

Privacy Policy

Effective date: July 18, 2026

Operator: Solten Ventures, LLC, doing business as DueCap

This policy applies to duecap.com and related pages operated by DueCap.

1. Scope and who we are

This Privacy Policy explains how Solten Ventures, LLC, doing business as DueCap (“DueCap,” “we,” “us,” or “our”), collects, uses, discloses, and retains personal information when you visit duecap.com, contact us, request an Investment Screening Brief, or otherwise interact with us through the website or related communications.

This policy covers the website and pre-engagement communications. A separate engagement agreement, confidentiality agreement, or data-processing addendum may apply to a specific client project. If a separate agreement conflicts with this policy, that agreement controls for the covered project.

2. Personal information we collect

Information you provide

Contact and professional information. Your name, email address, phone number, organization, role, investor profile, and other information included in an inquiry or correspondence.

Request and engagement information. The service you are interested in, timing, instructions, scope, transaction or opportunity context, contract and billing information, and records of our communications.

Submitted Materials. Documents or information you send for screening or evaluation, which may include pitch decks, financial statements, cap tables, bank statements, forecasts, contracts, and supporting materials. These materials may contain personal information about founders, employees, investors, customers, suppliers, or other individuals.

Feedback. Comments, survey responses, corrections, and other feedback you choose to provide.

Information collected automatically

When you visit the Site, our hosting, security, and website systems may record your IP address, browser and device type, operating system, referring page, pages requested, date and time, approximate location derived from IP address, and technical events or errors. We may also use cookies, local storage, or similar technologies needed to operate, secure, and understand use of the Site.

Information from other sources

We may receive information from the person or organization that asks us to review an opportunity, from counterparties and professional advisers involved in that opportunity, from

service providers, and from public or commercially available sources when relevant to an agreed engagement.

3. Sensitive and third-party information

Investment materials can contain sensitive financial, ownership, and business information. Before sending Submitted Materials, remove information that DueCap does not need, including passwords, access credentials, Social Security numbers, government identification numbers, full payment-card details, protected health information, and personal bank credentials.

If you provide personal information about another person, you represent that you are authorized to do so and that DueCap may process it for the purposes described in this policy and any applicable engagement agreement. You are responsible for providing any notice or obtaining any consent required by law or contract.

4. How we use personal information

Provide and administer services. Evaluate requests, confirm scope and availability, organize and review materials, prepare deliverables, communicate about an opportunity, and provide support.

Operate and protect DueCap. Maintain the Site, troubleshoot problems, prevent fraud and misuse, secure systems and information, keep business records, and enforce agreements.

Improve our work. Understand how the Site and services are used, correct errors, improve workflows and templates, and develop the DueCap methodology. We do not use identifiable Submitted Materials to publish case studies or train a public model without authorization.

Communicate. Respond to inquiries and send operational messages. We may send occasional updates about DueCap when permitted by law; you may opt out of promotional email at any time.

Comply with law. Meet legal, tax, accounting, security, and regulatory obligations; respond to lawful requests; and establish, exercise, or defend legal claims.

5. Technology-assisted processing

DueCap may use cloud storage, document-processing tools, and AI-assisted analysis tools as part of its internal workflow. These tools may process Submitted Materials and personal information only to support the requested work, under DueCap's direction and subject to the provider settings, contractual protections, and access controls selected for the service. DueCap remains responsible for the final work product and does not rely on automated processing to make an investment decision about an individual or company.

We do not authorize service providers to use confidential Submitted Materials for their own advertising. Where provider controls are available, we select business or privacy settings intended to prevent client content from being used to train general-purpose public models.

6. Legal bases for processing

Where the law requires a legal basis, we process personal information as necessary to take steps at your request or perform a contract; for our legitimate interests in operating, securing, and improving DueCap and communicating with business contacts; with consent where consent

is required; and to comply with legal obligations or protect legal rights. You may withdraw consent at any time, but withdrawal does not affect processing already completed lawfully.

7. How we disclose personal information

Service providers. We may disclose information to providers that support website hosting, security, email, cloud storage, document management, AI-assisted analysis, communications, billing, and professional operations. They may process information only for the services they provide to us, subject to applicable contractual or legal duties.

Professional advisers. We may disclose information to lawyers, accountants, auditors, insurers, and other advisers when reasonably necessary and subject to appropriate duties of confidentiality.

Legal and safety purposes. We may disclose information when required by law or legal process, or when reasonably necessary to protect rights, safety, security, and the integrity of the Site or services.

Business transfers. Information may be disclosed or transferred in connection with a financing, reorganization, merger, acquisition, sale of assets, or similar transaction, subject to appropriate confidentiality protections where practicable.

At your direction. We may disclose information to a founder, investor, adviser, or other party when you ask us to do so or when the disclosure is part of an agreed engagement.

DueCap does not sell personal information for money. DueCap does not share personal information for cross-context behavioral advertising and does not use Submitted Materials for targeted advertising.

8. Cookies and similar technologies

The Site is built on WordPress and may use essential cookies or similar technologies for security, network management, preferences, and reliable operation. Our systems and hosting providers may also use technical logs to detect abuse and diagnose performance.

The Site currently loads web fonts from Bunny Fonts. When those fonts are requested, the font provider may receive technical information such as your IP address, browser information, and the requested resource. The Site may add or change analytics, security, or embedded services over time; when required, we will update this policy and provide consent controls before using non-essential cookies.

Most browsers allow you to delete or block cookies. Blocking essential technologies may affect Site functionality. Because browser “Do Not Track” signals are not interpreted consistently across the industry, the Site may not respond to them. Where legally required and technically applicable, we honor recognized opt-out signals such as Global Privacy Control for activities treated as a sale or sharing. DueCap does not currently sell or share personal information for cross-context behavioral advertising.

9. Retention

We retain personal information only as long as reasonably necessary for the purposes described in this policy, including to evaluate and perform requests, maintain business and security records, comply with law, resolve disputes, and enforce agreements. Retention

depends on the type and sensitivity of the information, the status of the request or engagement, legal requirements, and whether the information is needed to protect DueCap or others.

Submitted Materials are retained for the active request or engagement and for a limited period afterward unless a separate agreement sets a retention period, you request earlier deletion, continued retention is authorized for follow-up work, or law requires or permits us to keep them. Backup copies may remain until overwritten through the ordinary backup cycle.

10. Security

We use administrative, technical, and physical safeguards designed for the nature of the information we handle, including access controls, secure accounts, limited disclosure, and service providers selected for business use. No transmission or storage system is completely secure, and we cannot guarantee absolute security. Email is not always a secure channel; contact us before sending unusually sensitive material if you need an alternative transfer method.

11. Your choices and privacy rights

Depending on where you live and subject to legal exceptions, you may have the right to request access to personal information about you, correction, deletion, a portable copy, restriction of or objection to certain processing, and withdrawal of consent. You may also have the right to opt out of certain sales, sharing, targeted advertising, or profiling and to appeal a denied request.

To make a request, email hello@duecap.com and describe the right you wish to exercise. We may ask for information reasonably necessary to verify your identity and authority. Authorized agents may submit requests where permitted by law, but we may require proof of authorization. We will not discriminate against you for exercising a privacy right.

If you receive marketing email from us, you may opt out using the unsubscribe method in the message or by contacting us. We may still send non-promotional messages about an inquiry, engagement, security, or legal matter.

12. California notice

California law may provide rights to know, access, correct, delete, and obtain information about disclosure of personal information, and to opt out of sale or sharing where those activities occur. The categories of personal information we may collect are identifiers and contact information; professional and employment information; internet or electronic network activity; commercial and engagement records; financial information included in Submitted Materials; correspondence and content you provide; approximate location derived from IP address; and inferences created to perform the requested research service.

We collect these categories from you, your organization, people involved in the submitted opportunity, service providers, and public or commercially available sources. We use and disclose them for the purposes and to the recipients described in this policy. We do not sell personal information or share it for cross-context behavioral advertising. We do not knowingly sell or share the personal information of anyone under 16.

Some California privacy laws apply only to businesses that meet statutory thresholds. Even when a particular law does not apply, DueCap will consider reasonable verified requests concerning personal information that it controls.

13. International users

DueCap is based in the United States. If you access the Site or send information from another country, your information may be transferred to and processed in the United States and other locations where our providers operate. Those locations may have different data-protection laws. Where required, we use an approved transfer mechanism or another lawful basis for the transfer.

Individuals in the European Economic Area, United Kingdom, or Switzerland may contact us to exercise applicable rights and may lodge a complaint with their local data-protection authority. DueCap does not make decisions producing legal or similarly significant effects based solely on automated processing.

14. Children

The Site and services are intended for business and investment professionals and are not directed to children under 18. We do not knowingly collect personal information directly from children. If you believe a child has provided personal information to us, contact us so that we can review and delete it where appropriate.

15. Third-party links

The Site may link to third-party websites or services. Their privacy practices are governed by their own policies, not this one. We encourage you to review those policies before providing personal information.

16. Changes to this policy

We may update this Privacy Policy to reflect changes in our practices, services, or legal obligations. We will post the revised policy with a new effective date. If a change materially affects how we use personal information already collected, we will provide any additional notice or choice required by law.

17. Contact us

Solten Ventures, LLC d/b/a DueCap

555 Bryant Street, Palo Alto, CA 94301, United States

Privacy requests and general inquiries: hello@duecap.com

Website: <https://duecap.com>