

PRIVACY POLICY

1. GENERAL INFORMATION

- 1.1 This privacy notice describes how Ignt SWE AB (“**Ignite**”, “**we**”, “**us**”, “**our**”), collects, uses and processes personal data. At the bottom of this text you will find information about cookies.
- 1.2 Ignite provides a program named Ignite Sweden. We function autonomically and act as a personal data controller in our own right. Our contact details are set out below in section 10.
- 1.3 Our vision is to *“transform innovation in small companies into large-scale value creation through collaboration with corporates”*, and in doing so, bolster Swedish industry so that we as a community remain competitive at an international level. Our activities therefore include connecting startups with established companies, which means that we are using contact details to persons to facilitate such connections.
- 1.4 We operate <https://ignitesweden.org/> (the “**Website**”) and the online platform called “**Magic**”, a managing tool for our events, at <https://ignitemagic.org/>.

2. PERSONAL DATA THAT WE PROCESS

- 2.1 When browsing the Website and using Magic, pursuant to your consent thereto, we process “**Cookies**”:
 - (a) cookie identifiers from Google cookies (Website and Magic); and
 - (b) a cookie from Cloudflare which collects and one-way hashes your IP address (Magic).
- 2.2 When using forms on the Website to contact us, and/or managing contracts, we process “**Contact Information**”:
 - (a) your first and last name;
 - (b) your email address;
 - (c) your telephone number;
 - (d) your company or organisation; and
 - (e) any personal data you include in your messages to us.
- 2.3 If you have connected with us and represent a company or organisation, or participated other activities arranged by us, we process “**Photos and Videos**”:
 - (a) your portrait, or other photographs where you can be recognised; and
 - (b) we may also film videos of our events, where you may be included in the material.

- 2.4 Personal data is processed in Magic, namely **“Platform Information”**:
- (a) your first and last name;
 - (b) your email address;
 - (c) your telephone number; and
 - (d) a link to your LinkedIn profile.
- 2.5 When handling payments, money and funding, we process **“Payment Information”**:
- (a) name referenced on the invoice;
 - (b) bank details, if the payee is a natural person; and
 - (c) information related to funding from Vinnova.
- 2.6 Contact Information is required in order to contact us, Platform Information is required to set up a contact profile on Magic (the link to LinkedIn is however optional), and Payment Information is required for us to process funding requests and payments.
- 2.7 Kindly note that we may receive Platform Information by other parties than directly from you – such parties would be the company at which you work, that would provide us with the Platform Information regarding you when it manages its account and profile on Magic. Please refer to such companies for information about how they process personal data relating to you. For the avoidance of doubt, such companies are controllers in their own right for their use of personal data relating to you – e.g. uploading, updating, and deleting it – as we do not have the means or capacity to keep all Platform Information updated and relevant on Magic. We will however access the Platform Information and use it for the purposes set out below.

3. PURPOSES OF THE PROCESSING

PURPOSE	PERSONAL DATA	LEGAL GROUND
Analysing the traffic of visitors on our Website.	Cookies (Google Analytics)	Consent
The Cloudflare cookie (_cfduid) detects malicious visitors to Magic and minimizes blocking of legitimate users.	Cookies (Cloudflare)	Consent
To communicate with you	Contact Information	Our legitimate interest to meet new people and make new connections.
Photos and videos will be taken during our	Photos and Videos	Our legitimate interest to show the great people

<p>events, which will be used for editorial use (i.e. to fill our Website with content and testimonials) and for marketing purposes (i.e. advertising and social media). The Photos may be used together with your name and the name of the company you work for.</p>		<p>around us, and tell a better story of what we are doing.</p>
<p>To manage contracts (internal use)</p>	<p>Contact Information</p>	<p>The contract between us (Ignite Sweden Terms of Service) (if we have a contract with you) or our legitimate interest in managing our agreements with our customers (if we have a contract with a company where you for example are employed).</p>
<p>To manage contracts (for funding purposes)</p>	<p>Contact Information</p>	<p>Our legitimate interest to secure funding from Vinnova.</p>
<p>To operate Magic</p>	<p>Platform Information</p>	<p>Our legitimate interest of building and nurturing a strong and competitive hardware and industry focused startup and corporate community.</p>
<p>To facilitate connections between startups and companies (i.e. matching startups with companies, organising events, matchmaking opportunities, booking meetings, etc.).</p>	<p>Platform Information</p>	<p>Our legitimate interest of building and nurturing a strong and competitive hardware and industry focused startup and corporate community.</p>
<p>To process payments and organise invoices.</p>	<p>Payment Information</p>	<p>Our legitimate interest of receiving payments and organising our invoices.</p>
<p>By analysing which companies and startups we are dealing with, and what roles they find</p>	<p>Contact Information, Platform Information, Cookies.</p>	<p>Our legitimate interest of improving our services and offerings.</p>

suitable to engage with us, we make decisions on how to develop and improve our business.		
To comply with applicable laws, such as bookkeeping legislation, when verifying a person's identity before providing it with access to personal data held by us, or when responding to requests from authorities and law enforcement agencies.	All types of data.	Legal obligations, as applicable.

3.1 Removing Photos and Videos.

By signing up for our events, we take it that you are comfortable with being seen in connection with attending them. If you are not comfortable with being photographed at an event, we will of course respect this. If you have changed your mind and no longer want to appear in Photos and Videos, please contact us at info@ignitesweden.org. Please note that Photos and Videos will in such case not be used in future publications, but may continue appear in publications already in circulation.

3.2 Legitimate Interest

- 3.2.1 We process personal data on the basis of our legitimate interests only after conducting a balance assessment where we consider (i) our legitimate interests, (ii) your interests, rights and freedoms and (iii) the necessity of processing.
- 3.2.2 Our vision is to *"transform innovation in small companies into large-scale value creation through collaboration with corporates"* and in doing so, bolster Swedish industry so that we as a community remain competitive at an international level. Therefore, our legitimate interest lays in building and nurturing a strong and competitive hardware and industry focused startup and corporate community.
- 3.2.3 We strive to balance the individuals' interests, rights and freedoms in relation to our legitimate interests, which we deem necessary and only carry out in accordance with what is outlined in this policy. For more information on how we have carried out our legitimate interest assessments, please contact us using the details set out below.

4. OTHER PARTIES WITH ACCESS TO PERSONAL DATA

Since one of our main activities is to connect startups with companies, we share personal data to other parties when facilitating connections and arranging events. Therefore, Contact Information and Platform Information will be shared to startups, companies, and as necessary, to parties which are arranging events (for instance,

when there is a guest list). If you apply for funding as a startup, we will share personal data to Vinnova. These recipients of personal data will process it as independent controllers, in accordance with their own privacy notices.

4.1 Service providers

4.1.1 We use service providers for some activities, so that we can focus on our main activities. Service providers are contractually obligated to only process personal data in accordance with our instructions. We currently use:

- Scrive for managing signatures on requests for funding from Vinnova;
- Zapier for sending email addresses to Scrive;
- MergeMail for sending emails;
- Sendgrid for sending emails from Magic;
- Mailchimp for sending newsletters;
- Google Workspace to monitor signature statuses; and
- Monday to manage customer relations.

4.2 The following service providers below are located outside the EU/EEA and we are therefore applying specified safeguards for the data transfers as set forth in the table below. You can acquire further information regarding the transfer by contacting us at info@ignitesweden.org.

Google LLC.	USA	Standard Contractual Clauses
Zapier	USA	Standard Contractual Clauses
Sendgrid	USA	EU – U.S. Data Privacy Framework, Twilio Binding Corporate Rules, EU Standard Contractual Clauses as applicable.
Mailchimp	USA	Standard Contractual Clauses
Monday	Israel	Standard Contractual Clauses

4.3 When visiting our Website and using Magic you may be directed to other websites where the personal data collected is not in our control. The privacy policy of the other website will govern the personal data obtained from you on that website.

5. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM

We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

6. RETENTION

We store your personal data in accordance with the following retention times:

Cookies	One year after the membership has been terminated.
Contact Information	
Photos and Videos	
Platform Information	
Payment Information	In accordance with applicable legislation, which means that bookkeeping materials are stored for the current calendar year and seven years thereafter.

7. YOUR RIGHTS

- 7.1 You have the right to withdraw your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing.
- 7.2 You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to. You also have the right to object to our processing of personal data relating to you which is based on our legitimate interests.

8. CHANGE OF CONTROL

If there is a change of control in our business, we may transfer your information to the new owners for them to continue to provide the services we provide. The new owners shall continue to comply with the commitments we have made in this Privacy Policy.

9. NOTICE OF CHANGES TO THE PRIVACY POLICY

If we make changes to this privacy notice, we will post an updated version on our website, and if we deem the changes to be of more significant nature, we will notify you by email. If your consent is required due to the changes, we will provide you additional prominent notice as appropriate under the circumstances and, ask for your consent in accordance with applicable law.

10. CONTACT INFORMATION

10.1 To exercise your rights, or if you have any questions regarding our processing of your personal data, please contact at info@ignitesweden.org. Kindly note that we will need to take further measures to verify your identify, if necessary, before processing any requests.

10.2 Our full contact details are:

Ignt SWE AB (company registration number 559492-2964)
c/o SISP Service and Development,
Mäster Samuelsgatan 56, 101 58 Stockholm

10.3 If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.