

START-UP NATION CENTRAL PRIVACY POLICY (GDPR)

Last Updated: November 2019

This privacy policy (“**Privacy Policy**”) governs how we, Start-Up Nation Central Ltd. (CC) (“**Start-Up Nation Central**”, “**SNC**”, or “**we**”, “**our**” or “**us**”) use, collect and store information pertaining to you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you visit and make use of our website <https://www.startupnationcentral.org/> and <https://finder.startupnationcentral.org/> and all its subdomains(“**Website(s)**”);
- (ii) When you register or sign up on our Website;
- (iii) When you contact us or fill in any other form on our Website (including when you request a visit with SNC); or
- (iv) When you request introductions through Finder.

Please note that some of these use cases only apply to certain subdomains of our Website.

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “**Personal Data**” means any information that can be used, alone or together with other data, to uniquely identify any living human being.

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This Privacy Policy may be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your personal data	Period of storage	Consequences of not providing the data
When you visit and make use of our Website					
<ul style="list-style-type: none">• IP address• Referral URLs	To: <ul style="list-style-type: none">• create reports on the innovation industry• improve our products, including the usability of our Website	Legitimate interest (i.e. to provide relevant information to visitors and improve our Website)	<ul style="list-style-type: none">• Third party applications (such as Google Analytics, Intercom, Fullstory, Marketo).• Hosting companies (such as Google)• SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes).	For as long as we have a legitimate business need for using the information.	No consequences. However, please note that you may not receive content suggestions.
Cookies					
When you register or sign up on our Website					
<ul style="list-style-type: none">• First name• Last name• Gender• Email address• Additional Email address• Position• Company Name• Phone Number• LinkedIn details• Headline (taken from LinkedIn)• Google Details• Picture (taken from LinkedIn and Google)• Total time on the Website• Average session length• Average events per session• Location (City, State/Region, Country, IP address)• Device type• Browser• Operating System• Referral URLs• User journey• Any other data you decide to provide	To: <ul style="list-style-type: none">• Send informational emails (i.e. future informational, event-related or other Site-related emails from us, which may include events or information from third parties (“Informational Emails”)).• Identify potential partners	<ul style="list-style-type: none">• Consent (even if you agree to receive Informational Emails, you always have the option to opt-out from receiving such Informational Emails by selecting an unsubscribe link at the bottom of each email that is sent• Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.• Legitimate interest (such as identifying potential partners or contacting you after you have shown interest in a company or a field)	<ul style="list-style-type: none">• Third party applications (such as Google Analytics, Intercom, Fullstory, Marketo).• Hosting companies (such as Google)• SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes).	Until you withdraw consent (or unsubscribe) or we proactively delete the data.	We cannot send you, and you cannot receive, Informational Emails. We cannot identify potential partners.

When you contact us or fill in any other form on our Website (including requests for visits with SNC)					
<ul style="list-style-type: none"> • First name • Last name • Email address and contact details • Organization name • Job title • Country • Information related to your company or institution • Any other data you decide to provide in the context of your query 	To: <ul style="list-style-type: none"> • respond to your question or query • Organize a visit to the extent appropriate • B2B marketing purposes 	<ul style="list-style-type: none"> • Legitimate interest (e.g. to respond to your query/request) • Regarding B2B marketing, we rely on Recital 47 of the GDPR and legitimate interest. In this situation, we offer an unsubscribe capability. 	<ul style="list-style-type: none"> • Third party applications (such as Google Analytics, Intercom, Fullstory, Marketo). • Hosting companies (such as Google) • SNC's consultants (such as for R&D purposes, digital marketing purposes and SEO purposes). 	Depending on the context, we keep it until you request your data to be deleted or we proactively delete the data.	We cannot respond to your query or request. We cannot consider you for a visit with SNC. We cannot send you marketing communications.
When you request an introduction through Finder					
<ul style="list-style-type: none"> • Name • Email address • Contact details • Message • Attachments • Information you provide in connection with the introduction request • If you are sending information about third parties you represent and warrant that you have all required consents and the right to send the information 	To make introductions to companies that you have approved	<ul style="list-style-type: none"> • Legitimate interest (e.g. to process your request) 	<ul style="list-style-type: none"> • Hosting companies (such as Google) • Companies that you have approved 	Depending on the context, we keep it until you request your data to be deleted or we proactively delete the data.	Cannot process your introduction request

2. HOW WE PROTECT AND STORE YOUR INFORMATION

- I. Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. Nevertheless, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- II. Retention of your Personal Data. In addition to the retention periods mentioned in Section 1 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data in connection with the foregoing events;
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality);
- With related parties to advance the mission of SNC.

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION

- With respect to the access from Israel, please note that Israel was declared as a country offering adequate level of data protection by the European Commission. Please read more here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en;
- Where we transfer your Personal Data outside of the EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States;
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

5. YOUR RIGHTS

The following rights (which may be subject to certain exemptions or derogations), shall apply to individuals who are protected by the GDPR (as applicable):

- You have a right to access information held about you. Your right of access is normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we amend any Personal Data we hold that it is inaccurate or misleading;
- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object to or to request restriction of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority;
- The right to withdraw your consent. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations;
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at finder@sncentral.org. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. USE BY CHILDREN

We do not offer our products or services for use by children. We do not knowingly collect information from, and/or about children.

7. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at finder@sncentral.org.