

NEA PRIVACY POLICY

Effective June, 2025

This Privacy Policy describes how New Enterprises, Inc., NEA Management Company, LLC, and their affiliates (“[NEA](#)”, “[we](#)”, “[our](#)”, or “[us](#)”) collects uses, shares, and protects personal information when you interact with us, including through our website and emails (the “[Services](#)”).

Please note that this Privacy Policy does not apply to non-NEA websites or services that state that they are offered under a different privacy policy. Please review the privacy policies on those websites and services directly to understand their privacy practices.

For questions about our privacy practices, please contact us at:

NEA
privacy@nea.com
1954 Greenspring Drive, Suite 600
Timonium, MD 21093

1. INFORMATION COLLECTION

Depending on the nature of your interaction with NEA, we may collect personal information as follows:

- Directly from you, when you provide information to us or interact with us:
 - *Account credentials*, including your email address and selected password when you create a NEA account.
 - *Contact information*, including your name, telephone number, email address, mailing address, and any other information you choose to include when you communicate with us via email, mail, phone, or other channels.
 - *Survey information* in response to questions we may send you, including for feedback and research purposes.
 - *Your image* captured by security cameras at our offices.
 - *Any additional information you choose to provide*, including questions, suggestions, and feedback.
- Automatically from you, *device information and online user activity* when you utilize our Services, as described in the next section.
- From third parties, *information about the marketing and advertisements you have seen or clicked on*, from online advertising companies.

Please note some of this information may be collected by external parties on our behalf.

2. COOKIES AND INFORMATION COLLECTED BY AUTOMATED MEANS

Cookies are small text files stored on your device by your web browser. When you interact with our Services, certain information is automatically collected from you via cookies. This information includes:

- *Usage details* about your interaction with our Services, such as the date, time, and length of visits, specific pages or content accessed, search terms, and frequency of visits.
- *Device information* about the device you use to access our website, such as IP address, device type, unique device identifier, operating system, browser type, and mobile network information.
- *Location information* where you choose to provide our Services with access to information about your device's location.

Cookies help us provide the Services, understanding usage of the Services, serve ads, security, and fraud prevention. We may use third-party cookies on the Services, which are cookies placed by our third-party partners, to help us accomplish these tasks. Our Services use the following types of cookies:

- *Strictly necessary cookies*: These cookies are essential for the Services to function properly and enable basic features like page navigation. Without these cookies, the Services would not function correctly.
- *Preference cookies*: These cookies allow our Services to remember your preferences, such as your region, and provide enhanced, more personalized features.
- *Analytics cookies*: These cookies collect information about how you use the Services, such as the pages you click on. This information helps us improve the performance of the Services.
- *Advertising cookies*: These cookies are used to deliver advertisements more relevant to you and your interests, or to limit how many times you see an ad.

To manage your cookie preferences, please click the Cookie Settings link in the footer to set your preferences. Please note that you will need to set preferences on each device you use to visit our Services.

You can also use a browser that offers you the ability to use the Global Privacy Control to communicate your privacy preferences when you visit our Services; please note this will not affect how we process your information when you interact with our Services. Because definitions and rules for “Do Not Track” have not yet been established, including whether such signals must be user-enabled, we do not respond to “Do Not Track” signals.

You may also opt-out of third-party cookies we use by visiting their opt-out pages. These are examples of our cookie providers, but the list is not exhaustive. In addition, we are not responsible for the effectiveness of any of these opt-out mechanisms:

- We use Google Analytics to collect usage details. You can learn more about privacy and Google Analytics [here](#), and opt out of collection of your data by using the Google Analytics [Opt-out Browser Add-on](#).

- We use Google to customize our advertising and serve you ads based on your browsing behavior, including prior visits to our Services. You can opt out of Google's use of cookies for advertising, including DoubleClick, by visiting Google's [Ads Settings](#).

Below is a list of the cookies that may be set on your device when you visit the Services:

Cookie	Type	Duration	Description
11103163994	Third-Party Analytics	Session	Google Pixel Tracker
s7	Third-Party Analytics	11 months 30 days	Adobe Analytics (Spotify api) Gather data regarding site usage and user behavior on the website.
s7	First-Party Analytics	11 months 30 days	Adobe Analytics Gather data regarding site usage and user behavior on the website.
ga#	First-Party Analytics	1 year 1 month 4 days	Used to distinguish individual users by means of designation of a randomly generated number as client identifier, which allows calculation of visits and sessions
_ga	First-Party Analytics	1 year 1 month 4 days	Records a particular ID used to come up with data about website usage by the user
LTS	First-Party Analytics	29 days	Loyal User
csrf_token	First-Party Analytics	29 days	Protects against hacking and malicious actors.
TERMLY_API_CACHE	First-Party Analytics	1 year	Used to store visitor's consent result in order to improve performance of the consent banner.
VISITOR_PRIVACY_METADATA	server_cookie	5 months 27 days	Used to store the user's cookie consent state for the current domain.
__Secure-ROLLOUT_TOKEN	server_cookie	5 months 27 days	Used by YouTube to manage the phased rollout of new features and updates.
NID	server_cookie	6 months	Set by Google to set a unique user ID to

			remember user preferences. Persistent cookie that stays for 182 days.
IDE	server_cookie	1 year 11 months 29 days	Used to measure the conversion rate of ads presented to the user.
VISITOR_INFO1_LIVE	server_cookie	5 months 27 days	YouTube is a Google-owned platform for hosting and sharing videos. YouTube collects user data through videos embedded in websites, which is aggregated with profile data from other Google services in order to display targeted advertising to web visitors across a broad range of their own and other websites. Used by Google in combination with SID to verify Google user account and most recent login time.
_gcl_a	http_cookie	2 months 29 days	Used by Google Ads for experimenting with advertisement efficiency across websites using their services.
YSC	server_cookie	session	YouTube is a Google-owned platform for hosting and sharing videos. YouTube collects user data through videos embedded in websites, which is aggregated with profile data from other Google services in order to display targeted advertising to web visitors across a broad range of their own and other websites. Used by Google

			in combination with SID to verify Google user account and most recent login time.
Test_cookie	server_cookie	15 minutes	(Doubleclick) A session cookie used to check if the user's browser supports cookies.

3. **HOW WE USE YOUR INFORMATION**

We use the information we collect from you to:

- Provide our Services to you; create and manage your account; and provide requested content.
- Respond to your requests and questions; communicate with you; provide troubleshooting and other customer support; provide important notices; provide you with information that may be of interest to you.
- Manage, maintain, and operate the Services; diagnose or fix technology problems; monitor the performance of the Services; and understand how you access and use the Services.
- Improve the Services and grow our business; better understand our customer base; administer surveys for market research and customer satisfaction purposes; and develop new products and services.
- Design and administer marketing and promotional campaigns and evaluate the effectiveness of these campaigns; send you information on products or services that may be of interest to you.
- Comply with legal requirements; defend against legal claims or other demands; respond to subpoena, court order, or other legal process or request; engage in risk management and compliance activities; protect the rights and safety of NEA, you, or others; and detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- Perform internal administration, auditing, and operations activities.

We may use and share information in an aggregated or de-identified manner data at our discretion, including for research, analysis, modeling, marketing, and improvement of our Services.

4. **HOW WE SHARE YOUR INFORMATION**

We may share the information we collect in the following instances:

- *With service providers* that we believe need the information to perform a technology, business, or other professional function for us such as IT services, accounting, auditing, and tax services, and other professional services.
- *With advertising partners* who assist us in serving advertising regarding the Services to others who may be interested in the Services. These third parties may use tracking technologies to collect or

receive information from the Services and elsewhere on the internet and use that information to provide measurement services and target ads. These advertising partners may allow other companies to access information about you so that they may market other products you may be interested in.

- *With entities in our corporate family*, for purposes consistent with this Privacy Policy, to carry out our business activities, and to the extent permitted by law.
- *With social media platforms*, information about you and your interaction with us. If you interact with social media objects on our Services, both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- *When a corporate event occurs*, we reserve the right to transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Policy.
- *For legal purposes*; where necessary to comply with the law; in response to court orders, law enforcement or legal process, including for national security purposes; to establish, protect, or exercise our legal rights; as required to enforce our terms or other contracts; to defend against legal claims or demands; or to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.

5. HOW WE PROTECT AND STORE YOUR INFORMATION

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

You understand that we may collect, process, and store your personal information in the United States and other countries. Data privacy laws vary from country to country and may not be equivalent to, or as protective as, the laws in your home country. We rely on various legal mechanisms to transfer your personal information outside of your location (if applicable). By using the Services, you understand that we may collect, process, and store your personal information in the United States and other countries.

6. PRIVACY CHOICES

You have the following choices when it comes to how we collect and use your information:

- *Change cookie preferences*: To manage your cookie preferences, please click the Cookie Settings link in the footer to set your preferences. Generally, you can modify your browser setting to disable or reject cookies across the internet; but if you do so, some features of our Services may not function properly or be available. Please note that you will need to set preferences on each device you use to visit our Services.

- *Opt-out of email marketing:* If you no longer wish to receive marketing emails from us, you can click the unsubscribe link at the bottom of our marketing emails.
- *Opt-out of interest-based advertising:* You may be able to prevent third parties from using your information for interest-based advertisements across the internet by using resources from the [NAI](#) or the [Digital Advertising Alliance](#).
- *Update account information:* If you have a NEA account, you can see, review, and update certain information associated with your account, such as your contact information, by logging in to your account.

7. RETENTION

We utilize the following criteria to determine the length of time for which we retain personal information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or as otherwise necessary to investigate theft or other activities potentially in violation of our policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety;
- The privacy impact of ongoing retention on you; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

8. UPDATES TO THIS PRIVACY POLICY

This Privacy Policy may change, so check back to this page periodically to make sure you understand how your personal information will be treated. The date at the top of this Privacy Policy indicates when this Privacy Policy was last revised. If we make material changes to this Privacy Policy, we will notify you through written, electronic, or other means.

9. ADDITIONAL NOTICE: CALIFORNIA RESIDENTS

As a California resident, you have the right to receive certain disclosures regarding our collection, use, and disclosure of your personal information, as well as certain rights to your personal information. California residents will not receive discriminatory treatment for exercising these privacy rights.

Collection and Use

The following chart describes our practices about the collection and use of your information. The categories we use to describe the information are those listed in California law. Some of the categories include very different types of information within the same category and certain personal information may fall into multiple categories. How we use and how long we keep the information within each category will vary, and not all types of information within the same category will be used for all the purposes listed.

Category	Required Information
Personal identifiers	<p><u>Examples of what we collect:</u> Name, email address, unique identifiers (such as those assigned in cookies).</p> <p><u>Sources:</u> Directly from you; from third parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in HOW WE USE YOUR INFORMATION.</p> <p><u>Retention Considerations:</u> Certain information is maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.</p>
Personal information categories listed in the California Customer Records statute	<p><u>Examples of what we collect:</u> Telephone number.</p> <p><u>Sources:</u> Directly from you; from third parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in HOW WE USE YOUR INFORMATION.</p> <p><u>Retention Considerations:</u> Certain information is maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.</p>
Internet or other similar network activity	<p><u>Examples of what we collect:</u> Device ID, browsing history, search history, IP address, interaction with a website.</p> <p><u>Sources:</u> Automatically from you; third parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in HOW WE USE YOUR INFORMATION.</p> <p><u>Retention Considerations:</u> Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.</p>
Audio, electronic, visual, thermal, olfactory, or similar information	<p><u>Examples of what we collect:</u> CCTV footage.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in HOW WE USE YOUR INFORMATION.</p> <p><u>Retention considerations:</u> CCTV footage is deleted at regular intervals when</p>
Sensitive information	<p><u>Examples of what we collect:</u> Password or credentials allowing access to an account.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in HOW WE USE YOUR INFORMATION.</p> <p><u>Retention Considerations:</u> Certain information is maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.</p>

Inferences	<p><u>Examples of what we collect:</u> Interests, preferences, consuming tendencies.</p> <p><u>Sources:</u> Created about you based on information you provide; third parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in HOW WE USE YOUR INFORMATION.</p> <p><u>Retention considerations:</u> Certain information is maintained throughout the life of our relationship with you in order to provide the Services.</p>
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Sale, Sharing, and Other Disclosure of Personal Information and Right to Opt-Out

Any category of information listed in the chart above may be disclosed for a business purpose to service providers and contractors, which are companies or individuals that we engage to conduct activities on our behalf.

California law also requires us to provide you with information regarding the parties to whom we sell (disclosing personal information for monetary or other benefit) or share (disclosing personal information for purposes of cross-context behavioral advertising) your information. Like many companies, we use cookies and other tracking technologies to improve our Services, optimize and analyze your experience, and serve ads relevant to your interests. Some of these uses may be considered a “sale” or “sharing” of your personal information. Below are the types of information we sell or share via cookies: To opt out, please click the Cookie Settings link on the bottom of this page and set your preferences.

We sell or share your information as follows:

- *Identifiers:* Analytics and advertising partners
- *Internet or other similar network activity:* Analytics and advertising partners

We do not otherwise sell your personal information, and NEA does not have actual knowledge that it sells or shares the personal information of consumers under 16 years of age.

Additional Rights

Residents of California have the right to access, correct, and delete certain personal information we collect about them. You or your authorized agent can submit a request to exercise your rights by calling us at 1-410-842-4000 or by emailing us at privacy@nea.com.

For your security and to ensure unauthorized third parties do not access your personal information, we will require you to verify your identity before we can act on your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously. There may be information we will not return in response to your access request, such as information that would interfere with legal requirements. Similarly, there may be reasons why we cannot comply with your deletion request, such as the need to keep your personal information to provide you service or to fulfill a legal obligation.

10. ADDITIONAL NOTICE: INDIVIDUALS IN THE EEA, SWITZERLAND, AND THE UK

Legal Basis for Processing

The legal bases we rely on to process your personal information depend on the Services you use and how you interact with them. We mainly process your personal information because it is necessary to perform our agreement to provide the Services to you or because the processing is necessary for our legitimate interests where those interests do not override your fundamental rights and freedoms related to data privacy. Where we rely on legitimate interest as our lawful basis, our legitimate interest is promoting our business, improving the Services we offer to you and your experience when you interact with us, and ensuring effective operational management and internal administration of our business and the exercise of our rights. In limited circumstances, we may rely on other legal bases for processing your personal information, including when necessary to comply with a legal obligation or where you provide your consent for processing.

Rights

You have the right to access, correct, delete, and obtain a portable copy of certain personal information we have collected about you. You also have the right to object to or restrict the processing of your personal information, such as for direct marketing. Where you have provided your consent to our data processing, you have the right to withdraw consent. While you also have the right to opt-out of automated processing, we do not use personal information to make automated decisions about you in any situations where you may have a legal right to opt out. As an individual in the EEA, Switzerland, or the UK, you can submit a request to exercise your rights by calling us at 1-410-842-4000 or by emailing us at privacy@nea.com.

You also have the right to make a complaint against us by contacting your local supervisory authority for data protection. Contact details for data protection authorities are available at <https://ec.europa.eu/newsroom/article29/items/612080>.