

# Privacy Policy

**MAKI Ventures Oy (“MAKI.VC”, or “we”) collects and processes personal data of users of our online services and website. This Privacy Policy applies to personal data we obtain from individuals (“Users”) through our websites, online services, and web-based applications (collectively, the “Services”). In regard to this data we shall be acting as a data controller in the meaning of the EU data protection legislation.**

Some of our services might be subject to a separate privacy policy. If a separate privacy policy applies to a particular service, we will post it on the relevant website or otherwise make it available in connection with the service in question.

Our Privacy Policy explains what data we process, how we do that and how the data subjects, i.e. Users, may use their rights (e.g. right to object, right of access).

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on our website. We will not make substantial changes to this Privacy Policy or reduce the rights of Users under this Privacy Policy without providing a notice thereof.

This Privacy Policy only covers data processing carried out by MAKI.VC. The Privacy Policy does not address, and we are not responsible for, the privacy practices of any third parties. MAKI.VC disclaims all responsibility for the processing carried out by third parties, also in cases where Services include hyperlinks or other links to third parties’ websites or services.

Privacy, security and online safety are important for us, and we process all personal data with due care and in accordance with applicable laws and regulations.

## **1. MAKI.VC'S CONTACT DETAILS**

**Name:** MAKI Ventures Oy  
**Company ID:** 2836971-5  
**Correspondence address:** Lapinlahdenkatu 16, 00180 Helsinki, Finland  
**E-mail address:** lets@maki.vc  
**Website:** www.maki.vc

## **2. PERSONAL DATA PROCESSED AND SOURCES OF DATA**

We collect the following information types of the Users:

(i) User Data; and (ii) Technical Data. Although we do not normally use Technical Data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with User Data. In such situations, Technical Data can also be considered to be personal data under applicable laws and we will treat the combined data as personal data.

During the User's use of the Services, MAKI.VC may collect and process for example the following User Data from Users: (i) first and last name; (ii) e-mail address; (iii) phone number; (iv) Name and information regarding the organization the User represents; (v) information that Users provide when rating our Services or giving feedback on our Services; (vi) any other personal data Users may provide themselves.

The specific kind of User Data collected will depend on the Services used. User Data is received directly from Users.

Technical Data may include for example the following data (i) User's IP address; (ii) browser type and version; (iii) preferred language; (iv) geographical location using IP address or the GPS, wireless, or Bluetooth technology on your device; (v) operating system and computer platform; (vi) the full Uniform Resource Locator (URL) clickstream to, through, and from our Services, including date and time; and (vii) areas of our Services User has visited.

### **Cookies**

We use various technologies to collect and store Technical Data and other information when Users visit our Services, including cookies. Cookies allow us to calculate the aggregate number of people visiting our Services and monitor the use of the Services. This helps us to improve our Services and better serve our Users. We may also use cookies that make the use of the Services easier, for example by remembering usernames, passwords and preferences. We may use tracking and analytics cookies to see how well our Services are being received by our Users, and use unique cookie identifiers for tracking purposes.

Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. This can usually be done through Internet browser's settings. Information about how to manage cookies can be found online.

Please note that some parts of our Services may not function properly if use of cookies is refused.

### **Google Analytics**

Our Services use web analytics services to compile Technical Data and reports on visitor usage and to help us improve our Services. For an overview of Google Analytics, please visit Google Analytics.

### **Hubspot**

Our Services use Hubspot is used for the tracking and analytics of website traffic and visitor data.  
For more information regarding the Hubspot privacy please visit <https://legal.hubspot.com/data-privacy>

## **3. PURPOSES AND LEGITIMATE GROUNDS FOR PROCESSING OF PERSONAL DATA**

### **Purposes**

There are several purposes for the processing of personal data by MAKI.VC:

#### **To provide our Services and carry out our contractual obligations**

We process personal data in the first place to be able to offer the Services to Users and to run, maintain and develop our business. We process and use personal data for example to provide essential functionalities for customers and Users, i.e. in order to match customers with Users and vice versa. In some cases, personal data may be processed in order to carry out our contractual obligations towards the User. We may use the data for example to offer essential functionalities of the Services and to provide access to the Services. If User contacts our customer service, we will use the provided information for answering questions and solving possible issues.

#### **For customer communication**

We may process personal data for the purpose of contacting Users regarding our Services and to inform Users of changes in our Services. Data may also be used for research and analysis purposes in order to improve our Services.

#### **For quality improvement and trend analysis**

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

#### **For statistical and analytical purposes**

MAKI.VC may gather Technical Data and other anonymous and aggregate data in order to generate reports and statistics. We may use statistics and reports for sales and marketing purposes. In addition, we may provide customers and Users with the aforementioned statistics and reports. For clarity, such statistics and reports do not include any personal data.

#### **For other legitimate purposes**

We process personal data for the purposes of direct marketing, such as the sending of newsletters or similar marketing material. Users can unsubscribe from receiving such material at any time.

In some parts of the Services, Users may be requested to grant their consent for the processing of personal data. In this event, Users may withdraw their consent at any time.

### **4. TRANSFER TO COUNTRIES OUTSIDE EUROPE**

The data handled within our service platform for investors and founders is stored within the EU/EEA.

For our website functions we use service providers in several geographical locations, such as Google Analytics and Hubspot. As such, we and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile. We will take steps to ensure that Users' personal data receives an adequate level of protection in the jurisdictions in which we process it. We provide adequate protection for the transfer of personal data to countries outside of the European Economic Area through a series of intercompany agreements and agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements.

More information regarding the transfers of personal data may be obtained by contacting us on addresses mentioned in this Privacy Policy.

### **5. RECIPIENTS**

We only share personal data within the organisation of MAKI.VC if and as far as reasonably necessary to perform and develop our Services.

We do not share personal data with third parties outside of MAKI.VC's organization unless one of the following circumstances applies:

#### **It is necessary for the purposes set out in this Privacy Policy**

To the extent that third parties need access to personal data to perform the Services, MAKI.VC has taken appropriate contractual and organisational measures to ensure that personal data are processed exclusively for the purposes specified in this Privacy Policy and in accordance with all applicable laws and regulations.

#### **For legal reasons**

We may share personal data with third parties outside MAKI.VC's organization 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 MAKI.VC, our Users or the public in accordance with the law. When possible, we will inform Users about such transfer and processing.

#### **To authorized service providers**

We may share personal data to authorized service providers who perform services for us (including data storage, sales, payment service, marketing and customer support service providers). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy. Please bear in mind that if you provide personal data directly to a third party, such as through a link on our website, the processing is typically based on their policies and standards.

#### **For other legitimate reasons**

If MAKI.VC is involved in a merger, acquisition or asset sale, we may transfer personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all Users concerned when the personal data are transferred or become subject to a different privacy policy as soon as reasonably possible.

#### **With explicit consent**

We may share personal data with third parties outside MAKI.VC's organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so.

Due to the functionalities of our Services, personal data of a User might be transferred to MAKI.VC's customers. When a customer searches for suitable employees, only the current title, domicile and competences of the relevant User are visible to the customer. In order to apply for a certain position or to submit an application to certain customer, User is required to give a consent for the transfer of User's personal data to said customer. The User shall remain anonymous until the User has separately consented to the transfer of User's identification and personal data to a certain customer. By giving the consents and permissions, User warrants and represents that User is allowed and permitted to give such consents and permissions.

## **6. STORAGE PERIOD**

MAKI.VC does not store personal data longer than is legally permitted and necessary for the purposes of providing the Services or the relevant parts thereof. The storage period depends on the nature of the information and the purposes of processing. The maximum period may therefore vary per use.

Typically, we will store User's personal data for as long as the User is a registered subscriber or a registered user of our Services or for as long as we have another purpose to do so and, thereafter, for no longer than is required or permitted by law or reasonably necessary for internal reporting and reconciliation purposes.

In general, personal data of Users are deleted within reasonable time after the User no longer uses any part of the Services or when the User makes a request regarding deletion of User's personal data.

## **7. USERS' RIGHTS**

#### **Right to access**

MAKI.VC offers access for the Users to the personal data processed by MAKI.VC. This means that Users may contact us and we will inform what personal data we have collected and processed regarding the said User and the purposes such data are used for.

#### **Right to withdraw consent**

In case the processing is based on a consent granted by User, User may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use our Services.

#### **Right to correct**

Users have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored about the User corrected or completed.

#### **Right to deletion**

Users may also ask us to delete the User's personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data. We may not immediately be able to delete all residual copies from our servers and backup systems after the active data have been deleted. Such copies shall be deleted as soon as reasonably possible.

#### **Right to object**

Users may object to certain use of personal data if such data are processed for other purposes than purposes necessary for the performance of our Services to the User or for compliance with a legal obligation.

Users may also object any further processing of personal data after prior given consent. If User objects the further processing of personal data, this may lead to fewer possibilities to use our Services.

Notwithstanding any consent granted beforehand for the purposes of direct marketing, User has the right to prohibit us from using User's personal data for direct marketing purposes, market research and profiling by contacting us on the addresses indicated above or by using the functionalities of the Services or the unsubscribe possibility offered in connection with any direct marketing messages.

#### **Right to restriction of processing**

Users may request us to restrict certain processing of personal data, this may however lead to fewer possibilities to use our Services.

#### **Right to data portability**

Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

#### **How to use the rights**

The above mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above, including the following information: name, address, phone number and a copy of a valid ID. We may request the provision of additional information necessary to confirm the identity of the User.

We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

## **8. LODGING A COMPLAINT**

In case User considers our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection.

## **9. INFORMATION SECURITY**

It is our responsibility to protect our platform and data with best possible solutions.

We take all reasonable and appropriate security measures to protect the personal data we store and process from unauthorised access or unauthorised alteration, disclosure or destruction. Measures include for example, end-to-end TLS communication encryption and encryption of sensitive user information. We monitor data security threats and solutions, and take them into account in our platform solutions and architecture.

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our websites, data centres, systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects to the privacy of Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as reasonably possible.

For more information, contact us at [lets@maki.vc](mailto:lets@maki.vc)