

SLUSH PRIVACY POLICY

Slush Oy (“**Slush**”, “**we**”) provides the websites slush.org and platform.slush.org as well as the online registration, ticket shop, side event tool, volunteer tool and matchmaking tool available through the above mentioned websites (the websites, online registration, ticket shop, side event tool, volunteer tool and matchmaking tool 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 Policy explains what personal data we process, how we process it and how you may use your rights as a data subject (e.g. right to object, right of access).

This Privacy Policy may be updated from time to time. You can find the current version on the slush.org and platform.slush.org websites. This Privacy Policy only covers data processing carried out by Slush as a controller. However, it should be noted that Slush Platform may be licensed to a third party and in these cases Slush may act as a processor or an independent controller together with the third party.

In this Privacy Policy, the startup and technology events organized by Slush and/or under Slush brand, 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: Malminkatu 16, 00100 Helsinki
 Email: hello@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 (including cookies and web analytics). Both data categories are explained in more detail below.

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, create a profile or subscribe to a newsletter. Further, please note that we also collect details of transactions, such as ticket purchases, 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 address;
- Password; and
- Marketing opt-in or opt-out.

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

Matchmaking tool

- Picture, domicile, job title, organization, phone number;
- 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 tool;
- Information about User’s activities within the tool, such as information related to User’s meetings;
- Information the User chooses to provide to other Users in the chat function available on the matchmaking tool; and

- Angel investor information: first name, last name, domicile, phone number, job title, organization, investment information (such as previous investments, industries, investments in hardware/software startups, social and environmental impact of the investments, range of typical investment, turnover stage and primary investment regions).

Ticket shop

- Name;
- Email address;
- Information relating to transactions and payments carried out through the Slush Services;
- Type of Event ticket purchased on the Slush Services;
- Organization and Job Title; and
- Address, Postal Code, Domicile or Location.

Side event tool

- Name;
- Email address;
- Job title;
- Organization; and
- Other event specific information that might be requested via registration form (such as motivational information).

Volunteer registration

- Name;
- Date of birth;
- Sex (optional);
- Information regarding education, skills, work experience, previous volunteering or other information the User chooses to provide in connection with his/her public profile; and
- Information regarding future recruiting interests.

Marketing

- Name;
- Email address;
- Event attendance information;
- Interests of the User;
- User account and profile information; and
- Information provided via matchmaking tool (please see the matchmaking tool section above).

Other

- Customer feedback and other information the User provides to us in correspondence.

In addition, 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; and
- 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 (e.g. in certain technical support cases) be recognized from it, either alone or when combined or linked with User Data. In these 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; and
- 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. They allow us to identify visitors of the Slush Services and facilitate the use of the Slush Services as well as to create aggregate information of the Users. Cookies help us to improve the Slush Services and better serve our Users. We use cookies to 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 the Users.

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. However, Users should be aware that some parts of the Services may not function properly if use of cookies is, in part or in whole, refused. Please see the following list of links each of which provide you information on how to adjust cookie settings on certain popular browsers:

- [Safari](#)
- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)

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

Slush processes personal data of the Users of its services for the purposes described in this Privacy Policy. These processing purposes, of which one or more may apply depending on the case at hand, are listed below:

- *To organize Events and provide Slush Services*

Slush processes your personal data to be able to organize Events and 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 online registration, ticket(s) and payments, to enable organization of side events and to provide you and the other Users with the information necessary for the proper use of the Matchmaking tool as well as other tools of the Slush Platform. We may also process personal data to contact you regarding the Events and Slush Services as well as to inform you of changes to the same. In the event you contact our customer service, we will use the provided information to answer

your questions or solve possible issues. The legitimate grounds for processing is the performance of a contract.

➤ *To provide personalized content and customized user experience*

If you have selected to use our matchmaking tool, we process personal data to generate an optimal and customized user experience and to provide you with the most relevant content based on your user profile. This may, for example, include individualizing your matchmaking tool feed and providing you with customized recommendations. However, you may at any time decide to turn the matchmaking tool feature off and remove your profile. After removing the profile Slush no longer processes the user profile information for the abovementioned purposes. The legitimate grounds for processing is the performance of a contract.

➤ *For customer communication, marketing and development*

We process personal data for the purpose of maintaining our customer relationships as well as for marketing and advertising Slush Services and other products provided by us or via our Slush Platform. This means, for example, customizing the user experience by providing the User with targeted offers, side event information, employment opportunities and advertisements based on the information gathered from the User during his/her visits to the Slush Services. We process personal data also to run, maintain and develop our business and to create new customer relationships. The legitimate grounds for processing is the legitimate interests of Slush.

➤ *Electronic direct marketing*

When it comes to electronic direct marketing, the legitimate grounds for processing personal data is the legitimate interest of Slush. However, to be allowed to send electronic direct marketing (for example, utilizing email or text messages) a consent of the receiver of electronic direct marketing is collected (opt-in) where required by applicable laws. Such consent request may take place in certain parts of Slush Services. When the consent is given, the Users may withdraw given consent (opt-out) at any time by contacting us via email (see section 1 above) or by managing consent settings via their user account.

➤ *To fulfil our legal obligations*

Slush processes data to be able to administer and fulfil its obligations under law. This includes data processed for complying with our bookkeeping obligations and providing information to relevant authorities such as tax authorities. Personal data may also be disclosed due to mandatory grounds arising from the law or regulations or, if enquired, to the court or competent authority for legal and justified grounds. The legitimate grounds for processing is to comply with legal obligations.

➤ *For potential 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. In these situations, the legitimate grounds for processing is the legitimate interests of Slush.

➤ *For quality improvement, trend analysis and research*

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. Further, we may process the information you provide us via Slush Platform for research purposes (e.g. compile a publication on the State of European Tech or equal). We will do this using only aggregated, non-personally identifiable data. The legitimate grounds for processing is the legitimate interests of Slush.

When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy. We also use pseudonymized or non-personally identifiable data when possible.

4. TRANSFERS TO COUNTRIES OUTSIDE EUROPEAN ECONOMIC AREA

We always take necessary steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which it is stored and 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.

Currently we store the Users' personal data primarily in the United States of America, as it is the domicile of our service providers. However, Slush has service providers in certain other geographical locations too. As such, we and our service providers may transfer personal data to, or access in it, jurisdictions outside the European Economic Area or the User's domicile.

More information regarding the transfers of personal data may be obtained by contacting us on the address mentioned above in section 1 of this Privacy Policy.

5. RECIPIENTS

We only share personal data within our organization, if and as far as reasonably necessary, for the purposes of this Privacy Policy, 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 Policy*

To the extent third parties (such as other Users of the Slush Services, side event organizers as well as other collaborators/event organizers) 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 Policy and in accordance with all applicable laws and regulations. Furthermore, we may provide your personal data to our affiliates, other trusted businesses or persons to process it on behalf of us, based on our instructions and in accordance with our Privacy Policy as well as 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 data transfer and processing.

➤ *To authorized service providers*

We may share personal data to authorized service providers who perform services for us (including but not limited to 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 Policy.

Please note that we use, for example, the services of Stripe Payments Europe, Ltd (company number: 513174, C/O A&L Goodbody, Ifsc, North Wall Quay, Dublin 1, Ireland "**Stripe**") to manage and provide the ticket shop feature of the Platform. We use also an 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 above, when we have your explicit consent to do so. The User has the right to withdraw the aforementioned consent(s) at all times.

6. INFORMATION SECURITY

We use administrative, organizational, technical and physical safeguards to protect the personal data we collect and process. Measures include, for example and 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.

7. STORAGE PERIOD

Slush does not store your personal data longer than is legally permitted and necessary for the purposes of this Privacy Policy. The storage period depends on the nature of the information and on the purposes of processing. The maximum storage 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 five (5) years from the last use of the user account in question. Slush will inform you on the oncoming deletion. Thereafter, a part of the personal data relating to a User's user account with the Slush Services may be stored in case 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 after a period of ten (10) years from last use of the user account, 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 two (2) years for the purposes specified in this Privacy Policy.

8. 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 object*

If the data is processed based on our legitimate interest, you may have the right to object to certain use of your personal data. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the Slush Services.

➤ *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 erasure*

The Users may also request us to delete their own 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 data portability*

In certain situations you may have the right to receive your personal data from us in a structured and commonly used format and to independently transmit the data in question to a third party.

➤ *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 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. However, this may lead to fewer possibilities to use the Slush Services.

The abovementioned rights may be exercised by sending a letter or an email to us on the addresses set out above in section 1. The message should include the following information: full name, home address, email address and telephone 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.

9. 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 address indicated above in section 1 or by using the unsubscribe function offered in connection with each direct marketing message.

10. 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). The contact details of the supervising authority are as follows:

Office of the Data Protection Ombudsman

Visiting address: Ratapihantie 9 (6th floor), 00520 Helsinki

Postal address: P.O. Box 800, 00521 Helsinki, Finland

Email: tietosuoja@om.fi

Telephone: +358 (0)2956 66700 (switchboard)

Telephone guidance: +358 (0)2956 66777