

PRIVACY STATEMENT:

Phoenix ra (“Startup Refugees” or “we”) is a non-profit organization that supports refugees, asylum seekers, and immigrants in employment and entrepreneurship.

This Privacy Statement applies to the processing of personal data carried out by Startup Refugees as a data controller. Should you have any questions relating to the processing of your personal data, or should you wish to use your rights as a data subject, please contact us on the addressees set out below.

1. Data controller

Phoenix ra
Hämeentie 13 A, 00530, Helsinki Finland
2765975-3
info@startuprefugees.com
www.startuprefugees.com

Data protection officer Phoenix ra
info@startuprefugees.com

2. How we collect data

We collect and process your **Technical Data** (including cookies and web analytics) and **Personal data** (through personal contacts, phone calls, or e-mail correspondence that you may have with us).

Personal Data

Examples of personal data, but are not limited to, are

1) basic information, such as your name, your contact information, 2) all other information you may provide at any stage of the contact process, such as company name, title, or LinkedIn profile.

Technical Data

We and/or our authorized third-party service providers may automatically collect the following Technical Data when you visit or interact with the Startup Refugees Fund:

- Browser type and version

- Device and device identification number
- Time spent on the webpage
- Interaction with the page;
- U The time and date of your visits to the webpage;
- IP address; and
- Operating system and the Internet service providers utilized.

Cookies

We use various technologies to collect and store Technical Data and other information when you visit the Startup Refugees Fund webpage, including cookies. Cookies are small text files sent and saved on your device. They allow us to identify visitors of the webpage and facilitate the use of the webpage as well as to create aggregate information of the Users. Cookies help us to improve the webpage and better serve our users.

We also use tracking and analytics cookies to see how well our services are being received by the Users. Cookies will not harm your device or files. The Users may choose to set their web browser to refuse cookies or to alert when cookies are being sent.

Web analytics services

The Startup Refugees Fund webpage uses Google Analytics and other web analytics services to compile Technical Data and reports on visitor usage and to help us improve the webpage. For an overview of Google Analytics, please visit Google Analytics' site. It is possible to opt-out of Google Analytics with the following browser add-on tool: Google Analytics opt-out add-on.

3. How we use your data

Startup Refugees processes personal data of the Users of the webpage for the purposes described in this Privacy Statement. These processing purposes, of which one or more may apply depending on the case at hand, are listed below:

For customer communication, marketing and development

We process personal data for the purpose of maintaining our customer relationships as well as for marketing and advertising Startup Refugees and the Startup Refugees Fund and other products provided by us. We process personal data also to run, maintain and develop our organization and to create new partner relationships. The legitimate grounds for processing is the legitimate interests of Startup Refugees.

To fulfill our legal obligations Startup Refugees processes data to be able to administer and fulfill its obligations under the law. This includes data processed for complying with our bookkeeping obligations and providing information to relevant authorities such as tax authorities. Personal data may also be disclosed due to mandatory grounds arising from the law or regulations or, if enquired, to the court or competent authority for legal and justified grounds. The legitimate grounds for processing is to comply with legal obligations.

For potential claims handling and legal processes

Startup Refugees may process personal data in relation to claims handling, debt collection, and legal processes. Startup Refugees may also process data for the prevention of fraud, misuse of our services and for data, system, and network security. In these situations, the legitimate grounds for processing is the legitimate interests of Startup Refugees.

For quality improvement, trend analysis and research

We may also process information about your use of the webpage to improve the quality of the Startup Refugees Fund webpage by analyzing any trends in the use of the webpage. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy. We also use pseudonymized or non-personally identifiable data when possible.

4. Legal grounds for the processing

When Startup Refugees processes your personal data for the purposes described in this Privacy Statement, we process your data based on our legitimate interest in the partnership process. We weigh our own interests against your right to privacy.

5. How we may share your personal data

We do not share your personal data with third parties outside of our organization unless one of the following circumstances applies:

For the purposes set out in this Privacy Statement and to authorized service providers

To the extent that we need help from a third for us to fulfill the purpose of this Privacy Statement, we provide such third parties with your data. These third parties process Partner's data as a data controller in accordance with their privacy policies. Furthermore, we may provide your personal data to our affiliates or to authorized service providers who perform services for us

(including, for instance, data storage, accounting, payment, sales, and marketing service providers).

When your personal data is processed by third parties as data processors on behalf of Startup Refugees, Startup Refugees has taken the appropriate contractual and organizational measures to ensure that your data are processed exclusively for the purposes specified in this Privacy Statement and in accordance with all applicable laws and regulations and subject to our instructions and appropriate obligations of confidentiality and security measures.

Please bear in mind that if you provide personal data directly to a third party, such as through a link somewhere on our website, the processing is typically based on their policies and standards.

For legal reasons and legal processes

We may share your personal data with third parties outside our organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, crime, security or technical issues; and/or (iii) protect the interests, properties or safety of Startup Refugees, the Partners or the public as far as in accordance with the law. When possible, we will inform you about such processing.

6. Transfers to countries outside the European Economic Area (EEA)

We use service providers in several geographical locations. As such, we and our service providers may transfer your personal data to, or access it in, jurisdictions outside the EEA or the Partners domicile. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which they are processed.

We provide adequate protection for the transfers of personal data to countries outside of the EEA through a series of agreements with our service providers based on the Standard Contractual Clauses or through other appropriate safeguards, such as the Privacy Shield Framework.

More information regarding the transfers of personal data may be obtained by contacting us on any of the addresses indicated above.

7. How long we will store your data

Startup Refugees does not store your personal data longer than is legally permitted and necessary for the purposes of this Privacy Statement. Some of the personal data may be stored by us only as long as such processing is required by law or is reasonably necessary for our legal obligations

or legitimate interests such as claims handling, bookkeeping, internal reporting and reconciliation purposes.

8. Your rights

Right to access

You have the right to access and be informed about your personal data processed by us. We give all of you the possibility to request a copy of your personal data.

Right to withdraw consent

In case the processing is based on the consent granted by you, you may withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to rectify

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us.

Right to erasure

You may also ask us to delete your personal data from our systems. We will comply with such a request unless we have a legitimate ground to not delete the data.

Right to object

You may have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the provision of the purpose of this Privacy Statement or for compliance with a legal obligation.

Right to restriction of processing

You may request us to restrict the processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data.

Right to data portability

You have the right to receive the personal data you have provided to us yourself in a structured and commonly used format and to independently transmit those data to a third party.

How to use your rights

The above-mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above, including the following information: full name, address, e-mail address, and phone number. We may request the provision of additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

In case you consider our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection. In Finland, the local supervisory authority is the Data Protection Ombudsman (www.tietosuoja.fi).

9. Direct marketing

You have the right to prohibit us from using your personal data for direct marketing purposes, market research, and profiling made for direct marketing purposes by contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

10. Information security

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Measures include for example, where appropriate, encryption, pseudonymization, firewalls, secure facilities, and access right systems. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability to restore the data. We regularly test the Services, systems, and other assets for security vulnerabilities. Should despite the security measures, a security breach occurs that is likely to have negative effects on your privacy, we will inform you and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.