

## Start North - Privacy Policy

### WHO HANDLES THE COLLECTED DATA?

Start North ry, Otakaari 5 A, 02150 Espoo  
[startnorth.com](http://startnorth.com)

### RESPONSIBLE AND CONTACT PERSON

Secretary of the Association: Toni Pienonen  
toni.pienonen@gmail.com  
0400 737 238

### WHOSE DATA DO WE HANDLE?

We handle your data according to this privacy policy, if you are:

- Registered as a participant for a study program or an event
- A Registered user of The Start North Platform
- A Customer
- A Stakeholder representative
- A Cooperation partner

Regardless of who you are, we handle your data as carefully as we would handle our own.

### WHY DO WE HANDLE THE COLLECTED DATA?

We handle your data to take care of operational and administrative duties related to the services we provide and study programs and events we organise. More closely, the purpose of data handling depends on which aforesaid group you are a part of.

- Registered participants, Start North Platform Users, Stakeholder Representatives, and other customers: To provide you with the services you have registered and communicate with you about the possibilities and activities brought up by Start North and our cooperation partners and stakeholders.
- Cooperation partner: If you are a cooperation partner of ours, we handle your data to take care of our cooperation relationship. The data handling is based on our cooperation agreement.

## WHAT DATA DO WE COLLECT?

Depending on the nature of your relationship with us, the information you provide us as with may include the following:

- First & last name
- Job title
- Company or organisation name / Employer
- Contact information
- Age
- Gender
- Homeland

When you access Start North Platform, download our mobile application, or otherwise interact with the digital services we provide such as our web sites, our servers automatically collect your personal data of technical nature (i.e. software versions, phone model and timestamps) or of your native actions that are integral to the Platform features (i.e. the number of messages you have sent and received, or other data based on your similar interactions with the Platform or with other users of the Platform).

Personal data we may collect and process when interacting with Start North Platform:

- Synthetic identifier, associating your user account to an individual mobile or other device;
- Gender (optionally at your choice);
- Technical information about communication between your device and our servers (e.g. software version, phone model, timestamps);
- Search terms you have used;
- Other users you have contacted;
- Number and the duration of the in-app VoIP -phone calls you have made and received;
- Number of chat messages you have sent and received;
- Content of the messages;
- Recommendations you have given
- Your favourites: other users, sessions, organisations, etc.
- Sessions you have reserved a seat to
- Feedback you have provided, and any contact information associated with it

If you are a Registered User, we will collect and process all of the above data and in addition the following personal data associated with your registered account:

- Your name
- E-mail address
- Password (cryptographically hashed);
- Topics
- Photo
- Biography
- Recommendations you have received

- Time you have been available online
- Organisations & chat groups you belong to
- Seat reservations you have made
- Events and Session you have been associated with

**NOTE ABOUT COMMUNICATION AND CONTENT ON START NORTH PLATFORM:** Message and voice communication are protected by data encryption. We do not monitor the content of the communication between our users and voice calls are not recorded or stored by us.

Therefore, you are solely responsible for the relationships you establish on the Platform. We advise you not to provide any confidential information if you do not trust the other party in the Platform. Chat history remains accessible on both participating Users' devices and on our servers needed for the message content relay. In certain circumstances, Us and 3rd parties are technically capable of breaking the encryption of the private messages, access their content, and at least indirectly identify their senders and receivers personally.

## **INTERNATIONAL DATA TRANSFERS**

Due to technical and practical data processing requirements, your personal data may be processed by our subcontractors located outside the European Union or European Economic Area (including Switzerland) as we operate internationally. Countries to which your personal data may be sent to or accessed from, such as The United States of America may have a data protection standard differing from the country in which you are situated.

## **WHERE DO WE COLLECT THE DATA FROM?**

We collect and gain the data from the following sources:

- The personal data of association members is collected from the members themselves.
- Regarding other parties, we gain the data from people themselves for example through our websites or other personal interaction. If you are a representative of a potential cooperation partner or stakeholder, we might collect your data from public information for example from your website.
- Data generated by Start North Platform web and mobile applications.

## **WHO ELSE HAS ACCESS TO THE COLLECTED DATA?**

We use the following service providers regularly for data processing:

- Google
- MailChimp
- Mesensei
- Amazon Web Services

We do not release the collected data for independent use of the third parties and enforce the adherence to this data processing policy with controller-processor agreements.

## **HOW LONG DO WE HAVE ACCESS TO THE COLLECTED DATA?**

We retain your personal data until the termination or expiration of the contract between us after which it will be either anonymised or deleted permanently as part of our data lifecycle management. We take administrative actions for data lifecycle management at least once a year.

The above data lifecycle management rule is always subject to differing requirements possibly included in any mandatory laws applicable to your personal data, its processing and the Offering. Therefore, in some cases, your personal data retention period may be shorter or longer than the above-mentioned.

Notwithstanding the above, the retention of your personal data may always be extended due to our existing or imminent need to establish or exercise legal or administrative claims or defend us against legal or administrative claims related to your personal data, its processing and the Offering.

## **HOW DO WE SECURE THE COLLECTED DATA?**

We use the following safeguards to ensure information security:

- We handle personal data only with up-to-date and information secure stated information systems, which respond to the most typical information security risks.
- We limit access to the collected data only for those association board members, who are justifiable to them and who need them to execute the purposes represented in this privacy policy.

## **YOUR RIGHTS**

You have the following rights. The requests of usage of these rights should be made to the address:

toni.pienonen@gmail.com

- Right to inspect what data about you has been stored in the personal register.
- Right to request the rectification of your personal data
- Right to data portability
- Right to demand erasing your personal data
- Right to deny direct marketing / emails directed at you.
- Right to object the processing of your personal data, provided that we have been processing your data illegitimately or that we have no right to process your personal data.
- Right to lodge a complaint with a supervisory authority (in Finland, this is the Data Protection Ombudsman)

## **MODIFICATIONS TO THIS PRIVACY POLICY**

We will update this privacy policy as and when necessary to align with our own actions and any legislative changes. This privacy policy was last updated on 3.6.2021