

Privacy Policy

GENERAL INFORMATION ON DATA PROCESSING ACTIVITIES RELATING TO THE OPERATIONS OF JUNCTION OY

JunctionXVienna is an innovation competition (“Event”) organized by Lemmings (“the Company”, “We”).

The purpose of this Privacy Policy is to clarify and inform the applicants, participants, and other visitors of the Events and the users of the Websites (all the individuals mentioned above referred to as “Users”) on how their personal data is processed and stored.

In this Privacy Policy, the Websites and the services offered on the Websites are collectively referred to as the “Services”. This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on the Website.

Please note that this Privacy Policy only covers data processing carried out by Junction Oy as data controller. Our third-party licensees organizing Junction or JunctionX events are typically the controller of the participant data collected in relation to such events.

1. CONTROLLER’S CONTACT DETAILS

Name: Lemmings – Verein zur Förderung von Kunst und Technologie

Business ID:

Correspondence address: PL1188, 00101 Helsinki, Finland

E-mail: vienna@hackjunction.com

Contact person: David Pfluegl

Name: David Pfluegl

Telephone: +43 6769663232,

E-mail: david.pfluegl@hackjunction.com

2. PERSONAL DATA PROCESSED AND SOURCES OF DATA

User data and analytics data

We collect two types of information from the Users: User Data and Analytics Data. Although we do not normally use Analytics Data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with User Data. In such situations, Analytics Data can also be considered to be personal data under applicable laws and we will treat the combined data as personal data.

The Company may collect and process the following User Data received from the Users via registration/application forms completed on the Websites or by email, User Data received from the Users on the phone or in person at the Events and User Data generated by us:

- First name
- Last name
- Phone number
- Date of birth
- Email
- Postal address
- Pictures
- Roles and responsibilities in the company the User represents
- Information regarding skills, education and professional background
- CV's and other certificates
- Customer feedback received via email or in person
- Information relating to approvals and rejections of the User's Event applications
- Data transfer consents and prohibitions
- Marketing opt-ins and opt-outs
- Any other information provided by the User on the Website or at the events, such as information relating to allergies and special diets.

In addition to the above mentioned, we obtain User Data from registers maintained by the authorities and customer default registers as well as other reliable private and public registers.

Analytics Data we gather in connection with the use of our Website includes for example the following data: (i) your IP address; (ii) device and device identification number; (iii) operating system; (iv) time of visit; (v) browser type and version; (vi) language setting.

Analytics Data we gather in connection with the use of our Website includes for example the following data: (i) your IP address; (ii) device and device identification number; (iii) operating system; (iv) time of visit; (v) browser type and version; (vi) language setting.

Cookies

We use various technologies to collect and store Analytics Data and other information when the Users visit the Websites, including cookies and web beacons.

Cookies are small text files sent and saved on your device that allows us to identify visitors of the Websites and facilitate the use of the Services and to create aggregate information of our visitors. This helps us to improve the Services and better serve our Users. The cookies will not harm your device or files. We use cookies to tailor the 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. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

https://support.apple.com/kb/PH19214?viewlocale=en_US&locale=en_US

https://support.google.com/chrome/answer/95647?hl=en&p=cpn_cookies

<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>

<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Please note that some parts of the Services may not function properly if use of cookies is refused.

A web beacon is a technology that allows identifying readers of websites and emails e.g. for identifying whether an email has been read.

3. PURPOSES AND LEGITIMATE GROUNDS FOR PROCESSING OF PERSONAL DATA

Purposes

There are several purposes for the processing of personal data by the Company:

To provide and develop the Services and to organize and develop the Events

We process personal data in the first place to be able to offer the Services to the Users, to organize the Events as well as for User verification. We process personal data for the evaluation and selection of potential applicants and team members for the Events.

We also process the personal data provided by the Users in order to develop the quality of our Services and Events, for instance by analyzing the employment histories of the Users and the programs the Users have applied to.

For customer communication and marketing

We process personal data for the purpose of maintaining our customer relationships with the Users, for instance by contacting the Users regarding the Services and Events. We also process personal data of the Users in order to inform the Users of changes relating to the Services and the Events. We use personal data for marketing and advertising the services and products provided by us, e.g. to customize the User's experience by providing the User with targeted offers and advertising information based on the information gathered from the User during his/her previous visits to the Services and to the Events.

If the User contacts us to give feedback with respect to our Services or Events, we will use the provided information for answering questions and solving possible issues.

For the recruitment and headhunting purposes

We process User Data for the purpose of providing such data to our Recruitment Partners (as defined below) for recruitment and headhunting purposes.

Legitimate grounds for processing

We process personal data to perform our contractual obligations towards the Users with respect to the Users registered on our Websites and Users having applied or registered as participants or attendees in the Events. Furthermore, we process personal data based on our legitimate interest. Our legitimate interest is based on running, maintaining and developing our business, improving the customer or visitor experience of the Users as well as on performing direct marketing. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy and e.g. provide you with easy to use opt-out from our marketing communications and use pseudonymized or non-personally identifiable data when possible. In some parts of the Services, the Users may be requested to grant their consent for the processing of personal data. In this event, Users may withdraw their consent at any time.

4. TRANSFERS TO COUNTRIES OUTSIDE EUROPEAN ECONOMIC AREA

The Company stores the Users' personal data primarily within the European Economic Area. However we have service providers in several geographical locations. As such, we, and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which it is 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](#).

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

5. RECIPIENTS

We only share personal data within the Junction organisation if and as far as reasonably necessary to perform and develop our Services and the arrangements relating to the organization of the Events. We do not share personal data with third parties outside of Junction organization unless one of the following circumstances applies:

For legal reasons

We may share personal data with third parties outside Junction 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 the Company, the Users or the public in accordance with the law. When possible, we will inform the Users about such transfer and processing.

To authorized service providers

We may share personal data to authorized service providers who perform services for us (including data storage, sales, marketing and customer support services). 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.

With explicit consent

We may share personal data with third parties outside the Junction organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so. For instance, in connection with the application process to the Event on the Website, the User may grant us his/her consent to share some User Data with the following third party service providers: aTalent Recruiting Oy ("Recruitment Partners") for recruitment purposes.

The User has the right to withdraw the above mentioned consents at all times. Note, however, that the withdrawal of consent relating to the transfers of User Data to Recruitment Partners relates solely to the future transfers of the User Data from us to such Recruitment Partners and not to the transfers having taken place prior to the withdrawal or the processing activities of the Recruitment Partners. The Recruitment Partners are solely responsible for their processing of User Data and the User shall contact the Recruitment Partners independently should he/she have questions relating to their processing activities or should he/she want to prohibit them from further processing the User Data.

6. STORAGE PERIOD

We do not store your personal data longer than is legally permitted and necessary for the purposes of providing the Services and Events or the relevant parts thereof. The storage period depends on the nature of the information and on the purposes of processing. The maximum period may therefore vary per use. We will store the User Data collected in connection with the registration or application process for as long as the User in question is a registered user of our Services, subscriber of our newsletters or an applicant or participant of our Event. We will delete

or anonymise all the User Data within a reasonable time and at the latest after 5 years after the end of the latest Event you have participated in, save for when we are required by law, claims handling or accounting standards to store some of such information in the form of personal data. Please note that if you are a registered User of our Services, we will store your User Data relating to your application for as long as you have a user account on the Website. A registered User may, at any time, delete his/her user account. Thereafter, we will delete or anonymise all your User Data within a reasonable time, save for when we are required by law, claims handling or accounting standards to continue storing some of such information in the form of personal data. We will store Analytics Data of registered users of our Services for the duration of the registration period and thereafter for a reasonable time, but no longer than 24 months for the purposes specified in this Privacy Policy. We will store Analytics Data of unregistered users of our Services for a reasonable time, but not longer than 24 months for the purposes specified in this Privacy Policy.

7. USERS' RIGHTS

Right to access

The Users have the right to access the personal data relating to them and processed by the Company. This means that the Users may contact us, and we will inform what personal data we have collected and processed regarding the said User and communicate the purposes such data are used for.

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 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 on the addresses indicated above, the User may update e.g. his/her contact details or other personal data.

Right to deletion

The Users may also ask us to delete the Users' 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 object

You may have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the performance of the Services or organization of the Events or for compliance with a legal obligation. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the Services or to participate in the Events.

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. This may however lead to fewer possibilities to use the Services or to participate in the Events.

Right to data portability

The Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

How to use the rights

The above mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above. 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.

8. 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 addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

9. 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 Austria, the local supervisory authority is the Austrian Data Protection Authority (DSB) (<https://www.data-protection-authority.gv.at/>).

10. Information Security

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Measures include for example, 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. We regularly test the Websites, systems, and other assets for security vulnerabilities.

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.