

# PRIVACY POLICY

This document describes how we at StartupTools Europe AB, Reg. No 559303-6436 (“**StartupTools**”, “**we**”, “**our**” or “**us**”) treat data that we collect and/or process when you, the data subject, use our services or products, either provided through our site, the platform or as consultancy services.

We are committed to being as transparent as possible in relation to our processing of your personal data. Periodically, we may update this privacy policy (“**Privacy Policy**”) to provide you with new features and functions in our services. When we do this, we will take reasonable measures to inform you of such updates (unless the changes made are non-material or insignificant). If you have any questions regarding our use of your personal data, do not hesitate to contact us by using the contact details provided at the end of this Privacy Policy.

This Privacy Policy only applies to personal data processed by StartupTools within the scope of our service. This Privacy Policy does not cover other parties that may be involved in the provision of the services. Hence, we recommend that you check such provider’s privacy statements.

Throughout this Privacy Policy the term “**processing**” is used to cover all activities involving your personal data, including e.g. collecting, handling, storing, sharing, accessing, using, transferring and disposing of your personal data.

“**Applicable Data Protection Laws**” means all legislation and regulations, including regulations issued by relevant supervisory authorities, protecting the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of personal data that from time to time applies to this Privacy Policy, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “**GDPR**”) as well as laws and regulations supplementing the GDPR.

“**Personal data**” means any information relating to an identified or identifiable natural person.

## THE DATA CONTROLLER

StartupTools Europe AB, Reg. No 559303-6436, KIVRA: 559303-6436, 106 31 Stockholm is the data controller for the processing of your personal data as described in this Privacy Policy.

## THE PERSONAL DATA THAT WE COLLECT FROM YOU

We collect different types of personal data from:

- **Yourself**, which you submit to us in connection with signing up to newsletters, downloading free templates, visiting our site and during your use of our service
- **Other sources**, which, *inter alia*, may include information from publicly available sources and information from third parties

You can always choose not to provide us with voluntary information. However, some personal data is necessary for us to provide you with the service. Not providing such personal data may prevent us from performing what you expect from us.

# WHY DO WE PROCESS YOUR PERSONAL DATA?

We process your Personal data for different purposes to provide our service to you, including to create and administer your account, provide you with support, information, or other notifications regarding our service, carry out software updates as well as perform other obligations as per the agreement between you and us. In this section we explain why we use your Personal data with examples and on which legal ground we base our processing upon.

## How long will we store your personal data?

We will only keep your data for as long as necessary for the purpose for which it was collected or such longer period that may be stipulated in applicable law. It is important to us that you know for how long we will store your Personal data. Hence, it will be set out in the processing categories specified below.

### 1. Using our services on the platform

We will process your Personal data to be able to provide the services on our platform and to secure a fast, responsive, and secure platform and to deliver the specific functions that you want.

For this purpose we may use necessary cookies. Read more about how we use our cookies in our [cookie-policy](#).

<b>Purpose</b>	Register a use account to enable the data subject to access the services and to provide the service on the platform. Verify user login credentials to increase security and prevent abuse. Communicate in order to efficiently help the data subject with the services
<b>Categories of Personal Data</b>	Name, email, IP-address, phone number, title, personal identification number
<b>Source</b>	From the data subject i.e. you and from the Company Registry and Ratsit
<b>Legal Basis</b>	To perform our contractual obligation as well as the legitimate interest of verifying the user identity to increase security and prevent abuse and delivering the service on the platform
<b>Storage Period</b>	For as long as the data subject is entitled to a user account or such longer period that the parties agree upon termination of such account

### 2. Visitors to our Website

When someone visits our website we use a third party service, plausible.io, to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow plausible.io to make, any attempt to find out the identities of those visiting our website.

For this purpose we may use necessary cookies. Read more about how we use our cookies in our [cookie-policy](#).

### 3. Downloading templates from our site

We provide free templates on our site to enable you to grow your company. If you download a template we will ask for your consent to save your Personal data in accordance with below.

<b>Purpose</b>	To download templates from our site
<b>Categories of Personal Data</b>	Name, email, IP-address
<b>Source</b>	From the data subject i.e. you
<b>Legal Basis</b>	Consent received from the data subject
<b>Storage Period</b>	Until you withdraw your consent

#### 4. Customer support through chat and e-mail

In order to provide our customers with efficient support we need to collect your Personal data to be able to communicate through chat and e-mail.

<b>Purpose</b>	Communicate in order to efficiently support our customers
<b>Categories of Personal Data</b>	Name, email, IP-address, phone number
<b>Source</b>	From the data subject
<b>Legal Basis</b>	The legitimate interest of verifying the user in order to provide an efficient service and the our contractual obligation to support our customers
<b>Storage Period</b>	For as long as the data subject is entitled to a user account or such longer period that the parties agree upon termination of such account

#### 5. Purchase items from our webshop

We will process your Personal data to be able to process your purchase in our webshop. We use the information to contact you regarding your purchase, process your payment, if we need to obtain or provide additional information and to ask for feedback.

<b>Purpose</b>	Processing the purchase of items in our webshop
<b>Categories of Personal Data</b>	Name, address, email, IP-address, phone number
<b>Source</b>	From the data subject
<b>Legal Basis</b>	The legitimate interest of verifying the user identity to increase security and prevent abuse, delivering products purchased and processing the payment and for bookkeeping purposes i.e. legal requirement
<b>Storage Period</b>	For as long as necessary to deliver your purchase, we will also store personal data in accordance with applicable law i.e the Accounting Ac (Sw. Bokföringslagen)

#### 6. Subscribing to our newsletters

As part of the registration process for our e-mail newsletter, we collect personal information: We use that information to tell you about stuff, to send information about new and updated documents, tools and services that we provide, to contact you if we need to obtain or provide additional information, to ask for feedback, to check our records are right and to check every now and then that you're happy and satisfied. You consent to receiving newsletters and the moment you do not wish to receive them you may withdraw your consent. You can unsubscribe at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing [help@startuptools.org](mailto:help@startuptools.org).

We use third party providers, MailChimp and Hubspot, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see MailChimp's and Hubspot's privacy notices.

<b>Purpose</b>	Sending newsletters to newsletter subscribers
<b>Categories of Personal Data</b>	Name, email
<b>Source</b>	From the data subject
<b>Legal Basis</b>	Consent
<b>Storage Period</b>	For as long as the data subject wish to receive our newsletters

## 7. Making donations

We are very fortunate to sometimes receive donations, we may collect Personal Data in order to process the donation.

<b>Purpose</b>	Making donations
<b>Categories of Personal Data</b>	Name, email, IP-address, phone number (if provided)
<b>Source</b>	From the data subject
<b>Legal Basis</b>	Legal requirement
<b>Storage Period</b>	The legal requirement in accordance with the Accounting Act (Bokföringslagen)

## 8. Statistics and analytics for the purpose of improving the services and enhancing user experience.

<b>Purpose</b>	Statistics and analytics for the purpose of improving the Services and enhancing the user experience as well as for business purposes
<b>Categories of Personal Data</b>	Email, IP-address, browser information
<b>Source</b>	From the data subject
<b>Legal Basis</b>	The legitimate interest of providing the services
<b>Storage Period</b>	7 days

## 9. Legal Obligations

We may disclose information when legally compelled to do so, in other words, when we, in good faith, believe that the law requires it or for the protection of our legal rights or when compelled by a court or other governmental entity to do so.

<b>Purpose</b>	Necessary to meet legal requirements e.g. book keeping, money laundering
<b>Categories of Personal Data</b>	Name
<b>Source</b>	From the data subject
<b>Legal Basis</b>	The process is necessary to meet legal requirements

<b>Storage Period</b>	During the period that is necessary to meet the legal requirement or in accordance with applicable law
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## 10. Security Measures to prevent misuse and crimes

To ensure that we protect your privacy and to create security in our business, we work actively with our security to prevent misuse of our services, unauthorized access to our Services and to prevent and investigate crimes against our organization. For this purpose, personal data may be processed.

For this purpose, we may use necessary cookies. Read more about how we use cookies in our [cookie policy](#).

<b>Purpose</b>	<ul style="list-style-type: none"> <li>• Prevent spam, phishing, harassments, unauthorized login attempts or other actions that are prohibited in accordance with our general terms and conditions</li> <li>• To prevent and investigate potential frauds or other breaches of law</li> <li>• Taking measures, including use of necessary cookies, to protect and improve our IT-environment against attacks and breaches</li> </ul>
<b>Categories of Personal Data</b>	<ul style="list-style-type: none"> <li>• User generated data (e.g. clicks and visitor statistics)</li> <li>• Unit information e.g. which unit you use, language and web-settings, time zone</li> <li>• Name</li> <li>• Online identification, e.g IP-address, cookieID, userID and other similar ID:s</li> </ul>
<b>Source</b>	The data subject
<b>Legal Basis</b>	The legitimate interest in providing secure services and to prevent misuse and investigate crimes
<b>Storage Period</b>	36 months after the end of the year when the personal data was collected. If we suspect misuse of a service or that crime has been committed we will store the date for as long as necessary to defend our legal claim

Who may we share your personal data with?

## 1. Data Processors

In some situations, it is necessary for us to engage other parties in order to carry out our work. This includes, for example when we use various IT suppliers. They are to be regarded as personal data processors to us and they only process personal data in accordance with our instructions. We have entered into data processing agreements (DPA's) with all our processors. Each DPA sets out, among other things, how the processor may process your personal data and the security measures the processor must have in place.

## 2. Independent Data Controllers

We also share your personal data with certain other parties that are independent data controllers. We may also disclose personal data to third parties, such as the police or other authorities, if it concerns the investigation of a crime or if we are otherwise obliged to disclose such information by law or a decision by a public authority.

## 3. Third-country transfers

We always strive to ensure that your personal data is processed within the EU/EEA, but sometimes we may be forced to transfer personal data to countries outside the EU/EEA. We only disclose your personal data to a country outside the EU/EEA if there are sufficient guarantees that your personal data will be handled in a good manner.

## YOUR RIGHTS

Under Applicable Data Protection Laws, you have certain rights in relation to the processing of your Personal data. We process your Personal data to the extent necessary to fulfil your rights. Please submit requests for exercising your rights by contacting us by using the contact details set out below. You have, under certain circumstances, the right to exercise the following rights:

- **Access**  
You may request confirmation whether Personal data about you is processed by us and, if that is the case, access your Personal data and additional information such as the purposes of the processing. You are also entitled to receive a copy of the Personal data undergoing processing.
- **Object to certain processing**  
You have the right to object to the processing of your Personal data based on a legitimate interest for reasons which concerns your particular situation. In such a situation, we will stop using your Personal data where the processing is based on a legitimate interest, unless we can show that the interest overrides your privacy interest or that the use of your Personal data is necessary to manage or defend legal claims.
- **Rectification**  
You have the right to obtain from us the rectification of inaccurate Personal data concerning you.
- **Erasure**  
You may have your Personal data erased under certain circumstances, such as when your Personal data is no longer needed for the purposes for which it was collected.
- **Restriction of processing**  
You may ask us to restrict the processing of your Personal data to only comprise storage of your Personal data under certain circumstances, such as when the processing is unlawful, but you do not want your Personal data erased.

- **Withdrawal of consent**

You have the right to at any time withdraw your consent to processing of Personal data to the extent the processing is based on your consent.

- **Data Portability**

You have the right to receive the Personal data concerning you which you have provided to us in a structured, commonly used, and machine-readable format and ask for the information to be transferred to another data controller (where possible).

## Complaints to the supervisory authority

In case of complaints regarding StartupTools' privacy practices, you have the right to lodge a complaint with the competent supervisory authority. For more information, please visit the relevant authority's website. In Sweden, the supervisory authority is the Swedish Authority for Privacy Protection. You can learn more about how to lodge a complaint with the Swedish Authority for Privacy Protection [here](#).

## CONTACT US

If you have any questions or concerns regarding the processing of your personal data, please contact us by using the contact details below.

The data controller for your personal data is:  
StartupTools Europe AB  
Reg. No 559303-6436,  
Address: KIVRA: 559303-6436, 106 31 Stockholm  
E-mail address: [help@startuptools.org](mailto:help@startuptools.org)