

BALTIC VCA SUMMIT 2019

PRIVACY POLICY

Eesti Era- ja Riskikapitali Assotsiatsioon MTÜ (“**EstVCA**”) is the main organiser of Baltic VCA Summit 2019 (“**Summit**”). This Privacy Policy (“**Policy**”) explains how EstVCA processes (e.g. collects, uses, stores, shares) and protects the personal data of attendees of Baltic VCA Summit 2019 who have registered their attendance through the online registration form (<http://www.estvca.ee/summit>) or by any other means of communication if such option has been made available (“**Attendee(s)**”). EstVCA has the right to update or amend this Policy at any time. Should there be any amendments to the data processing purposes or any other material changes to this Policy, we will let you know via our website or using the contact details you provide us.

Information on Data Controller

While registering for the Summit, using the services of our website or communicating with us via our website, the controller of your personal data is:

Eesti Era- ja Riskikapitali Assotsiatsioon MTÜ

Registration code: 80295682

Legal address: Tartu mnt 2, 10145, Tallinn, Harju county, Republic of Estonia

Contact details: Kristiina Koort; phone +372 57502049; e-mail kristiina@estvca.ee

What kind of personal data we process, why and on what legal basis?

We only process your personal data in order to enable your registration to the Summit and to provide services and information regarding the Summit upon your registration through our website <http://www.estvca.ee/summit> or by any other communication means if such option has been made available.

By registering for the Summit, you are providing EstVCA with your personal data and contact information as requested in the online booking form.

In order to achieve the above-mentioned, we process the following data:

Type of personal data	The purpose of processing	Legal basis
<ul style="list-style-type: none">- Name, surname;- Contact details of the Attendee (country, phone, e-mail of the Attendee);- Information on VCA membership;- Information on place of employment, position in the company;- Billing information;- Information on meal and free time activities preferences;	For registration and facilitation of the Attendee at the Summit, to organise the Summit, i.e. to organise activities for the Attendee and to provide the Attendee with necessary information and updates regarding the Summit and to provide the Attendee with appropriate materials (for example name tags) necessary for the ingratiating participation at the Summit.	<p>The processing of your personal data is necessary for the performance of the contract to which the data subject is party (Art 6 (1) (b) of the GDPR);</p> <p>Our obligation to be compliant with legal obligations to which EstVCA is subject (e.g. obligation to organise accounting and financial reporting) (Art 6 (1) (c) of the GDPR)</p> <p>Our legitimate interest to organise and hold a successful event for all the Attendees (Art 6 (1) (f) of the GDPR);</p> <p>Our legitimate interest to provide regular updates regarding the Summit, as well as activities and future events</p>

		organised by EstVCA (Art 6 (1) (f) of the GDPR).
- Visual materials on the Attendees (photos, videos, etc)	For the purposes of publishing marketing materials; For the purposes of capturing the events held during the Summit.	Your consent (Art 6 (1) (a) of the GDPR); Our legitimate interest to organise and hold a successful event for all the Attendees (Art 6 (1) (f) of the GDPR);

If we process your personal data under your consent (Art. 6 (1) (a) of the GDPR), we will explain the purpose of processing the personal data beforehand.

If the processing of personal data is based on our legitimate interest or legitimate interest of a third person, we have shared your personal data to, you have the right to object to such processing.

Personal data we share with third parties

Your personal data is only accessible to authorised persons, who are obliged not to disclose your personal data to anyone.

While providing services to you it may be necessary for us to share your personal information with third parties. We share your personal data with third parties unless it is necessary to provide services to you or required by law. EstVCA may share your personal data with:

- 1) service providers whose involvement is necessary for organising the Summit such as hotels, activity centres, marketing and technology services. Our agreements require these service providers to only use your data in connection with the services they perform for us for the purposes of organising the Summit and prohibit them from selling your data to anyone else. We provide to them only data inevitable for them to provide us their quality services;
- 2) law enforcement agencies, officials or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure or when EstVCA is the victim of a fraud or other crime (in the latter case, for example, data associated with the perpetrators may be shared with law enforcement).
- 3) other third parties with your consent or direction to do so.

Transmission of your personal data to third parties will only be conducted following the principles relating to processing of personal data and obligations arising from the EU and Estonian data protection laws. We share your personal data to third parties only to the necessary extent.

Third parties to whom we will transmit personal data, can be in the European Economic Area and outside of it in countries where the European Commission has not assessed the level of data protection or considered the respective country to be sufficient by way of its adequacy decision. Personal data is transferred outside the European Economic Area only if it is in compliance with EU data protection laws and only if appropriate safeguards can be applied.

EstVCA makes sure that all third persons to whom your personal data will be transferred have implemented appropriate technical and organisational measures in such a manner that processing will meet the requirements stipulated in EU data protection laws.

Protection of your personal data and retention periods

EstVCA has implemented the necessary organisational, physical and informational security measures to protect your personal data against any misuse, unauthorised access, disclosure, alteration or destruction. This applies, inter alia, to personal data we transmit abroad.

Your personal data is received through our online website, hosted by Edicy OÜ. All personal data is automatically backed up on a regular basis. We remain fully responsible for your personal data and we ensure that your personal information is protected through the contracts we have concluded with our partners. Should you require more information about the service providers we use, please contact us at the above contacts.

Your personal data will be deleted when the Summit is over, and the retention periods stipulated in law are exhausted. We retain your personal data for three years after the Summit for the purpose of defending ourselves from any potential claims.¹ Billing information and accounting documents will be preserved for seven years as of the end of the financial year when a business transaction was recorded in the accounting journals and ledgers on the basis of the source documents.² If the processing of your personal data is based on your consent, you shall have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

In any case we may maintain anonymous data, including transaction data which is not directly linkable to you for the statistical purposes.

Rights of the data subject under this Policy

You have all the rights stipulated in EU data protection laws, considering the stipulated limitations and restrictions. You may request information about your personal data, which we process, and submit requests for correcting any of your incorrect personal data.

Pursuant to applicable laws, you may request deletion or limiting of the processing of your personal data. We cannot satisfy these requests if we have ongoing contractual relationships (meaning that we need to process your personal data to fulfil our obligations under the contract concluded between us), if we need to process your personal data to fulfil our legal obligations, or if any other limitations set out in the applicable law apply.

You may also object to our data processing, if you find that we process your personal data or parts of your personal data in violation of your rights. We can continue to process your personal data if it is necessary for the defence of legal claims, or for any other exceptions permitted by applicable law.

You have the right to withdraw your consent provided for any data processing activity at any time. The withdrawal of consent shall not affect the lawfulness of other data processing activities not based on the respective consent.

You have the right to lodge a complaint to Estonian Data Protection Inspectorate (www.aki.ee) for the protection of your rights.

If you wish to exercise your rights, please contact us at the contact details outlined above.

¹ Pursuant to the General part of the Civil Code Act

² Pursuant to the Accounting Act