

**PRIVACY POLICY OF FUNDACJA ROZWOJU PRZEDSIĘBIORCZOŚCI „TWÓJ STARTUP”****1. Who is Data controller**

Data controller of Your personal data is **FUNDACJA ROZWOJU PRZEDSIĘBIORCZOŚCI „TWÓJ STARTUP”** with its headquarters in Warsaw (Żurawia 6/12 street, office 766, 00-503 Warsaw).

**2. What is the purpose of processing of personal data?**

Your personal data is processed on the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC (General Data Protection Regulation / **GDPR**) as follows:

**Concerning Beneficiaries:**

- A. In connection with the services provided by the data controller, consisting of business incubation, i.e. in order to conclude or perform a contract (Article 6 (1) (b) of the GDPR), Your data will be stored until the contract is performed. Providing data is necessary for the conclusion and performance of the contract;
- B. Fulfilling any binding legal obligations in connection with the cooperation, e.g. related to accounting, tax ordinance or counteracting money laundering (Article 6 (1) (c) of the GDPR), personal data are processed for the period specified by law;
- C. In order to possibly establish, investigate or defend against claims, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until limitation of claims;
- D. In order to ensure the proper implementation of services and to improve their quality by monitoring the activities of the beneficiaries, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until limitation of claims;
- E. If consent is given, Your personal data will be processed within the scope and for the purpose indicated in the consent (the basis of Article 6 (1) (a) of the GDPR). The data will be processed until the consent is withdrawn. Providing data is voluntary, if it is not expressed, it will not be possible to use additional functionalities.

**Concerning Clients:**

- A. In connection with services for companies provided by the data controller, i.e. in order to conclude or perform a contract (Article 6 (1) (b) of the GDPR), Your data will be stored until the contract is performed. Providing data is necessary for the conclusion and performance of the contract;
- B. Fulfilling any binding legal obligations in connection with the cooperation, e.g. related to accounting, tax ordinance or counteracting money laundering (Article 6 (1) (c) of the GDPR), personal data are processed for the period specified by law;

- C. In order to possibly establish, investigate or defend against claims, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until limitation of claims;
- D. In order to ensure the proper implementation of services and to improve their quality by monitoring the activities of the beneficiaries, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until limitation of claims.

**Concerning Contractors, proxies and contractor's staff:**

- A. Verification of the correct authorization to act on behalf of the contractor, including verification of the data provided in public registers, contacting in matters related to the performance of the contract and as legitimate interests pursued by the data controller (the basis of Article 6 (1) (b) and (f) of the GDPR). The data will be processed until the contract is performed, and in the scope of their archiving until the claims are expired. Providing data is necessary for the conclusion and performance of the contract;
- B. Fulfilling any binding legal obligations in connection with the cooperation, e.g. related to accounting, tax ordinance or counteracting money laundering (Article 6 (1) (c) of the GDPR), personal data are processed for the period specified by law;
- C. In order to possibly establish, investigate or defend against claims, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until limitation of claims;

If You have not provided the data directly to the data controller, they have been provided in scope of contact and identification data by the contractor who is a party to the contract with the data controller.

**Concerning Subscribers:**

- A. For marketing and promotion of the products offered by the data controller, which is the legitimate interest of the data controller (Article 6 (1) (f) of the GDPR). Your data will be processed until the objection is raised;
- B. In order to adjust the marketing content based on activities undertaken by You, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until the claims are expired;
- C. In order to possibly establish, investigate or defend against claims, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until limitation of claims.

**Concerning Users of data controller websites:**

- A. In order to ensure the correct implementation of services, improve the quality of services and ensure security, by monitoring user activities, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until the claims are expired;

- B. In order to make contact and answer the questions asked, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until questions are answered or claims are expired. Providing data is voluntary, however, it is necessary to make contact and answer the questions;
- C. Additional information on the rules of processing user data via cookies is available in the cookie policy.

**Concerning Persons contacting with data controller:**

- A. In order to make contact and answer the questions asked, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until questions are answered or claims are expired. Providing data is voluntary, however, it is necessary to make contact and answer the questions;
- B. In order to possibly establish, investigate or defend against claims, which is the legitimate interest of the data controller (the basis of Article 6 (1) (f) of the GDPR). The data will be processed until limitation of claims;

In the case of using services provided as part of an incubator, detailed information on data processing is available on request from the Beneficiary;

In addition, Your personal data may be processed in connection with the use of services as part of the data controller projects. Detailed information on the processing of personal data as part of the projects can be found on the websites of individual projects.

**3. To whom the data is shared?**

- A. Public authorities, to the extent that they do not receive data as part of a specific legal procedure;
- B. Entities that process Your personal data on behalf of the data controller on the basis of an data processing agreement (the so-called processors). These will be, among others: Beneficiaries, IT specialists, archiving companies, entities providing banking and payment services, hosting companies;
- C. External data controllers to whom the data is made available, e.g. legal advisers and attorneys, entities conducting courier or postal activities, entities purchasing receivables - if You do not pay our invoices on time;
- D. Entities located outside the EEA, but only when necessary and with an adequate level of protection, primarily through:
  - a. Cooperation with entities in countries for which a adequacy decision has been issued by European Commission;
  - b. Application of standard contractual clauses issued by the European Commission.

Data controller always informs about the intention to transfer personal data outside the EEA at the stage of collecting them.

#### 4. Automated decision making?

As part of the services provided by the data controller, personal data may be profiled. The data controller will each time inform about such activities before starting data processing by profiling.

#### 5. What are Your rights?

- A. The right to access personal data processed by data controller (Article 15 of the GDPR);
- B. The right to rectify the entrusted personal data, including correcting them (Article 16 of the GDPR);
- C. The right to delete personal data from our systems, the so-called "right to be forgotten" - if in Your opinion there are no legal grounds for processing of Your data, You can request their deletion (Article 17 of the GDPR);
- D. The right to limit the processing of personal data - You may request that the processing of personal data be restricted only to their storage or to perform actions agreed with You, if the controller has incorrect data about You, processed unreasonably; or if You do not want removal of data because You need them to establish, assert or defend claims; or for the duration of the objection to data processing (Article 18 of the GDPR);
- E. The right to data portability - You have the right to receive from the data controller in a structured, commonly used and machine-readable format (eg ".csv" format) personal data concerning You, which are held by the data controller on the basis of a contract or consent (Article 20 of the GDPR);
- F. The right to withdraw consent to the processing of personal data - You have the right to withdraw Your consent to the processing of personal data processed on the basis of consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal (Article 7 (3) of the GDPR);
- G. Right to object - You may object to the processing of Your data, if the basis for the use of data is the legitimate interest of the data controller. In such a situation, after considering Your request, Your data will not be to the extent covered by the objection on this basis, unless the controller demonstrates the existence of legitimate grounds for data processing, which are considered overriding Your interests, rights and freedoms (Art. 21 GDPR);
- H. If, in Your opinion, the processing of personal data violates the provisions of the GDPR, You have the right to lodge a complaint with the supervisory body, i.e. the President of the Personal Data Protection Office.

#### 6. Contact

If You need additional information related to the protection of personal data or would like to exercise Your rights, please contact us at the following e-mail address: [rodo@twojstartup.pl](mailto:rodo@twojstartup.pl).