

Slush Privacy Statement

Slush Oy and its affiliated companies (“Slush”), collect personal data of its customers and visitors of its websites whilst providing its services.

Slush processes your data with due care, in accordance with all applicable laws and regulations.

Our Privacy Statement explains what data we process, how we do that and how you may use your rights as a data subject (e.g. right to object, right of access).

This Privacy Statement constitutes a description of the data file of the users of our services and websites as set out in the Finnish Personal Data Act (Sections 10 and 24).

This Privacy Statement may be updated from time to time. You can find the current version on our website slush.org. This Privacy Statement applies to all personal data that Slush processes during the execution of our services, including the personal data of visitors of the Slush websites.

This Privacy Statement only covers data processing carried out by Slush. The Privacy Statement does not address and we are not responsible for, the privacy practices of any third parties.

1. Identity of the controller of the processing of your personal data

The controller of the processing of the personal information is: Slush Oy

Company ID in Finnish Trade Register: 2554151-6

Correspondence address: Pursimiehenkatu 29-31, Staircase F, 3rd floor, 00150 Helsinki

E-mail address: support@slush.org

<http://www.slush.org>

2. Personal data processed and sources of data

Slush collects two types of information from our Users: (i) User Data; and (ii) Technical Data. Although we do not normally use Technical Data to identify you as an individual, you can sometimes be recognized from it. In such situations, Technical Data can also be considered personal data under applicable laws.

We may collect and process the following User Data about our customers and visitors: (i) first and last name; (ii) address details, (iii) telephone number, (iv) e-mail address, (v) your location when you use our services, (vi) payment details, (vii) other personal data you provide yourself, including pictures, for example when creating a profile, in correspondence and by phone.

We may collect User Data from our customers and visitors in a variety of ways, including, when they register to our services, subscribe to a newsletter, buy a ticket to one of our events or fill out a form. Further, please note that we also collect details of any transactions and payments you carry out through our services. We will collect User Data from customers and visitors only if they voluntarily submit such information to us or carry out transactions or payments through our services or sites.

We and/or our authorized third party service providers, may automatically collect Technical Data when you visit or interact with our services or sites. Technical Data may include the browser name, the type of computer or device, time spent on website, interaction with the Services, URL of the website you visited before and after visiting the Services, the time and date of user visits, surfing habits, IP address, operating system and the Internet service providers utilized and other similar technical information.

Cookies

We use various technologies to collect and store information when you visit a Slush website, including cookies. Cookies allow us to calculate the aggregate number of people visiting our websites and monitor the use of the websites. This helps us to improve our websites and better serve our users. We also use cookies that make the use of the website easier for you, for example by remembering usernames, passwords and (language) preferences. We also use tracking and analytics cookies to see how well our services are being received by our users.

You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If you do so, note that some parts of our sites and services may not function properly. For more information about cookies and how to delete them, visit www.allaboutcookies.org.

Our sites use Google Analytics and other web analytics services to compile reports on visitor usage and to help us improve our sites and services. For an overview of Google Analytics, please visit <http://www.google.com/analytics/>. You can opt-out of Google Analytics with this browser add-on tool: <https://tools.google.com/dlpage/gaoptout>.

3. Purposes and legitimate grounds for the processing of your personal data

Purposes

There are several purposes of the processing of your personal data by Slush:

To provide our services and carry out our agreement with you

Slush processes your personal data in the first place to be able to deliver our services to you and to run, maintain and develop our businesses. We use the data for example to handle your payments,

provide services or contact you regarding your registration to one of our events. If you contact our customer service, we will use the information provided by you to answer your questions or solve your complaint. In order to ensure that our services are in line with your needs, these data can be used for things like customer satisfaction surveys. We might also request another party to do this for us.

For customer communication (including marketing)

Slush processes your personal data to contact you regarding our services and to inform you of changes to our services and products. Your data are also used for research and analysis to improve our services and our websites. We may also use your data entered on our websites in certain cases to send information by e-mail about other services of Slush to you, provided that you have given us consent to that.

For quality improvement and trend analysis

We may also process information about your use of the services to improve the quality of our services e.g. by analyzing any trends in the use of our services. When possible, we will do this using only aggregated, non-personally identifiable data.

Legitimate grounds for processing

Slush processes your personal data to perform our contractual obligations towards you and to comply with legal obligations. Furthermore, we process your personal data to pursue our legitimate interest to maintain and develop our businesses.

4. Transfer to countries outside Europe

Slush may transfer your personal data to countries outside the European Union and the European Economic Area. When we transfer any data to a country for which no adequacy decision of the European Commission exists, such transfer will be subject to the provisions of the (standard or other) clauses adopted by the European Commission. If you wish to know more about international transfers of your personal data, you may contact us via the contact details above.

5. Recipients

We only share your personal data within the organization of Slush if and as far as reasonably necessary to perform and develop our services, e.g. with our customer service and marketing employees.

We do not share your personal data with third parties outside of Slush unless one of the following circumstances applies:

It is necessary for the purposes of this Privacy Statement

To the extent that third parties need access to personal data to perform such services, Slush has taken the appropriate contractual and organizational measures to ensure that your data are processed exclusively for the purposes specified in this Privacy Statement and in accordance with all applicable laws and regulations. Furthermore, we may provide your personal data to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in accordance with our Privacy Statement and any other appropriate obligations of confidentiality and security measures.

For legal reasons

We may share your personal data with third parties outside Slush 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 Slush, our users or the public as far as in accordance with the law. When possible, we will inform you about such processing.

With your explicit consent

We may share your personal data with third parties outside Slush for other reasons than the one mentions before, when we have your explicit consent to do so, unless such is necessary for the provisions of our services. You have the right to withdraw this consent at all times.

6. Storage period

Slush does not store your personal data longer than is legally permitted and necessary for the purposes for which the data were collected. The storage period depends on the nature of the information and the purposes of processing. The maximum period may therefore vary per use. In general, we store data for the provision of services for a maximum of five years after our relation ended.

7. Your rights

Right to access

Slush offers you access to the personal data we process. This means you can contact us asking us to inform you about your personal data that we have collected and processed and the purposes such data are used for.

Right to correct

You have the right to have incorrect/unprecise, incomplete, outdated, or unnecessary personal data we have stored about you corrected or completed by contacting us.

Right to deletion

You may also ask us to delete your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data. After the data have been deleted, we may not immediately be able to delete all residual copies from our active servers and backup systems.

Right to object

You may object to certain use of your personal data if such data are processed for other purposes than necessary for the performance of our services or for compliance with a legal obligation. You may also object any further processing of your personal data after prior given consent. If you object to the further processing of your personal data, this may lead to fewer possibilities to use our websites and other services.

You have the right to opt out of receiving electronic direct marketing communications from us by clicking on the opt-out link provided in all marketing communications we send you and choosing not to receive marketing communications from us in the future. You also have the right to prohibit us from using your personal data for direct marketing purposes, market research and profiling by contacting us on the addresses indicated above.

Right to restriction of processing

You may request us to restrict certain processing of your personal data. If you restrict certain processing of your personal data, this may lead to fewer possibilities to use our websites and other services.

Right to data portability

You have the right to receive your personal data from us in a structured, commonly used format in order to transmit the data to another controller.

How to use your rights

You may use these rights by sending a letter or e-mail, including your name, address, phone number and a copy of a valid ID to us on the addresses set out above. If your request regards personal data in a cookie, you have to enclose a copy of the said cookie. We may request the

provision of additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded. In case you consider our processing activities of your personal data to be inconsistent with the applicable data protection laws, you may lodge a complaint with the local supervisory authority for data protection.

8. Information security

We will take all reasonable, appropriate security measures to protect Slush and our customers from unauthorized access to or unauthorized alteration, disclosure or destruction of personal data we hold. Measures include, where appropriate, encryption, firewalls, secure facilities and access rights systems. Should despite of the security measures, a security breach occur that is likely to have negative effects to your privacy, we will inform you about the breach as soon as reasonably possible.

9. Applicability and changes

Our Privacy Statement applies worldwide, to all of the services offered by Slush. This Privacy Statement is published in English. Our Privacy Statement may change from time to time. You can find the current version on our website slush.org. We will not make substantial changes to this Privacy Statement or reduce your rights under this Privacy Statement without providing you with a notice.