentiality terms.

2. Information we collect

We collect information you provide, information generated when you use the Services and limited information from service providers that support the Services.

- **Identity and professional information.** First and last name, employer or organization, job title or role, organization type, country or region, company website, and an optional professional-profile link.
- **Contact information.** Work email address and any contact details included in a message or business correspondence.
- **Research interests and requests.** Topics of interest, requested reports, access history, application status, stated purpose and other information supplied in a research-access or contact form.
- **Communications.** Messages, feedback, corrections, meeting notes and records of our correspondence.
- **Technical and usage information.** Internet Protocol address, browser and device type, operating system, referring page, pages viewed, timestamps, approximate location derived from IP address, and security or diagnostic records. The exact data depends on the Site's hosting, security, analytics and content-delivery configuration.
- **Communication preferences.** Consent records, subscriptions, opt-outs and preferred research topics.

3. Sources of information

Most personal information comes directly from you. Technical data may be generated by your device and collected by hosting, security, analytics, email or content-delivery providers. We may also verify business information against public company websites, professional profiles or other lawful public sources when reviewing a research-access request.

4. How we use information

We use personal information only for defined business purposes, including the following:

- Responding to inquiries and administering research-access requests.
- Manually assessing whether a requester fits the professional audience for controlled research distribution.
- Delivering requested reports, research updates and related communications.
- Planning and improving research topics, content and Services.
- Operating, securing, diagnosing and protecting the Site and our records.
- Maintaining consent, access, suppression, correction and audit records.
- Establishing, exercising or defending legal rights and complying with law.
- Evaluating or completing a business transaction involving Solten Ventures LLC, subject to appropriate safeguards.

5. Research-access review

Research access is reviewed individually and is not automatic. We may consider professional identity, organization, role, geography, stated interests and the relevance of our research to the request. We do not intend to use sensitive characteristics such as race, religion, health, sexual orientation or precise geolocation in this review. We do not make decisions that produce legal or similarly significant effects solely through automated processing.

6. Legal bases for EEA and UK processing

Where European Economic Area or United Kingdom data-protection law applies, we rely on one or more of these legal bases:

- **Consent** for optional research or marketing communications where consent is required. You may withdraw consent at any time.
- **Legitimate interests** in responding to business inquiries, reviewing professional access requests, protecting the Site, preventing misuse, improving our work and maintaining business records, balanced against individual rights.
- **Contract or steps before contract** when processing is needed to respond to a request for services or administer an engagement.
- **Legal obligations and claims** when processing is required by law or needed to establish, exercise or defend legal rights.

7. How we disclose information

We may disclose personal information only as reasonably necessary to the following recipients:

- Service providers that support website hosting, security, analytics, email delivery, document storage, communications and professional operations.
- Professional advisers, including legal, accounting, insurance and security advisers, subject to appropriate duties.
- Authorities, courts or other parties when disclosure is required by law or reasonably necessary to protect rights, safety, systems or evidence.
- A buyer, investor, lender or successor in connection with a proposed or completed financing, reorganization, merger, sale or transfer, subject to confidentiality and lawful-use restrictions.
- Other parties when you direct us or give valid consent.

8. No sale or cross-context behavioral advertising

We do not sell personal information for money. We do not knowingly share personal information for cross-context behavioral advertising, and we do not use sensitive personal information to infer characteristics. If our practices change, we will update this Policy and provide legally required choices before the change applies.

9. Cookies and similar technologies

The Site may use cookies, logs and similar technologies needed for core functions, security, traffic management and limited measurement. The specific technologies may change with the Site's infrastructure. Where non-essential cookies require consent, we will request it through an appropriate notice or preference tool.

You can use browser settings to block or delete cookies. Blocking essential technologies may affect Site operation. Because we do not sell or share personal information for cross-context behavioral advertising, a Global Privacy Control signal does not change such a sale or sharing practice. We will treat legally effective browser signals as required if our practices change.

10. Email and research communications

You may stop non-transactional research or marketing emails by using the unsubscribe method in the message or by emailing hello@soltenco.com. We may keep a limited suppression record so that we can honor the request. Administrative messages about an active request, report delivery, security or an engagement may continue when necessary.

11. Retention

We keep personal information only for as long as reasonably necessary for the purposes described in this Policy, taking account of relationship status, legal obligations, dispute risk, security needs and the sensitivity of the information. Our current operating targets are:

- General inquiries and correspondence: up to 24 months after the last substantive interaction.
- Declined or incomplete research-access requests: up to 12 months after the decision or last activity.
- Approved research-access records: while access or communications remain active and generally for up to 24 months after the last substantive interaction, subject to a longer suppression record after an opt-out.
- Technical, security and diagnostic records: generally up to 12 months, unless a longer period is needed to investigate an incident.

- Contracts, consent evidence, tax, accounting and legal records: for the applicable statutory period or while reasonably needed for a claim.

12. Security

We use administrative, technical and organizational measures designed for the nature and amount of information we handle. Measures may include access restrictions, authentication, secure service providers, encrypted transmission where supported, backups, logging and incident procedures. No transmission or storage system is completely secure, so we cannot guarantee absolute security.

13. International processing

Solten Ventures LLC is a United States company, and information may be processed in the United States or other countries where our providers operate. Those countries may have different data-protection laws. Where required, we use an approved transfer mechanism or another lawful basis for the transfer and apply safeguards appropriate to the information.

14. Your privacy rights

Depending on your location and applicable law, you may have rights to request access, correction, deletion, restriction, objection, portability or information about our use and disclosure of personal information. You may also withdraw consent and opt out of non-transactional communications. Send requests to hello@soltenco.com.

We may request information reasonably necessary to verify identity and authority. Authorized agents may submit requests where permitted by law. We will not discriminate against you for exercising a privacy right. Some requests may be limited by legal exceptions, another person's rights or information that we cannot reasonably verify or connect to you.

If EEA or UK law applies, you may also complain to the data-protection authority where you live or work. If we deny an appealable request under applicable US state law, our response will explain any available appeal method.

15. California notice

This section describes categories of personal information that we may have collected in the preceding 12 months. It applies only to the extent California law applies to Solten Ventures LLC and the relevant information.

- **Identifiers:** name, work email, IP address and professional-profile or account identifiers.
- **Professional information:** employer, company, title, role, organization type and professional interests.
- **Internet or electronic activity:** Site interactions, device and browser data, logs and communications metadata.
- **Inferences:** likely research interests or professional relevance inferred from information supplied in a request.
- **Correspondence:** messages, requests, feedback and records of interaction.

We collect these categories from you, your device, our providers and lawful public business sources. We use them for the purposes in Section 4 and may disclose them to the recipients in Section 7. We have not sold or shared these categories for cross-context behavioral advertising, and we do not offer financial incentives for personal information. Subject to applicable law, California residents may request to know, access, correct or delete information and may exercise other applicable rights by emailing us.

16. Children

The Services are not directed to children under 13, and we do not knowingly collect their personal information. The research-access program is intended for adults acting in a professional capacity. If you believe a child has provided personal information, contact us so that we can review and delete it where appropriate.

17. Third-party services and links

The Services may link to third-party sites or use providers that process information under their own notices. This Policy does not control a third party's independent practices. Review the relevant notice before providing information directly to that party.

18. Changes to this Policy

We may update this Policy when our Services, providers or legal obligations change. The revised version will state a new "Last updated" date. We will provide additional notice or request consent when required for a material change.

19. Contact

Privacy questions and rights requests may be sent to Solten Ventures LLC, doing business as Solten & Co., at hello@soltenco.com.