# CleanTechforCEE privacy policy

By getting involved in our activities (e.g. applying to one of our programs, signing up to our newsletter, filling forms on our website, taking part in our events, contacting us on matters related to the functioning of the website using the available contact methods), you provide us with your personal data.

Our privacy policy explains how we gather your data, who and why processes it and what are your rights in that matter. Please, find the key information that will allow you to understand how it works.

# What data do we process?

We process data that you provide us, when using the forms on our website or recruitment platform, when you register for an event or when you start cooperating with us within our activities. The data is indispensable to execute the program, provide you with the latest news through our newsletter, organise the event or respond to your inquiries depending on the purpose of data's gathering. The scope of data we process differs depending on the purpose – when you register for an event you provide us with your name, surname, email address and phone number, but when you apply to the program you inform us also about your professional experience and education. When you sign up for our newsletter, you provide us with your e-mail. When you send us your inquiry, we gather your contact data and all the personal data you included in the correspondence.On the other hand, if we intend to enter into a contract with you in connection with an initiative we promote, we will process your identification and contact information.Regarding the analysis of the website's functionality, we may collect data related to your activity on the site.

#### Who is the data controller?

We – the Foundation for Technology Entrepreneurship, are your data controller. We are established in Warsaw, Poland at FOCUS, al. Armii Ludowej 26, 00-609 Warsaw. You can contact us by email: gdpr-rodo@fpt.org.pl or info@fpt.org.pl.

Furthermore, according to current regulations, other entities might be considered the data controller including our trusted partners (organisations with which we cooperate).

#### Who are the data recipients?

We will use due diligence in the selection of entities to which we will transfer your data and in the case of such selected entities we will require that they protect your

data by appropriate technical and organizational measures. Your personal data may only be disclosed:

- to third parties providing services to us that are needed to achieve the purposes in relation to which we process your data (e.g. IT services, electronic communication, hosting, marketing, administration),
- to recipients to whom the disclosure is required by applicable law or order of a court or other authority,
- to other recipients, if you give us your consent to disclose data to them or if the transfer of data to them is necessary to protect your vital interests or vital interests of other individuals or for the common good,
- to recipients included in the circle of entities with whom we conduct networking activities as part of our initiative, for which you have provided us with your data (potential investors, business advisors, etc.),
- to recipients who support us in the implementation of our initiative that you have joined, such as our grantors, providers of training, webinars and other similar activities, our subcontractors, institutions that cooperate with us for the implementation of our initiative.

# What are the purposes and legal basis for the data processing?

Purpose	Legal basis
Providing response to inquiries sent via email or online forms, available on the website	Article 6.1.f) – legitimate interest as a personal data controller
Event organisation for startup and innovation ecosystem	Article 6.1.a) – consent – if we are just going to establish a business relationship Article 6.1.f) – legitimate interest as a personal data controller – if we have an existing business relationship with you
Informational campaigns, in particular sending out newsletters, event invitations and updates about the startup ecosystem, our programs and multiple initiatives.	Article 6.1.a) – consent- if we are just going to establish a business relationship Article 6.1.f) – legitimate interest as a personal data controller – if we have an existing business relationship with you
Contracts with partners and partner organisations	Article 6.1.b) – contract provisions

Execution of orders placed via the website	Article 6.1.b) – contract provisions
Defence against claims, before courts and administrative authorities and outside them	Article 6.1.f) – legitimate interest as a personal data controller
Analyzing the use of the website, as well as to improve its functioning and security	Article 6.1.f) – legitimate interest as a personal data controller

# Is it obligatory to provide data?

Provision of data is voluntary, however, failure to provide data for one or more processing purposes will prevent us from carrying out the processing.

Is it possible to withdraw a consent?

If the processing is carried out on a consent basis, you have the right to withdraw your consent at any time – this will not influence the legal compliance of the processing conducted prior to the consent withdrawal.

## Will we send your data outside the EEA?

Your data might be, only in certain cases, sent to entities from third countries – countries located outside the European Economic Area (EEA). Whenever your personal data is transferred outside the EEA or to countries that do not provide the same or an adequate level of protection for personal data, we will ensure that this is done on the basis of a valid legal basis and using the safeguards required by law. What are your legal rights towards your data?

Any time you can exercise your:

- right to access your data: you have the right to request us for copies of your personal data that we has collected. At your request, a copy of your personal data that is subject to processing will be presented to you free of charge. For sending each subsequent copy of data we have the right to request a fee that will cover the reasonable costs of handling such a request.
- right of rectification of personal data: we take reasonable steps to ensure that your personal data is correct, complete and up to date. If it is necessary to change this data, please let us know.
- right to withdraw the consent: you have the right to withdraw this consent on the conditions indicated above.
- right to delete data and to limit processing of personal data: in the cases indicated in the provisions of law on the protection of personal data, you have the right to request the deletion of your personal data. However, this right is not absolute – there may be occasions when we are still entitled to process

- your personal data. You can also request a restriction on the further processing of your data.
- right of restriction or objection of processing of personal data: you have the right to restrict or object to the data controller's processing of your personal data, under certain conditions.
- right to object to processing: in the cases indicated in the provisions of law, you have the right to object to the further processing of your data when the legal basis for the processing of personal data is our legitimate interest.
- right to data portability: you have the right to request that we transfer the personal data that it has collected to another organization, or directly to you, under certain conditions.

If you wish to exercise your rights, please contact us at the gdpr-rodo@fpt.org.pl or info@fpt.org.pl.

## Can you lodge a complaint?

Any time you have the right to lodge a complaint with a supervisory authority (President of the Office for Personal Data Protection – in polish: *Prezes Urzędu Ochrony Danych Osobowych*).

## How long do we process personal data?

Your personal data will be processed:

- to contact you from the day they were collected and as long as we are holding the conversation in the matter in which you made contact,
- for marketing purposes for the duration of our legitimate interest, i.e. the duration of the relationship that connects us or until consent is withdrawn, if it was given to us and if the processing is based on the consent,
- for the purposes of pursuing and defending against claims for a period not exceeding the limitation period for claims,
- for the purpose of improving the functioning and security of the website www.cleantechforcee.com – for the time for which these data is necessary to achieve this purpose, but no longer than until you express an effective objection to their processing,
- for the purpose of sending newsletters from the date of signing up until you effectively object to the processing (unsubscribing from the newsletter),

# Will your data be processed in an automated way?

Your data may be processed in an automated way through analytics tools like Google Analytics to help us improve our services and user experience, but this information will not be used for individual profiling or to make automated decisions about you personally.

#### Links to third party-websites

The website also includes links to third-party websites. When you visit these pages different rules apply than those described here in the field of personal data processing, as well as someone else is the data controller of data processed there. We recommend that you read the rules applicable to the processing of personal data published by the administrators of these websites.

## Social media plug-ins

On our website we have included social media plugins (LinkedIn). Activating the buttons establishes a direct connection to the server of the respective social network which may gather data from your device.

Please note that we do not have influence on the scope of data gathered by the social networks through their plug-ins. More details of the purpose and scope of the data gathered and how the respective social networks process and use this data as well as details of your rights and the relevant setting options to protect your privacy can be found on the following websites:

LinkedIn Corporation, USA: https://www.linkedin.com/legal/privacy-policy? I=pl PL.

#### Cookies

Our website uses cookies. Cookies are small text files stored on your device that are used to collect information about your activity on our website.

#### What cookies we can use?

- Necessary cookies: These cookies are essential for the proper functioning of the website.
- Analytical cookies: These cookies help us understand how users interact with our website, allowing us to improve it.
- Functional cookies: These cookies enable us to remember your preferences (e.g., language) and provide a more personalized experience.
- Marketing cookies: These cookies are used to track users across websites to display ads that are more relevant to them.

#### How to manage cookies?

You can manage cookie settings directly in your web browser. Most browsers allow you to control cookies through their settings. You can delete all cookies already on your device and set your browser to block their installation. Additionally, if the functionality of our website allows, our cookie banner will enable you to opt in or out of individual cookie categories.

If you have any questions regarding our cookie policy, please contact us using the contact information provided at the top of the document.