Privacy Policy

Version: 2026-04-08

1. INTRODUCTION

At Capsyn, we take your privacy seriously and are committed to protecting your Personal Data. This Privacy Policy explains how we handle your Personal Data, outlines your privacy rights, and describes how the applicable law protects you.
Please refer to the Glossary at the bottom of the Privacy Policy to understand the meaning of any defined terms used.

2. WHO WE ARE

Capsyn, operated by Sean Lenssen, is the controller responsible for processing your Personal Data.
If you have any questions about this Privacy Policy or the processing of your Personal Data, you can contact us at sean.lenssen@capsyn.ai.

3. HOW TO CONTACT US

If you have any general questions or concerns about this Privacy Policy or our processing of your Personal Data, you can contact us at sean.lenssen@capsyn.ai.

4. TYPES OF DATA WE COLLECT ABOUT YOU

We may collect, use, store, and transfer one or more types of Personal Data about you, depending on the nature of your interaction with us. We do not collect any Special Categories of Personal Data about you.

5. HOW YOUR PERSONAL DATA IS COLLECTED

We use various methods to collect Personal Data from and about you, including through the following:

- Direct interactions - You may provide Personal Data to us by filling in forms or by corresponding with us by phone, email, or otherwise. This includes data you provide when you create an account, contact us, complete surveys, participate in events, engage with our customer service and support, or interact with us for business

development purposes.

- Automated technologies or interactions - We may collect Technical Data about your browsing actions and usage patterns as you interact with our Online Services, but only where you have provided your consent. This data may be collected using cookies, pixel tags, server logs, and other similar technologies.
- Third parties or publicly available sources - We may receive Personal Data about you from external sources, such as business partners or services. This includes data obtained from publicly available and third-party databases or services, which we use to supplement the information we collect directly.

6. HOW WE USE YOUR PERSONAL DATA

We use your Personal Data for the following purposes and on the following legal bases:

6.1. To create, manage, and secure your account

We use your Personal Data to create your account, authenticate you, manage login sessions, reset passwords, control access rights, and maintain the security of the Application. This includes authentication through email and password and Auth0.

Lawful basis: performance of a contract; legitimate interests in operating and securing the Application.

6.2. To provide the Application and its core features

We use your Personal Data to provide the services you request through the Application, including access to dashboards, document uploads, document processing, reporting, portfolio monitoring, and related account features.

Lawful basis: performance of a contract; legitimate interests in operating and improving the Application.

6.3. To invite users and manage dashboard access

We use Personal Data such as name, email address, and access context to invite users to the Application and to grant, manage, or revoke access to dashboards and client environments.

Lawful basis: performance of a contract; legitimate interests in enabling our customers and authorised users to use the Application.

6.4. To process subscriptions, billing, tax, and payment-related matters

We use Personal Data to create and manage subscriptions, process payments, issue invoices, calculate and collect applicable taxes, manage billing status, and handle payment-related support or disputes. Payment processing is carried out through Stripe.

Lawful basis: performance of a contract; compliance with legal obligations; legitimate interests in administering payments and recovering unpaid amounts.

6.5. To communicate with you about the service

We use your Personal Data to send service-related communications, including account emails, password reset emails, access invitations, billing notices, important updates, and support communications.
Lawful basis: performance of a contract; legitimate interests in operating the Application and communicating with users.
6.6. To monitor, maintain, and improve the Application
We use Personal Data and technical usage information to troubleshoot issues, maintain performance, detect errors, prevent abuse, investigate incidents, enforce our terms, and improve the reliability and functionality of the Application. Where possible, we use aggregated or de-identified data for analytics and product improvement.
Lawful basis: legitimate interests in operating, maintaining, securing, and improving the Application.
6.7. To comply with legal and regulatory obligations
We may use and retain Personal Data where necessary to comply with applicable laws, tax and accounting obligations, legal requests, dispute resolution, and the exercise or defence of legal claims.
Lawful basis: compliance with legal obligations; legitimate interests in defending our rights and managing legal risk.
6.8. We do not use your Personal Data for advertising or marketing purposes without an appropriate legal basis.

7. GOOGLE USER DATA
When you sign in to Capsyn using your account, or when you grant us access to your Google data through OAuth, we may access certain information from your Google account, depending on the permissions you grant.
- Data Accessed: Basic profile information: name, email address, and profile picture (via Google Sign-In).
- Data Usage: We use the accessed Google data only to (1) authenticate your identity and allow you to log into our application and (2) display your name, email address, and profile picture within your account. We do not use Google user data for advertising or marketing purposes without your explicit consent.
- Data Sharing: We do not share Google user data with third parties except as required to operate our services (for example, cloud hosting or authentication providers listed above), and only in compliance with this Privacy Policy.
- Data Storage & Protection: User data is stored securely on our servers hosted by Render. Access is restricted to authorized personnel only and is protected by industry-standard encryption in transit and at rest.

- Data Retention & Deletion: We retain Google user data only for as long as necessary to provide our services to you. If you choose to disconnect your Google account or request deletion, we will delete all associated Google user data from our systems. You can request deletion at any time by contacting us at sean.lenssen@capsyn.ai.

8. CHANGE OF PURPOSE

We will only use your Personal Data for the purposes for which it was collected, unless we reasonably determine that a different use is compatible. If we ever need to use your Personal Data for an unrelated purpose, we will notify you and explain the legal basis for doing so.

In limited cases, we may Process your Personal Data without your knowledge or consent, but only where required or permitted by law and always in accordance with our legal obligations and data protection responsibilities.

9. INTERNATIONAL TRANSFERS

We may transfer your Personal Data outside the European Economic Area (EEA) or the United Kingdom (UK) to third-party service providers based in other countries.

Where such transfers are to countries that do not offer an adequate level of data protection under applicable laws, we implement appropriate safeguards, such as the European Commission's Standard Contractual Clauses or other approved mechanisms, to ensure your data remains protected.

10. DATA SECURITY

We have implemented appropriate technical and organisational security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed.

11. DATA RETENTION

We retain your Personal Data only for as long as necessary to fulfil the purposes for which it was collected, provide our Services, comply with legal obligations, resolve disputes, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To determine the appropriate retention period, we consider the type and sensitivity of the data, the purpose for Processing, potential risks, and legal requirements.

Where Personal Data is no longer needed, we will securely delete or anonymise it. In some cases, we may retain anonymised data for analytical or statistical purposes indefinitely.

12. YOUR LEGAL RIGHTS

You have the following rights in relation to your Personal Data, subject to certain conditions under applicable data protection laws:

- Access - You have the right to request information about how we Process your Personal Data and to access the Personal Data we hold about you.
- Correction - You may request the correction of inaccurate Personal Data we hold about you.
- Erasure - You may request deletion of your Personal Data where it is no longer necessary for the purposes for which it was collected, or where you have withdrawn consent or successfully objected to Processing, in accordance with applicable law. This includes the right to request the deletion of any Google user data you have authorized us to access through OAuth.
- Restriction - You may request that we suspend the Processing of your Personal Data in certain circumstances. In such cases, we will only retain the data for the exercise or defence of legal claims.
- Portability - You may request to receive your Personal Data in a structured, commonly used, and machine-readable format, and to have that data transmitted to another party, where technically feasible.
- Object / Withdrawal of consent - You may object to the Processing of your Personal Data where we rely on legitimate interest or withdraw your consent at any time where Processing is based on consent.

The exercise of some of these rights (in particular the rights to erasure, restriction of Processing, or objection) may prevent Capsyn from being able to provide all or part of the Services, including paid Services, where the Processing of Personal Data is strictly necessary for the performance of the contract.

13. THIRD PARTY WEBSITES

Our Online Services may contain links to third-party websites or applications, and other websites or applications may link to ours. These third-party services are not under our control, and we are not responsible for their content or privacy practices. We encourage you to review the privacy policies of any third-party websites of applications you visit or interact with.

14. CHANGES TO OUR PRIVACY POLICY

We may update this Privacy Policy from time to time at our sole discretion. If we make any material changes, we will notify you in accordance with applicable legal requirements. By continuing to use our Online Services after any updates take effect, you acknowledge and

agree to the revised Privacy Policy.

15. GLOSSARY

- Data Protection Legislation means any applicable data privacy laws and regulations, including, but not limited to, the General Data Protection Regulation (EU) 2016/679 ("GDPR") and any other applicable data protection laws in the jurisdiction where the Parties operate.
- Google User Data means any information obtained from a user’s Google account through the Google APIs (such as Google Sign-In, Gmail, Drive, or Calendar), subject to the Google API Services User Data Policy.
- Lawful Basis/Bases means the legal grounds on which we are permitted to Process your personal data under Data Protection Legislation.
- Online Services refers to all digital services provided by us, including our private equity investment management application (the "Application") and our website, whether accessed via desktop, mobile, or other devices.
- Personal Data means any information about an individual from which that person can be identified. It does not include where the identity has been removed (i.e. anonymised data).
- Process/Processing means any operation or set of operations performed on Personal Data, whether or not by automated means. This includes collection, use, storage, disclosure, transfer, or deletion of Personal Data.

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