



STARTUP³

Annex 2.1: Data Privacy Policy and GDPR Compliance

February 2020



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 871709.




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1 Introduction

This Privacy Policy describes the personal data collected or processed when you use STARTUP3 Website and Evaluation Platform. It also explains how your personal data is used, shared and protected, what choices you have relating to your personal data, and how you can contact us. STARTUP3 website and evaluation platform (“us”, “we” or “our”) operates the <https://startup3.eu/> website and <https://evaluation.startup3.eu> (the “Service”).

General Data Protection Regulation (GDPR) aims to protect your “rights and freedoms” as individual and to ensure that your personal data is not processed without your knowledge and your consent.

2 What data we collect

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Contact Data”).

**CONTACT DATA:**

First name, Last name, Address, State, Province, ZIP/Postal code, City, Email address, Phone number

When you register on our Platform, we also record data regarding how you heard about STARTUP3.

The data protection declaration is based on the terms used by the European legislator for the adoption of the GDPR. Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners.

3 Why we collect your data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings
- Security Cookies. We use Security Cookies for security purposes Use of personal information that we collect

STARTUP3 project is funded by the European Union's Horizon 2020 research and innovation programme under grant agreement No. 871709. As such, STARTUP3 project has some obligations towards European Commission in terms of reports and statistics. InoSens is a member of STARTUP3 Consortium in charge of STARTUP3 website. Moreover, Media Masters are subcontracted by STARTUP3 Consortium in charge of Open Calls and reports related to the Open Call outcome containing list of applicants and statistics of the calls. All reports related to the Open Call have confidential status, thus meaning that the reports will not be available to general public but only to Consortium members and European Commission.

We use the information we collect from you as follows:

- To allow you to create a profile on STARTUP3 platform in order to apply to STARTUP3 Open Calls;
- To allow you to create a profile on STARTUP3 platform in order to perform tasks as evaluator within Open Call;
- For data aggregation: We retain the right to collect and use any non-personal information collected during your application for statistics purposes that will be part of our reports toward EC. At no time is your personally identifiable information included in such data aggregations.

4 How we use your data

STARTUP3 website uses the collected data for various purposes:

- To provide and maintain the Service;
- To notify you about changes to our Service;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To provide customer care and support;
- To provide analysis or valuable information so that we can improve the Service;
- To monitor the usage of the Service;
- To detect, prevent and address technical issues.

We may also collect information how the Service is accessed and used. It may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Data collected throughout the application process on STARTUP3 Evaluation Platform are processed in order to finalise application process for the STARTUP3 Open Call.

Personal information may be used to communicate with you for you to perform your evaluator task within the Open Call. In addition to the auto-generated email reminders and the personalised email messages sent by STARTUP3 team, if necessary, the STARTUP3 project team may undertake reasonable efforts to contact the applicants via WhatsApp, Viber, Telegram or Signal messages, if they consider this necessary, providing that the applicants can be easily found on these platforms, and that they are available online. The applicants will never be contacted via SMS messages.

5 Transfer of your data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside Serbia and choose to provide information to us, please note that we transfer the data, including Personal Data, to Serbia and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

STARTUP3 website will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Data Privacy Policy and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

6 Service Providers

We do not employ any third-party companies and individuals to facilitate our platform ("Service Providers").

7 Disclosure of Data (Legal Requirements)

STARTUP3 website may disclose your Personal Data in the good faith that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of STARTUP3 website;
- To prevent or investigate possible wrongdoing in connection with the Service;
- To protect the personal safety of users of the Service or the public;
- To protect against legal liability.

8 Protection of your personal data

Data will be treated in a confidential manner and subject to suitable technical and organizational safety measures to prevent alteration, loss or unauthorized access or processing.

9 Management of your personal data

You may have the right to request:

- Access to your personal data;
- An electronic copy of your personal data;
- Correction of your personal data if it is incomplete or inaccurate;
- Deletion or restriction of your personal data in certain circumstances provided by applicable law.

Where we have obtained your consent for the processing of your personal data, you have the right to withdraw your consent at any time. If you have a request regarding your personal data and you wish for them to be changed please contact us. Contact details can be found in the "Contact" section.

You can request removal of your posted Content, but please note that removal may not encompass all possible locations, for example, back-ups or sharing by other users initiated prior to removal.

10 Retention of your data

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

11 Security of your data

Your personal data will never be disclosed to others in contravention of the provisions of this Privacy Policy, GDPR and does not use personal data out of purpose of processing.

We use a variety of technical, administrative, and organizational security measures, including encryption and authentication tools in certain circumstances, to maintain the safety of your personal data. Despite our efforts, no website, database or system is completely secure or “hacker proof.” You can help keep your data safe by taking reasonable steps to protect your personal information against unauthorized disclosure or misuse.

12 Your Data Protection Rights Under GDPR

For the purpose of this Privacy Policy, we are a Data Controller of your personal information.

If you are from the European Economic Area (EEA), our legal basis for collecting and using your personal information, as described in this Privacy Policy, depends on the information we collect and the specific context in which we collect it. We may process your personal information because we need to perform a contract with you, such as when you create a profile with us:

- You have given us permission to do so;
- The processing is in our legitimate interests and it's not overridden by your rights;
- To comply with the law.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the personal information we have on you;
- The right of rectification;
- The right to object;
- The right of restriction;
- The right to data portability;
- The right to withdraw consent.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your personal information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

13 Ethics requirements

Within our project we will not involve human participants as volunteers in terms of collecting and/or further processing previously collected personal data (secondary use). However, in case of involving human participants and personal data collection and/or processing, STARTUP3 consortium envisions the following procedures to address them.

Participants will be provided with an “informed consent form” and detailed “information sheets” that are in English language and are expressed in simple terms (aims, methods, implications and benefits for participants) and will state that participation is voluntary and that anyone has the right to refuse to participate and to withdraw their participation and/or data at any time without any consequences.

14 Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

14.1 Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

14.2 Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party’s site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

15 Subscription on our Newsletter

On the website, users are given the opportunity to subscribe to our newsletters. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The STARTUP3 informs its stakeholders regularly by means of a newsletter about its activities. The newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons,

in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

- The STARTUP3 Newsletters are sent via MailChimp.
- Their Privacy Policy can be viewed at <https://mailchimp.com/legal/privacy/>

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time by communicate this to the controller e.g. by phone.

15.1 Newsletter Tracking

The newsletter contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the STARTUP3 may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analysed by the controller in order to optimize the shipping of the newsletters, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. The STARTUP3 automatically regards a withdrawal from the receipt of the newsletter as a revocation.

16 Our Email policy

We fully comply with national and EU laws regarding SPAM. You can always opt out of receipt of further email correspondence from us. We agree that we will not sell, rent, or trade your email address to any unaffiliated third-party without your permission.

17 Children's Privacy

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian

and you are aware that your Child/ren has/have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

18 Updates to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this policy, we may notify you through our app, on our Website, by a blog post, by email, or by any method we determine. The method we chose is at our sole discretion. We will also change the "Last Updated" date at the beginning of this Privacy Policy. Any changes we make to our Privacy Policy are effective as of this Last Updated date and replace any prior Privacy Policies.

19 Contact Us

We welcome questions, comments, and concerns about our privacy policy and privacy practices. If you wish to provide feedback or if you have questions or concerns or wish to exercise your rights related to your personal data, please write to info@startup3.eu — if you contact us with a privacy complaint, it will be assessed with the aim of resolving the issue in a timely and effective manner.