



PRIVACY POLICY

This Privacy Policy refers to the processing of data collected by Plataforma Starten Incubator, referring to the <https://starten.global> website, in particular with regard to the incubation form. Furthermore, this policy follows the regulations of the General Law for the Protection of Personal Data (LGPD/Brazil), GDPR (Europe), as well as international data processing and protection legislation.

Starten Incubator values the privacy of its users and has created this Privacy Policy to demonstrate its commitment to protecting their privacy and personal data under national and international laws on the protection of personal data, as well as describing how their privacy is protected by Starten Incubator when collecting, store your personal information.

In addition, this policy generally applies to all Users and potential Users of the services offered by Starten Incubator, including Users of the websites or other means operated by Starten Incubator and defines how Starten Incubator may collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control the information, modify, communicate, transfer, disseminate or extract the collected data, including personally identifiable information, in accordance with applicable legal bases and all applicable data privacy and protection laws. Finally, it should be emphasized that as updates occur, this document will gain new versions.

Furthermore, by accessing and/or using the <https://starten.global> website, as well as incubation form (see our Terms of Use), the User must have full and express capacity for the acts of civil life to accept the terms and conditions of this Privacy Policy.

If the User does not fit the above description and/or does not agree, even if in part, with the terms and conditions contained in this Privacy Policy, he/she shall not access and/or use the services offered by Starten Incubator, as well as the websites and services operated by it.

1. Definitions

User: all individuals and/or legal entities who will use or visit the starten incubator website and incubation form, fully capable of practicing the acts of civil life or those absolutely or relatively incapable properly represented or assisted.

Personal Data (individuals): means any information provided and/or collected by Starten Incubator and/or its affiliates by any means, even public, that: (I) identifies, or that, when used in combination with other information processed by Starten Incubator, identifies an individual; or (II) through which the identification or contact information of a natural person may be derived. Personal Data may be in any media or format, including electronic or computerized records, as well as in paper-based files. Personal Data, however, does not include business phone, business mobile number, business address, business email.

Purpose: the goal and purpose that Starten Incubator wishes to achieve from each act of processing personal information.

Need: justification for which it is strictly necessary to collect personal data, to achieve the purpose, avoiding excessive collection.

Legal bases: legal basis that makes legitimate the processing of personal data for a certain prior purpose by Starten Incubator.



Consent: express and unambiguous authorization given by the User holding the personal data for Starten Incubator to process his personal data for a previously described purpose, in which the legal basis necessary for the act requires the express authorization of the holder.

2. Owner and Data Controller

Depending on the provisions of the General Law for the Protection of Personal Data (LGPD/Brazil), the owner responsible for the processing of data is Starten Incubator.

2.1 . Data Types Collected

Use of Data and other collected data

Full details about each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific callouts displayed prior to data collection.

Personal Data may be provided freely by the User, or, in the case of Usage Data, collected automatically when using the Starten Incubator platform.

Unless otherwise specified, all requested platform data is required and failure to provide this Data may make it impossible for the platform to play regularly. In cases where the platform specifically states that some Data is not required, Users are free to stop communicating this Data without any consequence to the availability or operation of the platform.

Users who have questions about which Personal Data is required are invited to contact the DPO (data protection officer) by e-mail: dpo@starten.global.

Any use of cookies – or other tracking tools of platform - has the purpose of performing the actions provided in our forms.

Users are responsible for any Personal Data of third parties that is obtained, published or shared through the functions of the Starten Incubator platform and confirm that they have the authorization of the third parties to provide the Data.

2.2 . Processing method

Starten Incubator will take appropriate security measures to prevent unauthorized access, disclosure, alteration or unauthorized destruction of the Data obtained. Data processing is carried out using computers and /or it tools enabled, following organizational procedures and means strictly related to the purposes indicated in the forms. In addition to the Starten Incubator, in some cases, the Data can be accessed by certain types of persons in charge, involved with the operation of the platform (administration, sales, marketing, legal administration of the system, legal and other departments of Starten Incubator) or external persons (such as third-party technical service providers, postmen, hosting providers, IT companies, communication agencies) appointed, when necessary, as Data Processors by the Starten Incubator. The updated list of these parties may be requested from Starten Incubator at any time.

2.3. Legal basis for processing

Starten Incubator may process User-related Personal Data if one of the following applies:

- users have given their or her or her or her for one or more specific purposes.
- the provision of the Data is necessary for the fulfillment of a contract with the User and/or any pre-contractual obligations thereof;

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- processing is necessary for the fulfilment of a legal obligation to which Starten Incubator is subject;
- the processing is related to a task that is carried out in the public interest or in the exercise of an official authorisation in which Starten Incubator is investing;
- processing is necessary for the purpose of legitimate interests pursued by the Starten Incubator or by a third party;

In any case, Starten Incubator will gladly cooperate to clarify which legal basis applies to the processing, and in particular if the provision of Data is a mandatory requirement by law or contractual, or a requirement necessary to enter into a contract.

Starten Incubator only treats Personal Data in situations where it is legally authorized or with its express and unequivocal consent of the User.

As described in this Policy, Starten Incubator has legal bases to collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control the information, modify, communicate, transfer, disseminate or extract data about the User.

Legal bases include your consent (collected expressly and unequivocally in the Consent Form), contracts and preliminary contractual procedures (in which processing is necessary to enter into the contract with the User) and legitimate interests, provided that such processing does not violate your rights and freedoms, as can be seen in the Purpose Table.

Such interests include protecting the User and Starten Incubator from threats, complying with applicable law, exercising regular rights in judicial, administrative or arbitration proceedings, enabling the conduct or administration of business, including quality control, reports and services offered, managing business transactions, understanding and improving business and customer relationships, and enabling users to find economic opportunities.

The User has the right to deny or withdraw the consent provided to Starten Incubator, when this is the legal basis for the processing of personal data, and Starten Incubator may terminate the achievement of its services for this user in the event of such request.

If you have questions about the legal bases for the collection, processing and storage of your personal data, please contact Starten Incubator and *its Data Protection Officer* at dpo@starten.global.

2.4. Place

The data is processed at the starten incubator operation centers, and anywhere else where the parties involved with the processing are located. Depending on the User's location, data transfers may involve the transfer of User Data to a country other than yourown.

2.5 . Period of conservation

Personal Data will be processed and stored for as long as necessary for the purposes for which it is collected. So:

- Personal Data collected for the purposes related to the performance of a contract between Starten Incubator ' and the User will be retained until such contract has been fully fulfilled.
- Personal Data collected for purposes related to the legitimate interests of the Starten Incubator will be retained for as long as necessary to fulfill such purposes. Users may obtain specific information about the legitimate interests pursued by the Owner within the relevant sections of this document and/or by contacting Starten Incubator at dpo@starten.global.

Starten Incubator may be allowed to retain Personal Data for a longer period of time whenever the User has given his/her consent to such processing, until such authorization has been withdrawn. In addition, Starten Incubator may be obliged to retain Personal Data for a longer period of time at all times when it is obliged to do so in order to comply with a legal obligation or in compliance with a warrant from an authority.



Once the retention period expires the Personal Data will be erased. In this way the right to access, the right to erase, the right to correct and the right to portability of the data may not have its fulfillment required after the expiration of the retention period.

2.6. Consent

When the User registers and/or fills out forms offered by Starten Incubator, including on the websites operated by the User, certain Personal Data requested will be kept confidential and will be used only for the purpose that motivated the registration.

The data will only be stored and processed with the user's free consent, as well as their full consent to the described purpose. Furthermore, personal data are treated with absolute secrecy.

Under LGPD/Brazil, CUDH (UN) and other laws on the subject, Personal Data is treated with privacy, being a fundamental right. However, fundamental rights can be diminished, provided that they are proportionate and reasonable. This policy strictly follows the dictates of the LGPD, CUDH and other laws on the subject, so the caveats to the rights provided for herein are analyzed proportionally and reasonably in each individual case.

3. USERS' RIGHTS

Users may exercise certain rights with respect to their Data processed by the Starten Incubator.

In particular, Users have the rights to do the following:

- **Withdraw your opinion at any time.** Users have the right to withdraw their order in cases where they have previously given their opinion for the processing of their Personal Data.
- **Object to the processing of your Data.** Users have the right to object to the processing of their Data if the processing is performed on a legal basis other than the application. Additional details are provided in the specific section below.
- **Access your Data.** Users have the right to know whether their Data is being processed by the Starten Incubator, obtain revelations about certain aspects of the processing and obtain a copy of the Data being processed.
- **Check and request rectification.** Users have the right to verify the accuracy of their Data and to request that it be updated or corrected.
- **Restrict the processing of your Data.** Users have the right, under certain circumstances, to restrict the processing of their Data for any purpose other than storage thereof.
- **Have your Personal Data deleted or otherwise withdrawn.** Users have the right, under certain circumstances, to obtain the deletion of their Owner Data.
- **Receive your Data and have it transferred to another controller.** Users have the right to receive their Data in a structured format, commonly used and able to be read by machines and, if technically feasible, to have it transmitted to another controller without any hindrance. This determination applies to the data being processed by automated means and that the processing is based on the User's consent, on a contract of which the User is one of the parties or by pre-contractual obligations thereof.
- **File a complaint.** Users have the right to lodge a complaint with their competent data protection authority.

The User may make the requests listed above by contacting *our Data Protection Officer* via dpo@starten.global email and these requests will be considered in accordance with applicable laws.

3.1. Details on the right to object to processing

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In cases where Personal Data is processed in the public interest, in the exercise of an official authorisation in which Starten Incubator is investing or for the purposes of the legitimate interests pursued by the Starten Incubator, Users may object to such processing by providing a reason related to their particular situation to justify the objection.

Users should know, however, that if their Personal Data is processed for direct marketing purposes, Users may object to such processing at any time without providing any justification. Users can refer to the respective sections of this document.

3.2. How to exercise these rights

Any requests to exercise the rights of Users may be directed to Starten Incubator, through the contact details provided in this document, at the end, in particular to the DPO, at dpo@starten.global. These requests may be exercised at no cost and will be met by the Owner as soon as possible and in all cases within less than one month.

4. ADDITIONAL INFORMATION ON DATA COLLECTION AND PROCESSING

4.1. Legal action

Users' Personal Data may be used for legal purposes by the Starten Incubator, in court or in the steps leading to the possible legal action arising from misuse of this policy or the functions of the platform. The User declares to be aware that Starten Incubator may be obliged to disclose Personal Data upon request of government authorities.

4.2. Additional information about The User's Personal Data

In addition to the information contained in this privacy policy, the platform may provide the User with additional and contextual information about the specific services or the collection and processing of Personal Data upon request.

4.3. System logs and maintenance

For operation and maintenance purposes, this platform and any third-party services may collect files that record the interaction with this platform (system logs) or use other Personal Data (such as IP address) for this purpose.

4.4. Information not contained in this policy

Further details on the collection or processing of Personal Data may be requested from Starten Incubator at any time through the official communication channels, at the end arranged.

5. SHARING OF PERSONAL DATA

Starten Incubator may disclose the Personal Data collected to third parties, in the following situations and to the limits required and authorized by law:

- I. with its customers and partners when necessary and/or appropriate to the provision of related services;



II. With companies and individuals hired to perform certain activities and services on behalf of Starten Incubator;

III. With group companies;

IV. With suppliers and partners to achieve the services contracted with Starten Incubator (such as information technology, accounting, among others);

V. For administrative purposes such as: research, planning, service development, security and risk management.

VI. Where necessary as a result of legal obligation, determination of competent authority, or court decision.

In the case of sharing Personal Data with third parties, all subjects mentioned in items I to VI shall use the Personal Data shared in a manner consistently and in accordance with the purposes for which it was collected (or with which the User previously consented) and in accordance with what was determined by this Privacy Policy, other privacy statements of website or countries, and all applicable privacy and data protection laws.

6. LEGAL REASONS FOR THE DISCLOSURE OF PERSONAL DATA

In certain circumstances, Starten Incubator may disclose Personal Data, to the extent necessary or appropriate, to government agencies, consultants and other third parties for the purpose of complying with applicable law or a court order or subpoena, or if Starten Incubator believes in good faith that such action is necessary to:

I. Comply with legislation requiring such disclosure;

II. Investigate, prevent or take measures related to suspected or actual illegal activities or to cooperate with public agencies or to protect national security;

III. Execution of their contracts;

IV. Investigate and defend yourself against any claims or allegations of third parties;

V. Protect the security or integrity of services (e.g., sharing with companies that are experiencing similar threats);

VI. Exercise or protect the rights, property and safety of Starten Incubator and its related companies;

VII. Protect the rights and personal safety of your employees, users, or the public;

VIII. In case of sale, purchase, merger, reorganization, liquidation or dissolution of Starten Incubator.

Starten Incubator will scientificize the respective Users about any legal demands that result in the disclosure of personal information, in accordance with what was set out in item 4, unless such scientificization is prohibited by law or prohibited by a court order or, furthermore, if the request is emergency. Starten Incubator may challenge these claims if it deems that the requests are excessive, vague or made by incompetent authorities.

7. SECURITY OF PERSONAL INFORMATION

All Personal Data will be stored in the Starten Incubator database or in a database maintained "in the cloud" by the service providers contracted by Starten Incubator, which are duly in accordance with current data legislation.

Starten Incubator and its suppliers use various security procedures to protect the confidentiality, security and integrity of your Personal Data, preventing any damages from the occurrence of such data.

Although Starten Incubator uses security measures and monitors its system to verify vulnerabilities and attacks to protect your Personal Data from unauthorized disclosure, misuse or alteration, the User understands and agrees that there are no guarantees that the information may not

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be accessed, disclosed, altered or destroyed for violation of any of the physical protections, technical or administrative.

8. CHANGES TO THIS PRIVACY POLICY

Starten Incubator reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and within the <https://starten.global> website, and/or – to the extent technically and legally feasible – by sending a notice to Users through any contact information available to Starten Incubator . It is highly recommended to check this page regularly, referring to the date of the last modification reported at the bottom. Users will be notified of the changes, so if they continue to use this platform, they will be considered tacit acceptance of the new privacy policy. If you do not agree to the new policy, you will not be able to use the Starten Incubator platform. In case of divergence between the new terms with the old ones, the new terms prevail.

9. DURATION

This Privacy Policy comes into force on 04/19/2022.

10. CONTACT

Data protection officer: dpo@starten.global.

11. MEDIATION AND ELECTION FORO

This policy is subject to the Law of the Federative Republic of Brazil and the Forum of the District of São Paulo is competent to resolve any controversy with respect to it.

12. OFFICIAL COMMUNICATION CHANNELS

Website: <https://starten.global>

Instagram: https://www.instagram.com/starten_global/

Facebook: <https://www.facebook.com/Starten-Incubadora>

Linkedin: <https://www.linkedin.com/starten-incubadora>