

# PRIVACY POLICY

Startup Hansa (“we”, or “us”) recognizes the importance of privacy. We want you to feel confident using our Website, and this privacy policy (“Policy”) is to help you understand and describe how we collect, use, and disclose information that we obtain about users of our Website.

## 1. INFORMATION WE COLLECT

We collect information about you directly from you and automatically through your use of our Website. We may combine information automatically collected with other information that we have collected about you.

In order to help you protect yourself and your information, we encourage you to provide only that information that is necessary for using our Website.

If you or any other user of the Website sends an email or provides an email address to Startup Hansa for any reason, we reserve the right to retain that email address to use to send future notifications in accordance with this Privacy Policy.

## 2. COOKIES

Cookies are small text files that are placed on your computer’s hard drive to identify your computer to our servers. If your browser is configured to accept cookies, we will use cookies to recognize your computer when you visit the Website so that we can provide you with a more personalized and streamlined experience and improve the quality of the Website. If you wish, you can configure your browser to block cookies.

Advertisements of third-party advertisers may be displayed on the Website. If you choose to click on a third-party advertisement or link, we may provide non-personally identifiable information to the owning advertiser, advertising network and/or web publisher. Also, any such advertiser, advertising network or web publisher may use cookies or other technologies to collect information when you are visiting their web sites. The information advertisers or other third parties collect is governed by their individual privacy policies. Neoteric does not take responsibility nor can guarantee the content of such third-party privacy policies.

## 3. USE OF YOUR INFORMATION

We may use information that we collect about you, including personal information, to:

1. Understand and improve our products. We will perform research and analysis about your use of, or interest in, our products, services, or content, or

products, services or content offered by others. We do this to help make our products better and to develop new products.

2. Communicate with you.
3. Service related communications. We may send you service and administrative emails to ensure the Website is working properly.
4. Promotional. We may send you emails about new product features or other news about Neoteric or on topics we think would be relevant to you. You may opt out of these at any time.
5. Responding to your requests. We will also use your information to respond to your questions or comments.
6. Administrative. We may contact you to inform you about changes in our services, our service offering and other important service related notices, such as changes to the Policy or about security or fraud notices.
7. Advertising. We may develop and display content and advertising tailored to you.
8. Protecting Rights and Interests. We will use your information to protect our rights and interests as well as the rights and interests of our users and any other person, as well as to enforce this Policy.
9. Legal Compliance. We may use your information to comply with applicable legal or regulatory obligations, including informal requests from law enforcement or other governmental authorities.
10. Other. We also may use your information to manage our business or perform functions as otherwise described to you at the time of collection.

#### **4. SHARING AND DISCLOSURE**

We do not share your personal information with others except as indicated within this Policy or when we inform you and give you an opportunity to opt out of having your personal information shared.

We will share information we collect about you, including personal information, in the following ways:

1. With third party service providers, agents, or contractors. We will never sell your data to third parties. However, we use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with providing services to you. For example, we may engage Service Providers to provide services such as marketing, advertising, communications, infrastructure and IT services, to provide customer service, to collect debts, and to analyze and enhance data (including data about

users' interactions with our Website). These Service Providers may have access to your personal or other information in order to provide these functions. In addition, some of the information we request may be collected by third party providers on our behalf. We require our service providers to agree to take reasonable steps to keep the personal information that we provide to them secure. We do not authorize them to use or disclose your personal information except in connection with providing their services.

2. **Affiliates.** We may disclose your information to current or future affiliates or subsidiaries for research, marketing, and other purposes consistent with this Privacy Policy.
3. **To comply with the legal process or to protect Startup Hansa and our users and members.** If we believe that disclosure is reasonably necessary to comply with a law, regulation, legal or governmental request; to respond to a subpoena, court order, warrant, or other legal process; to enforce applicable terms of use or this Policy, including investigation of potential violations thereof; to protect the safety, rights, or property of the public, any person, or Startup Hansa; to detect, prevent, or otherwise address, security, or technical issues or illegal or suspected illegal activities (including fraud); or as evidence in litigation in which we are involved, as part of a judicial or regulatory proceeding.
4. **Business Transfers.** We may engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of the information described in this Policy. In such transitions, customer information is typically one of the business assets that is transferred or acquired by a third party. If we are acquired by or merged with another company, if we sell or transfer a business unit or assets to another company, in the unlikely event of a bankruptcy proceeding, or as part of any other similar business transfer, you acknowledge that such transfers may occur.
5. **Aggregate or De-identified Information.** We may disclose aggregate, anonymous, or de-identified information about users for marketing, advertising, research, compliance, or other purposes.

## **5. CHOICE**

1. **E-mail.** If you do not wish to receive promotional e-mails from us, you may opt out at any time by following the opt-out link contained in the email itself. Please note that it may take up to ten (10) days to process your request.

2. Cookies. Your browser's help function should contain instructions on how to set your computer to accept all cookies, to notify you when a cookie is issued, or to not receive cookies at any time.

## **6. SECURITY**

Startup Hansa uses robust security measures to protect Data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of Data. When the Services are accessed using the Internet, Transport Layer Security(TLS) technology protects Customer Data using both server authentication and data encryption. These technologies help ensure that Customer Data is safe, secure, and only available to the Customer to whom the information belongs and those to whom the Customer has granted access. Neoteric also implements other advanced technology measures to prevent interference or access from outside intruders. Startup Hansa offers enhanced security features within the Services that permit Clients to configure security settings to the level they deem necessary, such as forced password changes and IP-restrictions.

## **7. RIGHTS TO ACCESS AND CONTROL YOUR PERSONAL DATA**

For personal data that we have about you:

1. Delete Data: You can ask us to erase or delete all or some of your personal data.
2. Change or Correct Data: You can edit your personal data. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
3. Object to, or Limit or Restrict, Use of Data: You can ask us to stop using all or some of your personal data.
4. Right to Access and/or Take Your Data: You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

We retain your personal data while your account is in existence or as needed to provide you Newsletter. This includes data you or others provided to us and data generated or inferred from your use of our Website. In some cases we choose to retain certain information in a depersonalized or aggregated form.

## **8. THIRD-PARTY LINKS**

Our Website may contain links to third-party websites and applications. Any access to and use of such linked websites and applications is not governed by this Policy but

instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third-party websites or applications.

## **9. LAWFUL BASES FOR PROCESSING**

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you and legitimate interests.

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer. You have also the right to lodge a complaint with the supervisory authority.

## **10. CHANGES TO THE POLICY**

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, and if we do we'll post any changes, including any material changes, on this page, so please be sure to check back periodically. If you continue to use Startup Hansa after those changes are in effect, you agree to the revised Policy.