



## Sting Privacy Policy

Last updated: 2019-05-03

When you use our Services, you entrust us with your personal data. We are committed to keeping that trust. That starts with helping you understand our privacy practices. This privacy policy explains how we collect and use your personal data and cookies. It also describes your rights towards us and how you can exercise them. We will only use the information you provide in accordance with this privacy policy and the General Data Protection Regulation (EU 2016/679).

### COLLECTION OF PERSONAL DATA

We will receive and collect personal data from you and from third parties when you are using our Services.

#### 1 PERSONAL DATA THAT YOU GIVE US

1.1 You may choose to give us your personal data. This includes information submitted when you use our Services or if you contact us. We will process the following categories of personal data that you give us:

- (a) When you subscribe to our newsletter: name, email, and company name.
- (b) When you sign up for an Event directly with us: name, email, and company name.
- (c) When you apply for a Program or participation as a startup at one of our events: contact person name and email, name of the members of the team, as well as company name, company address, company funding and ownership.
- (d) When you sign up for an Open Coaching session: Name, email, and company name.
- (e) When you send us an open job application and/or when you apply for a specific job opportunity: Name, email, contact details, records to evaluate your suitability for the position and future career opportunities, your CV and personal letter, as well as other personal data as may be relevant for the specific application.
- (f) When you sign up for a "Join a startup" matchmaking event directly with us: name, email, phone number, experience, education, skills, and what kind of engagement you are looking for.
- (g) If you contact us: We may ask for additional personal data other than as informed above, in order to assist you.

## 2 PERSONAL DATA THAT WE COLLECT

2.1 We may collect the following categories of personal data when you use our Services:

- (a) Device information: We may collect information about the device you use to access our Services, including the device identifier, geolocation, and IP-address.
- (b) How you use our Services: We may collect information on how you use our Services, such as information regarding how often you visit our Website and which pages you visit on the Website.

## 3 PERSONAL DATA THAT WE RECEIVE FROM THIRD-PARTY SOURCES

3.1 We will process personal data that we collect from third-party sources. The following categories of personal data may be collected:

- (a) When you sign up for an Event through a third-party event organizer: name, email, and company name.

## OUR USE OF PERSONAL DATA

### 4 HOW WE USE AND KEEP YOUR PERSONAL DATA

4.1 We use your personal data to be able to provide our Services and fulfill our commitments towards you. We process personal data based on the following legal grounds.

<b>PURPOSE OF THE PROCESSING</b>	<b>LEGAL BASIS</b>	<b>HOW LONG WE KEEP YOUR PERSONAL DATA</b>
Manage Your Startup's application to our Programs, administer Your Startup's participation in our Programs, and otherwise manage our Programs.	Fulfill our contractual obligations towards you.	For three years after the end of the Program, or as long as Your Startup is an active alumni, whichever is longer.
Administer bookings of Open Coaching sessions and provide Open Coaching.	Fulfill our contractual obligations towards you.	For three years after the end of the Open Coaching session.
Administer our Events, such as reservations.	Fulfill our contractual obligations towards you.	After the Event has been held. However, invitations to our upcoming Events will be sent out as informed below.

Send you our newsletter, invitation to our Events (including “Join a Startup”), and other information regarding our Services.	Fulfill our contractual obligations towards you and to pursue legitimate interest.	For as long as we send out such information, unless you unsubscribe.
If you contact us.	Fulfill our contractual obligations towards you.	For as long as is necessary to assist you.
Improve our Website and understand how our Website is used.	Pursue legitimate interest.	For one year after your visit.
Manage your open job application or application to a specific job position.	Fulfill our contractual obligations towards you.	Your application will be stored no more than two years after the position has been filled.
Matchmaking in connection with your participation in a “Join a Startup” matchmaking event.	Fulfill our contractual obligations towards you.	Your personal data, except for contact details, will be deleted after the “Join a Startup” event has been held. However, invitations to our upcoming events will be sent out as informed above.

4.2 Your personal data will be deleted by us when the processing is no longer necessary for the purposes stated above, except if required by applicable laws. In such case, we keep the data only as long as necessary or mandated by law for such purpose, such as for book keeping purposes.

## 5 SHARING OF PERSONAL DATA

5.1 When providing our Services, we may transfer or share your personal data with selected third parties. These third parties are limited by law or contract from using the personal data for purposes beyond those for which the personal data is shared. We take all reasonable legal, technical, and organizational measures to ensure that your personal data is treated securely and with an adequate level of protection when transferred to or shared with such selected third parties. We may share your personal data with the categories of third parties as specified in this section below.

5.2 We use subcontractors to provide our Services. When doing so we may transfer your personal data to subcontractors for the performance of our contractual obligations towards you and for the other purposes described in this privacy policy. We use the following categories of subcontractors:

- (a) Resource Partners, such as third-party business, legal, financial, and marketing expertise;
- (b) Cloud services provider, to provide cloud services to us;

- (c) Newsletter management services provider, to manage our newsletter;
  - (d) Web hosting services provider, to host our Website; and
  - (e) Event management services provider, to manage reservations and information regarding our Events.
  - (f) Job matching platforms, to manage our recruitment service.
- 5.3 For the purpose of providing Your Startup with certain opportunities when Your Startup participates in a Program, such as investments, loans and business opportunities, we may share your personal data with the following relevant third-parties within such field:
- (a) Investors and business angels; and
  - (b) Companies, foundations, and organizations.
- 5.4 We may disclose necessary personal data to authorities such as the police, tax agencies or other authorities if we are required by law or you have agreed to it. An example of legally required sharing is for the purposes of anti-money laundering and counter-terrorist financing.
- 5.5 In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party, personal data about our customers may be disclosed and transferred.

## 6 COOKIES

- 6.1 We use cookies when providing our Services, to enhance and facilitate your experience, and to create statistics regarding your use of our Services. A cookie is a small text file that contains text information which is saved on your device. We use two types of cookies, session cookies that expire when you close the browser, and permanent cookies which are stored until they expire.
- 6.2 If you do not want to accept cookies, you may adjust your web browser settings either to not accept cookies or to indicate when a cookie is used. Please note, by disabling cookies some features in our Services might not work as intended.

## MISCELLANEOUS

### 7 YOUR RIGHTS

- 7.1 You have a right to access your data. Therefore, you may request a transcript of records if you would like to know and verify your personal data stored and processed by us. The request must be made in writing including a verification of you, and sent to the address below.

- 7.2 We take all reasonable steps to ensure that your personal data is correct and up-to-date. You have the right to correct inaccurate or incomplete information about yourself. If you believe that your personal data stored by us is incorrect, please notify us and provide us with the correct data.
- 7.3 You have the right to request the deletion of your personal data insofar as this personal data is no longer necessary for the purpose it was collected (“right to be forgotten”). However, certain legal obligations prevent us from immediately deleting all of your data, such as obligations in accounting laws, tax laws and anti-money laundering laws. Data that must be preserved for legal reasons will be blocked from use for any other purposes than meeting such legal requirements.
- 7.4 You have the right to object to our processing of your personal data. The effect may be that you are no longer able to use our Services. If you object, we will stop the processing of your personal data.
- 7.5 You have a right to data portability. In case you want to utilize such right, please contact us by using the information below.
- 7.6 If you have any inquiries regarding our processing of your personal data, please contact us. If you are displeased with our processing of personal data, you may file a complaint to the Swedish Data Protection Authority (Sw. Datainspektionen), [www.datainspektionen.se](http://www.datainspektionen.se), or with the equivalent authority in the EU-member state where you live.

## 8 SECURITY

- 8.1 We are using adequate technical and organizational security measures to ensure that your personal data is not misused, lost or unlawfully accessed. We only give access to your personal data to those employees who require it to provide our services.

## 9 UPDATES TO THIS POLICY

- 9.1 We may occasionally update this privacy policy. If we make significant changes, we will notify you of the changes through our Services or through other means such as email. To the extent permitted under applicable law, by using our services after such notice, you accept the updates.
- 9.2 We encourage you to periodically review this privacy policy for the latest information on our privacy practices.

## 10 CONTACT INFORMATION

- 10.1 If you have any questions regarding our processing of your personal data, or any question, complaint or claim, please contact us at:

Stockholm Innovation & Growth AB, reg. 556489-3781

Address: KTH Campus, Drottning Kristinas väg 53, 114 28 Stockholm, Sweden

[info@sting.co](mailto:info@sting.co)

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