



PRIVACY POLICY (GDPR)

This privacy policy concerns the websites <https://innovationstarter.bg/> and <https://innovationexplorer.bg>.

It does not concern the collection of information via other channels.

By using our website, you consent to the collection, processing and disclosure of your personal information, as set out below in this policy. In the case that you do not agree to this, please refrain from using this website.

This Privacy Policy covers the processing and protection of personal data in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

We understand the inviolability of private life and we commit to win the trust of our clients, by adopting very high standards for the protection of the private information. Our privacy policy describes the types of private information, which we collect and receive, the circumstances under which we collect or receive private information, the rules and procedures we have set down for its processing and safekeeping, as well as the sharing of certain types of private information in certain limited circumstances, the procedures, which you have to follow, if you have any questions or queries in regards to your personal information or our rules and procedures, as well as the details of the entity towards which questions or queries of such nature have to be forwarded, as well as the means with which you communicate with this entity.

Below you will find the information:

- regarding the entity responsible for the processing of your information;
- the categories of personal information we process;
- the circumstances under which we process the information;
- regarding the goals and legal reasons for the processing;
- terms for safekeeping and security measures of the information;
- how to exercise your rights under the GDPR (General Data Protection Regulation);

as well as in which cases and how we share your personal data with third parties.

In this policy Innovation Starter stands for: “Innovation Starter Box Ltd.”, UIN 202912458, VAT BG202912458, 2 Apostol Karamitev Str., Sofia, Bulgaria

RESPONSIBLE ORGANISATIONS

For the purposes of the EU General Data Protection Regulation (GDPR) (EU) 2016/679, the responsible entity is:



“Innovation Starter Box Ltd.”, represented by Mrs. Leona Aslanova. For any questions in relation to the data protection, you can contact the manager of the aforementioned JSC via e-mail at:

Mrs. Leona Aslanova, Manager at “Innovation Starter Box Ltd., with UIN: 202912458, with headquarters and management address: Sofia, 2 Apostol Karamitev Str.

DEFINITIONS

“Our websites”, „The Site/Website” and “Website of Innovation Starter“ refers to the websites <https://innovationstarter.bg/> and <https://innovationexplorer.bg/>, which are preparatorily owned and managed by Innovation Starter Box Ltd.

“Innovation Starter” refers to “Innovation Starter Box Ltd.”

WHAT TYPES OF INFORMATION AND DATA DO WE COLLECT

Contact details: name, email address, telephone number, company/institution, in case you send us a query, in case you subscribe to our newsletter, or in case you register in our event website for event.

Payment details: credit/debit card number, IBAN and any other information contain within the invoices issued by “Innovation Starter” and any forwarded payments, in case you become a purchaser of our products or service.

Business or Company details: contact details, e-mail address, credit/debit card number or bank account number, in case the purchaser of our product/service is a legal entity.

Details for the Website’s use: you can learn more about the information regarding your relationship with the Website, as well as its settings and management in this privacy policy, in chapter *Use of “cookies”*.

When you visit our Website, our server temporarily saves details of your access in its logs. These logs contain the following data, and are kept until their automatic deletion:

- The IP address of the computer making the request
- The date and time of your request
- The requested URI
- The amount of data transferred to you in response
- Whether the request was successfully processed or not
- Identifying data about the browser and operating system you use
- The referring website from which you made the request
- The name of your Internet Service Provider

The purpose of collecting this data is to make it possible to serve the website to you (by establishing a TCP/IP connection), to secure our servers, the technical



administration of our infrastructure as well as the optimisation of our services. Only in the case of unauthorised access or attacks on our infrastructure will your IP address be analysed.

No further information is required from you in order to access our website.

INFORMATION COLLECTION METHOD

The information you will provide us with, in case you subscribe to our online newsletter, in case you send us an email to our email addresses shown on our Website, or in the case that you register for our event Website.

Automatically via cookies, in relation to the applicable legislation we use tracking technology such as cookies for the anonymous collection of your data.

From third parties, such as social media platforms, service providers for commercials and analysis.

WHY WE COLLECT YOUR INFORMATION?

In case you provide us with your explicit consent, your details will be used for the provision of information regarding news, related to our business activities.

We use the information to answer your queries. We will use your information to provide the services you have requested.

We use the information for the improvement of our website and services. We can use the information for the improvement of the services we provide.

We use the information for the analysis of the effectiveness of our website. We may process your information on an anonymous basis to improve the site's performance.

We use information for marketing purposes. We may send you information about new services and offers. We may also use your information to advertise our offers. In case you sign up for our newsletter, you will receive our promotional emails.

Before we start any marketing activities towards you, we will ask for your consent in accordance with the current legislation. Below you can read more about your consent and how you can control it.

We use your personal information to communicate with you. We may contact you on your request.

We also use information in other ways permitted under current law.

SECURING YOUR DATA



In order to secure your data, we have implemented technical and organizational measures that meet the requirements of the GDPR, and require any third-party service providers we use to do the same.

When we use third parties to provide the services, for example email and infrastructure service providers, these third parties are only engaged after a comprehensive review. This review carefully considers each third party's competence as well as their technical and organisational data protection measures. The results of this review are recorded in writing, and a data processing agreement which is compliant with Article 28 of the GDPR is signed with the third party.

Your data is stored only on secure servers, accessible only by several authorized employees. When you use a form on our website to send us data, this transmission is only performed via an encrypted TLS connection. When you use a form on our website to transmit data to us, this transmission is only performed over an encrypted TLS connection.

THIRD-PARTY SERVICE PROVIDERS IN NON-EAA COUNTRIES

In order to provide our services, we use third-party services located outside the European Economic Area. To protect your personal data in this case, we have signed special data processing agreements with these service providers.

We use the following third-party service providers:

- Service providers which Innovation Starter uses to send emails
- Service providers who offer server storage.

USE OF COOKIES

In addition to the previously listed data, cookies will be saved on your computer when you use our website. Cookies are small pieces of textual data which are saved on your hard disk by your web browser, through which Innovation Starter, who sets the cookie's contents, can collect certain information about you. Cookies cannot execute any code, nor transfer any viruses to your computer. We use them in order to anonymously or pseudonymously analyse the use of the website, and present relevant offers to you.

This website uses the following types of cookies, whose scope and functionality is detailed in the following paragraphs:

- Transient cookies are automatically deleted when you close your browser. They are used particularly as session cookies. These save a so-called "session ID" which is used to link subsequent requests made by your browser to each other. Through this, your computer can be recognised when you return to our website. These session cookies are deleted, when you log out, or close your browser.



- Persistent cookies are only deleted after a predetermined duration, which can be different for each cookie. You can delete these persistent cookies anytime, though the “Settings” configuration of your browser. We advise you, that if you do so, that not all functionality of this website will be available.

The placement of cookies on your computer can be prevented through the relevant settings of your internet browser. Previously set cookies can also be deleted through the settings of your browser. We advise you that preventing the placement of cookies on your computer can mean that not all functionality of our website are available without limitations.

You can generally opt out of the use of cookies by changing your browser settings. For more information about cookies, visit <http://www.aboutcookies.org>. If you choose to not have your browser accept cookies from the Innovation Starter website, you will be able to view our website, however, you will not experience a personalized visit, nor will you be able to subscribe to the service offerings on the website.

FACEBOOK

Innovation Starter has integrated Facebook into its website.

The responsible entity for Facebook is:

Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States.

When a data subject lives outside the United States or Canada, and Facebook undertakes data processing, the responsible entity is:

Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

When a user clicks the Facebook button, Facebook’s website will be contacted, and user acquisition data will be transferred from Innovation Starter to Facebook. Facebook will receive through this the information that the user has visited Innovation Starter’s website. Details of the Facebook-supplied plugins can be accessed at: <https://developers.facebook.com/docs/plugins>

If the user is logged into a Facebook account (even if it is not their own account) at the same time that they access they Innovation Starter website, Facebook will additionally receive a notification that they have visited Innovation Starter’s website. Facebook collects this information, so the theoretical possibility exists that it could associate it with the Facebook account. The same also applies to the “Like” button, or to the usage of Facebook comment forms; Facebook could associate this information with the logged-in Facebook account.

To prevent this, you can log out of any Facebook accounts prior to visiting the Innovation Starter website. To do this, you must visit the Facebook website.



For further information relating to data protection and Facebook, please see: <https://facebook.com/about/privacy>

LINKEDIN

Innovation Starter uses LinkedIn on its website.

The responsible entity for LinkedIn is:

LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA

If the user is logged into a LinkedIn account (even if it is not their own account) at the same time that they access the Innovation Starter website, LinkedIn will additionally receive a notification that they have visited Innovation Starter website. LinkedIn collects this information, so the theoretical possibility exists that it could associate it with the LinkedIn account.

To prevent this, you can log out of any LinkedIn accounts prior to visiting the Innovation Starter website. To do this, you must visit the LinkedIn website.

For further information relating to data protection and LinkedIn, please see:

<https://www.linkedin.com/legal/privacy-policy>

CHANGES TO THIS PRIVACY POLICY

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We also recommend that you consult this statement on a regular basis, so that you remain informed of any changes.

LEGAL BASIS FOR PROCESSING PERSONAL DATA

In order to process personal data, a lawful ground must exist. A number of permitted grounds for processing are enumerated in Article 6 of the GDPR.

One ground for the processing of personal data is Article 6, Paragraph 1(a) of the GDPR, which is the freely given consent of the data subject to do so. This consent is bound to a particular purpose. A second ground for the processing of personal data is in order to fulfil the requirements of a contract, as specified in Article 6, Paragraph 1(b) of the GDPR. However, this clause must be understood to include the initiation of a commercial relationship with the corresponding data processing. This ground applies to Innovation Starter, in the case that Innovation Starter decides to invest in a company that meets the mandatory requirements for this. Article 6, Paragraph 1 (c) of the GDPR permits the processing of personal data where a legal requirement to do so exists. Article 6, paragraph 1(d) permits the processing of personal data in exceptional circumstances, where doing so is necessary to protect the vital interests



of the data subject. It is also possible that personal data will be processed on the basis of Article 6, paragraph 1(f) of the GDPR. This is the so-called “legitimate interests” ground, which is interpreted with reference to Recital 47 of the GDPR.

DELETION OF PERSONAL DATA

Innovation Starter only keeps and processes personal data for so long as it is necessary. When the purpose of the data processing has been fulfilled, your personal data will be deleted in accordance with our data retention policy, unless we are legally required to retain it.

YOUR RIGHTS

You have the following rights concerning your personal data:

- The right to access your personal data
- The right to correct or delete your personal data
- The right to restrict processing of your personal data
- The right to object to the processing of your personal data
- The right to data portability
- The right to confirm whether your personal data is being processed or not.

If you have given your consent to the processing of your personal data, you can withdraw this consent at any time. Such a withdrawal of consent will only affect the processing of your data after it is given.

Should we continue to process your personal data because we assess our legitimate interests to do so outweigh your legitimate interests (per Article 6, paragraph 1(f) of the GDPR) you may object to this processing. This is only applicable in the case where the processing of personal data is not required in order for us to fulfil a contract with you. To exercise such an objection, we request that you detail the grounds based on which we should no longer process your personal data. We will check the details of your circumstances based on the grounds you provide, and either stop processing your personal data, or detail to you the legal basis on which we continue to process your personal data.

HOW YOU CAN EXERCISE YOUR RIGHTS

Should you wish to exercise any of these rights, you will need to provide proof of identification that you are the person to whom the data relates. The data you will receive includes data we have related to you, the source of that data, the recipients, or types of recipients to whom the data was transferred, and the purposes for which the data was stored. To exercise these rights, please contact the manager of Innovation Starter.

SECURITY



We take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.

We have put in place various security procedures. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to user information. We use secure server software (SSL) to encrypt the information you input before it is sent to us, and our database is hosted in a secure data centre. Whilst we cannot ensure or guarantee that loss, misuse or alteration of data will not occur, we use our best efforts to prevent this.

We do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to provide us with their personal information without verifiable parent or guardian consent. If you are under 18, do not send any information about yourself to us, including your name, address, telephone numbers, or email address, unless you have your parent's or guardian's permission. In the event we learn that we collected personal information from anyone under the age of 18, and do not have a parent or guardian's consent, we will delete that information as quickly as possible.

Our Website may contain links to other websites which are outside our control and are not covered by this Privacy Policy ("Third-Party Websites"). If you access Third-Party Websites using the links provided, the operators of such sites may collect information from you which will be used by them in accordance with their own privacy policies, which may differ from ours. We encourage you to review the privacy policies of those Third-Party Websites so that you understand if/how they collect and/or use information from you or your computer.

COMPLAINTS

In any case, under the applicable legislation, if you consider that the processing of personal data relating to you infringes the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to processing of personal data and on the free movement of such data) you have the right to lodge a complaint with the supervisory authority in the State of your habitual residence, place of work or place of the alleged infringement.

The supervisory authority that is responsible for monitoring the application of the General Data Protection Regulation in Bulgaria (Innovation Starter is established in Bulgaria), in order to protect the fundamental rights and freedoms of natural persons in relation to processing their personal data is the Commission for Personal Data Protection, with contact details as follows: address: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592, web-site: www.cpdp.bg.

CONTACT

Should you have further questions, or wish to make contact with us, you can do so through our website at <https://innovationaccelerator.bg>. When you do so, the data required to answer your query will be automatically saved and processed. Your data will not be transferred to third parties unless Innovation Starter has a lawful ground to do so.

The present Privacy Policy (GDPR) shall enter into force as of August, 1st 2019.