

## SLUSH PRIVACY STATEMENT

Slush Oy (“**Slush**”, “**we**”) provides the websites [slush.org](https://slush.org) and [platform.slush.org](https://platform.slush.org) as well as the online ticket store and matchmaking platform available through the above mentioned websites (the websites, the online ticket store and the matchmaking platform jointly the “**Slush Services**”). For these purposes Slush may collect and process personal data of the users of the Slush Services (“**Users**” or “**you**”).

Our Privacy Statement explains what data we process, how we do that and how you may use your rights as a data subject (e.g. right to object, right of access).

This Privacy Statement may be updated from time to time. You can find the current version on the [slush.org](https://slush.org) website. This Privacy Statement only covers data processing carried out by Slush.

In this Privacy Statement, the startup and technology events organized by Slush to which the Slush Services are related are referred to as the “**Events**”.

### 1. CONTROLLER’S CONTACT DETAILS

Name: Slush Oy

Business ID: 2554151-6

Correspondence address: Pursimiehenkatu 29-31 F 316, 00150 Helsinki

E-mail: [support@slush.org](mailto:support@slush.org)

Contact person:

Name: Niina Arvila

E-mail: [niina.arvila@slush.org](mailto:niina.arvila@slush.org)

### 2. PERSONAL DATA PROCESSED AND SOURCES OF DATA

The personal data of Users collected and processed by us in connection with the provision of the Slush Services can be divided into two general data categories: User Data and Technical Data.

#### User data

User Data is personal data collected directly from you or from our customer organization which you represent and on behalf of which you are using the Slush Services (the “**Customer Organization**”). We may collect User Data from our Users in a variety of ways, including when Users register to the Slush Services or subscribe to a newsletter. Further, please note that we also collect details of any transactions and payments you carry out through the Slush Services.

The following User Data received from the Users in connection with the registration to the Slush Services is necessary in order to use the Slush Services:

- First name
- Last name
- Email
- Password
- Marketing opt-in or opt-out

We may also collect and process the following User Data in connection with your registration to or use of the Slush Services:

- Picture
- Information regarding interests, employer, education, professional background and/or other information the User chooses to provide in connection with his/her public profile on the matchmaking platform

- Information the User chooses to provide to other Users in the chat function available on the matchmaking platform such as contact details
- Information relating to transactions and payments carried out through the Slush Services
- Type of Event ticket purchased on the Slush Services
- Domicile or location
- Customer feedback and other information the User provides to us in correspondence.

In addition to the above, we may also collect User Data from our Customer Organizations when they purchase Event tickets on the Slush Services. The User Data we collect from the Customer Organizations include:

- the email address connected to the user account of the User to whom the Customer Organization addresses the ticket purchased by it
- the Customer Organization the User represents

### Technical Data

Although we do not normally use Technical Data to identify you as an individual, you can sometimes be recognized from it, either alone or when combined or linked with User Data. In such situations, Technical Data can also be considered personal data under applicable laws and we will treat such data as personal data.

We and/or our authorized third party service providers, may automatically collect the following Technical Data when you visit or interact with the Slush Services:

- Browser type and version
- Device and device identification number
- Time spent at the Slush Services
- Interaction with the Slush Services
- URL of the website you visited before and after visiting the Slush Services
- The time and date of your visits to the Slush Services
- IP address
- 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 Slush Services, including cookies.

Cookies are small text files sent and saved on your device that allows us to identify visitors of the Slush Services and facilitate the use of the Slush Services and to create aggregate information of the Users. This helps us to improve the Slush Services and better serve our Users. We also use cookies that make the use of the Slush Services easier for you, for example by remembering usernames, passwords and (language) preferences. We also use tracking and analytics cookies to see how well our services are being received by our Users.

The cookies will not harm your device or files. We use cookies to tailor the Slush Services and the information we provide in accordance with the individual interests of our Users.

The Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

[Safari](#)

[Google Chrome](#)

[Internet Explorer](#)

[Mozilla Firefox](#)

Please note that some parts of the Services may not function properly if use of cookies is refused.

## Web analytics services

The Slush Services use Google Analytics and other web analytics services to compile Technical Data and reports on visitor usage and to help us improve the Slush Services. For an overview of Google Analytics, please visit [Google Analytics](#). It is possible to opt-out of Google Analytics with the following browser add-on tool: [Google Analytics opt-out add-on](#).

### **3. PURPOSES AND LEGITIMATE GROUNDS FOR PROCESSING OF PERSONAL DATA**

#### **Purposes**

There are several purposes for the processing of your personal data by Slush:

*To provide and develop the Slush Services and to carry out our contractual obligations*

Slush processes your personal data in the first place to be able to provide the Slush Services to you under the contract between you and Slush or between Customer Organization and Slush.

We use the data for example to handle your payments and to provide the other Users with the information necessary for the proper use of the matchmaking platform. If you contact our customer service, we will use the information provided by you to answer your questions or solve possible issues.

*For customer communication and marketing*

We process personal data for the purpose of maintaining our customer relationships with the Users and the Customer Organizations, for instance by contacting you regarding the Slush Services and to inform you of changes to the Slush Services. We use personal data for marketing and advertising the services and products provided by us, e.g. to customize the User's experience by providing the User with targeted offers and advertising information based on the information gathered from the User during his/her previous visits to the Slush Services.

*For our legal obligations*

Slush processes data to enable us to administer and fulfil our obligations under law. This includes data processed for complying with our bookkeeping obligations and providing information to relevant authorities such as tax authorities.

*For claims handling and legal processes*

Slush may process personal data in relation to claims handling, debt collection and legal processes. Slush may also process data for the prevention of fraud, misuse of our services and for data, system and network security.

*For quality improvement and trend analysis*

We may also process information about your use of the Slush Services to improve the quality of the Slush Services e.g. by analyzing any trends in the use of the Slush Services. When possible, we will do this using only aggregated, non-personally identifiable data.

#### **Legitimate grounds for processing**

We process personal data to perform our contractual obligations towards the Users.

Further, we process personal data based on our legitimate interest to run, maintain, and develop our business and to create customer relationships. We also process personal data based on our legitimate interest whilst fulfilling our contractual obligations towards our Customer Organizations. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy and e.g. provide you with easy to use opt-out from our marketing communications and data transfers to Customer Organizations. We also use pseudonymized or non-personally identifiable data when possible.

The Users may be requested to grant their consent for the processing of personal data. Such consent request may take place in some parts of the Slush Services. In these events, Users may withdraw their consent at any time.

#### **4. TRANSFERS TO COUNTRIES OUTSIDE EUROPEAN ECONOMIC AREA**

Slush stores the Users' personal data primarily within the European Economic Area. However, we have service providers in several geographical locations. As such, we, and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which it is processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area 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 address mentioned in this Privacy Statement.

#### **5. RECIPIENTS**

We only share personal data within our organization if and as far as reasonably necessary for the purposes of this Privacy Statement, e.g. with our employees responsible for customer service and marketing. We do not share personal data with third parties outside of our organization unless one of the following circumstances applies:

*It is necessary for the purposes of this Privacy Statement*

To the extent that third parties (such as other Users of the Slush Services) need access to your personal data in order for us to perform the Slush Services, Slush 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. Furthermore, we may provide your personal data to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in accordance with our Privacy Statement and any other appropriate obligations of confidentiality and security measures.

*For legal reasons*

We may share 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, security or technical issues; and/or (iii) protect the interests, properties or safety of Slush, the Users or the public in accordance with the law. When possible, we will inform the Users about such transfer and processing.

*To authorized service providers*

We may share personal data to authorized service providers who perform services for us (including data storage, accounting, payment, sales and marketing service providers). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Statement.

Please note that we use the online advertising product Facebook Custom Audiences (Facebook Inc. 1601 S. California Avenue, Palo Alto, CA, 94304 ("**Facebook**")) to target you with advertising relating to our services and products. It is possible to opt-out of such targeted advertising through your Facebook profile settings.

*With explicit consent*

We may share your personal data with third parties outside Slush for other reasons than the ones mentioned before, when we have your explicit consent to do so. The User has the right to withdraw the above mentioned consents at all times.

#### **6. STORAGE PERIOD**

Slush does not store your personal data longer than is legally permitted and necessary for the purposes of this Privacy Statement. The storage period depends on the nature of the information and on the purposes of processing. The maximum period may therefore vary per use.

Most personal data relating to a User's user account with the Slush Services will be deleted after a period of one (1) year has lapsed after Slush has deleted the user account in question. Thereafter, a part of the personal data relating to a User's user account with the Slush Services may be stored 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. All personal data relating to a User's user account with the Slush Services will be anonymized or deleted within a period of ten (10) years after the User has deleted its user account with the Slush Services, with the exception of personal data required in certain rare situations such as legal proceedings.

We will store Technical Data of unregistered Users for a reasonable period, but not longer than five (5) years for the purposes specified in this Privacy Statement.

## **7. USERS' RIGHTS**

### *Right to access*

The Users have the right to access the personal data relating to them and processed by us. We give you the possibility to view certain data through your user account with the Slush Services or request a copy of your personal data.

### *Right to withdraw consent*

In case the processing is based on a consent granted by the User, the User 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*

The Users have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored about the User corrected or completed by contacting us. You can correct or update some of your personal data through your user account in the Slush Services.

### *Right to deletion*

The Users may also ask us to delete the Users' personal data from our systems. We will comply with such request unless we have a legitimate ground not to delete the data. Such legitimate ground may be based on e.g. applicable legislation.

### *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 performance of the Slush Services or for compliance with a legal obligation. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the Slush Services.

### *Right to restriction of processing*

You may request us to restrict 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. This may however lead to fewer possibilities to use the Slush Services.

### *Right to data portability*

The Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

### *How to use the rights*

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

## **8. DIRECT MARKETING**

The User has the right to prohibit us from using the User's 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.

## **9. LODGING A COMPLAINT**

The User can lodge a complaint with the local supervisory authority for data protection, in case the User considers the Company's processing of personal data to be inconsistent with the applicable data protection laws. In Finland, the local supervisory authority is the Data Protection Ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)).

## **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.

Should despite of the security measures, a security breach occur that is likely to have negative effects to the privacy of the Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.

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