

# PRIVACY POLICY

***By using this Platform, you hereby acknowledge that you have read and agreed to both the Terms & Conditions and the following Privacy Policy:***

The following provisions of Startup Macedonia's Privacy Policy shall govern the manner of use of personal data of the User, Users remedies pursuant to the General Data Protection Regulation (GDPR), procedure in the events of data breaches etc.

This Privacy Policy may use the same terms as defined and explained in Startup Macedonia's Terms & Conditions. The User is hereby counseled to carefully read the Terms & Conditions first, and then scrutinize this document.

## § Definitions

- 1. Personal data.** *“Personal data”* shall mean any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic cultural or social identity of that natural person.
- 2. Data.** *“Data”* for the purposes of this Privacy Policy shall mean all data not defined as Personal data.
- 3. Processing.** *“Processing”* shall mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 4. Controller.** *“Controller”* shall mean the natural or legal entity, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Macedonian applicable law(s) and the General Data Protection Regulation (“GDPR”).
- 5. Processor.** *“Processor”* shall mean a natural or legal entity, public authority, agency or other body which processes personal data on behalf of the controller.
- 6. Consent.** *“Consent”* of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal data relating to him, her or it.
- 7. Personal data breach.** *“Personal data breach”* shall mean a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- 8. Supervisory authority.** *“Supervisory authority”* shall mean an independent public authority which is established by the Macedonian government or where applicable any

Member State of the European Union or third country which provides adequate protection of the right of the data subject with regards to personal data.

## **§ Consent**

User(s) hereby agree that with the registration on the Platform i.e. the entry of their respective email address, legal entity name, date of incorporation, Tax No, whether or not they have revenue and/or have made profit, development stage, industry field, logo etc. they (the User(s)) freely give their consent to Startup Macedonia for the processing of data & personal data relating to said User.

With the registration on the Platform and entry of data & personal data Users hereby agree to the Terms & Conditions of the Platform and the Privacy Policy.

***Notice: While Startup Macedonia does not specifically request any type of personal data as the Platform pertains to businesses, it does however offer field wherein User(s) e.g. instead of submitting the number of founders of a certain company, the User(s) may wish to add their names & surnames. In such instances Startup Macedonia will apply Personal Data standards to such information. The aforementioned extend in cases where User(s) enter personal emails on the Platform.***

Users also consent to giving appropriate information required by Startup Macedonia and the Platform for the successful rendering of Startup Macedonia's services as follows:

- Development stage;
- Industry field;
- Revenue Model;
- Target Market;
- Yearly Growth;
- Funding type;
- Company address;
- No. of employees;

Users hereby acknowledge that every field on the Platform for the insertion of information is not required, and certain information may be omitted by the User where applicable, meaning that fields and forms not specifically or otherwise marked and defined as required may at the Users' sole discretion and detriment be left blank.

User(s) explicitly consent to the collection and use of data & personal data for the specific reason of providing the services of Startup Macedonia and the Platform i.e. matchmaking services between startups and organizations etc.

## **§ Withdrawal of Consent**

Users are free to withdraw consent at any time and for any reason. Withdrawal of consent and all ramifications thereof shall be addressed by the User to the contact address given in the Contact Section of this Privacy Policy.

### **§ Use of information i.e. personal data and other information**

Personal data and other information pertaining to a specific User, described in greater detail in Section Consent of this Privacy Policy, shall be used for the specific reason of providing services that consist of, but are not limited to, the successful matching of User(s) on both sides of the startup spectrum, meaning Startups & Organizations, the building of profiles on which basis the matching of User(s) shall be completed etc.

User(s) hereby agree that Data made publicly available by the User(s), competent government bodies, supervisory bodies etc. that pertain to the User(s) may be used for periodicals, brochures, published research projects, marketing etc.

Personal data shall be used by Startup Macedonia shall be omitted from cases subject to the previous paragraph.

### **§ Breach Notification**

In the event of a Personal data breach, Startup Macedonia i.e. the controller shall without undue delay, and where feasible no later than 72 hours after becoming aware of the Personal data breach, notify said breach to the supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of the User. Should the notification to the supervisory authority not be made within 72 hours, it shall be accompanied by reason for the delay.

Should the Personal data breach be likely to result in a high risk to the rights and freedoms of the data subject, the controller i.e. Startup Macedonia shall communicate the Personal data breach to the subject without undue delay. The aforementioned communication to the data subject shall describe, in a clear and plain language, the nature of the Personal data breach and shall consist of the following:

- The name and contact details of the Data Protection Officer or other contact point where more information can be obtained;
- The likely consequences of the Personal data breach;
- The measures undertaken or proposed to be taken by Startup Macedonia to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effect;

User(s) acknowledge that should events arise pursuant to Article 24 Section (3) of the General Data Protection Regulation they may not be informed of the Personal data breach as defined in the previous paragraph.

***Notice: Data about your legal entity is not defined as Personal data and Startup Macedonia shall inform You of data breaches at its own discretion.***

## **§ Right of Access**

User(s) have the right to obtain from Startup Macedonia confirmation as to whether or not Personal data concerning the User is being processed, the purposes of processing, the categories of personal data concerned, the recipients or categories of recipients to whom personal data have been or will be disclosed, the envisaged period for which the personal data will be stored or if not possible the criteria used to determine that period, the existence of the right of rectification or erasure of personal data, the right to lodge a complaint to a supervisory body, source of the data if said data is not collected from the User and the existence of automated decision-making, including profiling.

Furthermore, User(s) shall be provided a copy of their personal data, free of charge, in an electronic format.

***Notice: Data about your legal entity is not defined as Personal data. Furthermore, Data about your legal entity is made publicly available by You – the User(s), competent government bodies, supervisory bodies etc. As such, you waive the Right of Access in all instances where Personal data is not concerned.***

## **§ Right to be Forgotten**

Users shall have the right to obtain from Startup Macedonia the erasure of personal data concerning the User, without undue delay. Startup Macedonia shall have the obligation to erase the personal information regarding the then User now data subject should one of the following apply:

- The Personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The Data Subject withdraws consent on which the processing is based;
- The Personal data have to be erased for compliance with a legal obligation;

***Notice: Data about your legal entity is not defined as Personal data. Furthermore, Data about your legal entity is made publicly available by You – the User(s), competent government bodies, supervisory bodies etc. As such, you waive the Right to be Forgotten in all instances where Personal data is not concerned.***

## **§ Data Portability**

User(s) shall have the right to receive Personal data concerning them, which they provided to Startup Macedonia, in a structured, commonly used and machine-readable format. User(s) shall have the right to transmit those data to another controller without hindrance from Startup Macedonia.

***Notice: Data about your legal entity is not defined as Personal data. Furthermore, Data about your legal entity is made publicly available by You – the User(s), competent government bodies, supervisory bodies etc. As such, you waive the Right of Data Portability in all instances where Personal data is not concerned.***

## **§ Privacy by Design**

Startup Macedonia implements appropriate technical and organizational measures for ensuring, by default, only personal data which are necessary for the specific purpose of processing are processed.

Startup Macedonia processes and retains only the personal data absolutely necessary for the rendering of the services of the Platform.

Startup Macedonia has implemented data-protection principles, such as data minimization, and integrated the necessary safeguards into the processing in order to meet the requirements as stipulated by the governing law and the General Data Protection Regulation and to protect the rights of the data subjects.

## **§ Disclosure of Personal Data**

Startup Macedonia shall not disclose personal data of the data subject to any third parties.

Notwithstanding, the previous statement Startup Macedonia shall where applicable and necessary under applicable law(s) disclose personal data to competent authorities and governing bodies.

***Notice: Data about your legal entity is not defined as Personal data. Furthermore, Data about your legal entity is made publicly available by You – the User(s), competent government bodies, supervisory bodies etc. As such, disclosure of Data shall be used at Startup Macedonia's own discretion where applicable.***

## **§ Data Storage**

Personal data shall be stored on a virtual private cloud in a private subnet (Amazon Web Services), secured by login credentials and encryption at rest. Access to this database cannot be publicly accessed meaning that access can be granted only with the use of a Startup Macedonia's private certificate.

Personal data is stored using several layers of encryption in a segmented network with no public internet access. New encryption keys are generated daily and existing keys are rotated on a regular basis.

***Notice: Data Storage applies both to Personal data & Data as defined in the Definitions Section of this Privacy Policy.***

## § Security

The personal data and other information given by the User to Startup Macedonia is encrypted using secure socket layer technology (SSL) and stored with industry-standard encryption.

User(s) acknowledge that no method of transmission of personal data and other information over the internet or electronic storage is 100 percent secure.

Startup Macedonia shall strive to uphold industry standards of encryption, electronic storage and transmission over the internet and shall when needed improve upon the security of the User(s) personal data.

***Notice: Security applies both to Personal data & Data as defined in the Definitions Section of this Privacy Policy.***

## § Cookies and use of third party products

User(s) hereby agree that that the use of Cookies for one of or all of the following is necessary in order for Startup Macedonia to render services to its User(s): authentication, security, advertising, performance, analytics and research.

Startup Macedonia hereby acknowledges that the use of Google Analytics is incorporated to the extent of measuring how the Platform is used by the User(s) and other visitors and to generate reports for Startup Macedonia's internal use. Google Analytics does not collect any personally identifiable information about the User(S).

## § Changes to this Privacy Policy

Startup Macedonia retains the right to alter, change, revise or institute an entirely new Privacy Policy on its own discretion at any time Startup Macedonia deems fit to do so. Users shall be notified of changes to this Privacy Policy via the email they have submitted upon registering their respective profile.

## § Details

***Association of the startup community in the Republic of North Macedonia STARTUP MACEDONIA Skopje***, an association of citizens i.e. non-profit organization, registered under the jurisdiction of the Republic of North Macedonia.

***Address: St. Metodija Shatorov –Sharlo No. 30/1-36 Skopje – Aerodrom***

***Contact email: [startupmacedonia.platform@gmail.com](mailto:startupmacedonia.platform@gmail.com)***