



PRIVACY POLICY

This Privacy Policy refers to the processing of data collected by the Starten Platform, referring to the website <https://starten.global>, 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 legislation on data processing and protection.

Starten values the privacy of its users and has created this Privacy Policy to demonstrate its commitment to protecting your privacy and your personal data, in accordance with national and international legislation on the protection of personal data, as well as describing how your privacy is protected by Starten when collecting, processing and storing your personal information.

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

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

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

1. Definitions

User: all individuals and/or legal entities that will use or visit the Starten website and incubation form, fully capable of performing acts of civil life or those who are absolutely or relatively incapable, duly represented or assisted.

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

Purpose: the objective and purpose that Starten wants 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 basis: legal basis that makes the processing of personal data for a certain prior purpose by Starten legitimate.

Consent: express and unequivocal authorization given by the User holding the personal data for Starten to process their 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

In accordance with the provisions of the General Personal Data Protection Law (LGPD/Brasil), the owner responsible for data processing is Starten.

2.1. Types of Data 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 explanatory text displayed prior to Data collection.

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

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

Users who have questions about which Personal Data are mandatory are invited to contact the DPO (data protection officer) by email: dpo@starten.global.

Any use of cookies – or other tracking tools on this platform – is for the purpose of carrying out the actions provided for in our forms.

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

2.2. processing method

Starten 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 enabled IT tools, following organizational procedures and means strictly related to the purposes indicated in the forms. In addition to Starten, in some cases, the Data may be accessed by certain types of persons in charge involved with the operation of the platform (administration, sales, marketing, legal system administration, legal and other departments of Starten) or external persons (such as third-party technical service providers, postmen, hosting providers, IT companies, communication agencies) appointed, when necessary, as Data Processors by Starten. The updated list of these parts may be requested from Starten at any time.

2.3. Legal basis for processing

Starten may process Personal Data relating to the User if one of the following applies:

- Users have given their consent 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 of the same;
- the processing is necessary for the fulfillment of a legal obligation to which Starten is subject;
- the processing is related to a task that is performed in the public interest or in the exercise of an official authorization in which Starten is invested;
- processing is necessary for the purpose of legitimate interests pursued by Starten or a third party;



In any case, Starten 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 contract, or a necessary requirement to enter into a contract.

Starten only processes Personal Data in situations where it is legally authorized or with the User's express and unequivocal consent.

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

The legal bases include your consent (expressly and unequivocally collected in the Consent Form), contracts and preliminary contractual procedures (where 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 Table of Purposes.

Such interests include protecting the User and Starten from threats, complying with applicable legislation, regularly exercising rights in judicial, administrative or arbitration proceedings, enabling the performance or administration of business, including quality control, reports and services offered, managing transactions businesses, understand and improve business and customer relationships, and enable users to find economic opportunities.

The User has the right to deny or withdraw the consent provided to Starten, when this is the legal basis for processing personal data, and Starten may terminate the performance 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 and its Data Protection Officer through the email dpo@starten.global.

2.4. Place

The data is processed at Starten's headquarters of operation, and in any other places 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 your own.

2.5. conservation period

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

- The Personal Data collected for the purposes related to the performance of a contract between Starten' and the User will be kept until such contract has been completely fulfilled.
- Personal Data collected for purposes related to the legitimate interests of Starten will be kept 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 at dpo@starten.global.

Starten may be allowed to keep Personal Data for a longer period whenever the User has given his authorization for such processing, as long as such authorization has not been withdrawn. In addition, Starten may be obliged to keep Personal Data for a longer period on all occasions when it is obliged to do so in order to comply with a legal obligation or in compliance with a mandate from an authority.

As soon as the retention period expires, Personal Data will be deleted. In this way, the right to access, the right to erase, the right to correct and the right to data portability cannot be enforced after the expiration of the retention period.

2.6. Consent



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

The data will only be stored and processed with the free consent of the user, as well as his full consent to the purpose described. Furthermore, personal data are treated with absolute confidentiality.

Under the terms of the LGPD/Brasil, the CUDH (UN) and other laws on the subject, Personal Data is treated with privacy, being a fundamental right. However, fundamental rights can be diminished, as long as it is proportionate and reasonable. This policy strictly follows the dictates of the LGPD, CUDH and other laws on the subject, so the reservations to the rights provided herein are analyzed proportionately and reasonably in each specific case.

3. USER RIGHTS

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

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

- Withdraw your consent at any time. Users have the right to withdraw their consent in cases where they have previously given their consent 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 carried out on a legal basis other than consent. 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 Starten, to obtain disclosures about certain aspects of the treatment and to obtain a copy of the Data being processed.
- Check and ask for rectification. Users have the right to verify the accuracy of their Data and to request that they 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 their storage.
- Have your Personal Data deleted or otherwise removed. 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 it is technically feasible, to have them transmitted to another controller without any hindrance. This determination applies subject to the Data being processed by automated means and that the processing is based on the User's consent, on a contract to which the User is one of the parties or on the User's pre-contractual obligations.
- File a complaint. Users have the right to file a complaint with their competent data protection authority.

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

3.1. Details about the right to object to processing

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

Users should be aware, 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 may refer to the respective sections of this document.



3.2. How to exercise these rights

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

4. ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING

4.1. legal action

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

More details about the collection or processing of Personal Data can be requested from Starten, at any time, through the official communication channels, at the end.

5. SHARING OF PERSONAL DATA

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

- I. With its customers and partners when necessary and/or appropriate for the provision of related services;
- II. With companies and individuals hired to perform certain activities and services on behalf of Starten;
- III. With group companies;
- IV. With suppliers and partners to perform the services contracted with Starten (such as information technology, accounting, among others);
- V. For administrative purposes such as: research, planning, service development, security and risk management.
- VI. When necessary as a result of legal obligation, determination of competent authority, or judicial decision.



In the event of sharing Personal Data with third parties, all subjects mentioned in items I to VI must use the Personal Data shared consistently and in accordance with the purposes for which they were collected (or to which the User previously consented) and as determined by this Privacy Policy, other website or country privacy statements, and all applicable privacy and data protection laws.

6. LEGAL REASONS FOR THE DISCLOSURE OF PERSONAL DATA

In certain circumstances, Starten 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 with a court order or subpoena, or if Starten believes good faith that such action is necessary to:

- I. Comply with legislation that requires such disclosure;
- II. Investigate, prevent or take action related to suspected or actual illegal activities or to cooperate with public bodies or to protect national security;
- III. Execution of its contracts;
- IV. Investigate and defend against any third-party claims or allegations;
- V. Protect the security or integrity of the services (for example, sharing with companies that are experiencing similar threats);
- VI. Exercise or protect the rights, property and safety of Starten and its affiliated companies;
- VII. Protect the rights and personal safety of its employees, users or the public;
- VIII. In the event of the sale, purchase, merger, reorganization, liquidation or dissolution of Starten.

Starten will inform the respective Users of any legal demands that result in the disclosure of personal information, in accordance with what was exposed in item 4, unless such notification is prohibited by law or prohibited by a court order, or even if the request is emergency. Starten may contest these demands if it deems the requests to be excessive, vague or made by incompetent authorities.

7. SECURITY OF PERSONAL INFORMATION

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

Starten and its suppliers use various security procedures to protect the confidentiality, security and integrity of your Personal Data, preventing the occurrence of possible damages due to the processing of this data.

Although Starten uses security measures and monitors its system for vulnerabilities and attacks to protect its Personal Data against unauthorized disclosure, misuse or alteration, the User understands and agrees that there is no guarantee that the information will not be accessible, disclosed, altered or destroyed for breach of any of the physical, technical or administrative safeguards.

8. CHANGES TO THIS PRIVACY POLICY

Starten reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and within the website <https://starten.global>, and/or – to the extent technically and legally feasible – sending notice to Users through any contact information available to Starten. It is highly recommended to check this page regularly, referring to the Last Modified Date at the bottom. Users will be notified of the changes, so if they continue to use this platform, tacit acceptance of the new privacy policy will be considered. If the user does not agree with the new policy, he will not be



able to use the Starten platform. In case of divergence between the new terms and the old ones, the new terms prevail.

9. VALIDITY

This Privacy Policy takes effect on 04/19/2022.

10. CONTACT

Data Protection Officer: dpo@starten.global.

11. MEDIATION AND ELECTION JURISDICTION

This policy is subject to the Law of the Federative Republic of Brazil and the São Paulo District Court is competent to settle any dispute in relation 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>