

# Privacy Policy

INTERNETSIA, S.L. (hereinafter, ISDI Accelerator) is committed to protecting your privacy. This Privacy Policy describes how we collect, use and share data, and what choices you have with respect to your data.

## 1. Who is responsible for the processing of your personal data?

Entity: Internetsia, S.L. (ISDI Accelerator)

Address: c/ Viriato 20 – Bajo; 28010 de Madrid (España)

CIF: B85663359

Telf. (0034) 91 737 39 25

Email: info-accelerator@isdi.education

Data protection: dpo@isdi.education

## 2. How do we collect personal data?

As a result of the use of certain functionalities of the Web, you agree to provide certain personal data that will be incorporated into ISDI Accelerator files for processing. Specifically, ISDI Accelerator will collect the following information:

- Personal data that you provide through forms: ISDI Accelerator collects personal data from the User when you voluntarily provide such information (name, surname, ID, date of birth, email, telephone, etc.).
- Business contact information, such as professional background, areas of expertise, mentoring experience, etc.
- Feedback and correspondence, such as information you provide in your responses to surveys, report a problem with the Website, receive customer support or otherwise correspond with ISDI Accelerator by sending an email to addresses @isdi.education.
- Marketing information, such as your preferences for receiving communications (newsletter) and details about how you engage with them.

Please bear in mind that when ask to fill in your personal data to gain access to some functionality or service of the Website, some fields may be marked as mandatory, since it is data that ISDI Accelerator needs in order to provide the service or give you access to the functionality in question. Please note that, if you decide not to provide us with this information, you may not be able to complete your registration or you may not be able to enjoy these services or features.

### 3. Purposes of the processing:

ISDI Accelerator will process user data for the following specific purposes:

- If you are an investor and are signing up to receive updates on startups and projects that match your portfolio, you will be asked to provide certain personal data and other information that we will use to add you to our investors database and get a better sense of the type of projects you may be interested in.
- If you are a mentor and are signing up to participate as a mentor in future programs, you will be asked to provide certain personal data and other information that we will use to add you to our mentoring database and send you updates about the programs run by ISDI Accelerator.
- If you register on our Website, we may send you newsletters and other promotional materials, including communications that may be targeted to you based on your personal information, as permitted by law.

ISDI Accelerator will carry out actions to monitor and control the use of the Website in order to prevent and detect any fraudulent use (such as technical manipulations, code modifications ...), in order to avoid, prevent and / or detect any unauthorized access, alteration or loss of information related to third parties other than the user that may generate civil, criminal and / or administrative responsibilities for ISDI Accelerator.

### 4. How do we share your information?

In order to fulfill the purposes indicated in this Privacy Policy and duly manage the service the personal data of its customers, ISDI Accelerator will have the collaboration of third party service providers who can access their personal data and who will treat the aforementioned data in the name and on behalf of ISDI Accelerator as a result of its provision of services.

ISDI Accelerator undertakes to sign with them the corresponding data processing contract, through which it will impose, among others, the following obligations: apply appropriate technical and organizational measures; treat personal data for the agreed purposes and only following the documented instructions of ISDI Accelerator; and delete or return the data to ISDI Accelerator once the provision of services ends.

### 5. Legal basis

The legal basis for processing your data for the purposes of joining the mentoring and/or investors database is the given consent when you fill out the sign up form.

The legal basis for processing your data for subscribing to our newsletter is the given consent.

We consider that we have a legitimate interest to attend to the requests or queries that you raise through the various existing means of contact. We understand that the processing of this data is also beneficial for you as it allows us to properly assist you and resolve the questions raised. When your query is related to the exercise of the rights we detail below, or with claims related to our services, the legal basis for processing your data is the fulfillment of legal obligations on our part.

## 6. Retention period

The retention period of your data will depend on the purposes for which it was collected:

- In the case of Mentors and Investors, until the User revokes the given consent for their treatment.
- In the case of the newsletter and other marketing communications, until the User revokes the given consent.
- In the case of the contact form or any other email communication, for the time needed to correctly respond to your request.

However, the data may be maintained by ISDI Accelerator to attend the possible responsibilities arising from the treatment and only during the limitation period of said responsibilities. After the aforementioned deadlines, personal data will be deleted by ISDI Accelerator.

## 7. What are your rights?

We promise to respect the confidentiality of your personal data and to guarantee the exercise of your rights. ISDI Accelerator has agreed that you can exercise them at no cost by writing an email to the email address [info-accelerator@isdi.education](mailto:info-accelerator@isdi.education), simply indicating the reason for your request and the right you want to exercise. If we consider that it is necessary to identify you, we may request a copy of a document proving your identity. The User may revoke at any time the consent given for the processing of their data.

Regardless of the purpose or legal basis under which we process your data, you have the right to request access to the data we have collected about you. You can also request the rectification of inaccurate data or, where appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

In addition and under certain circumstances, the User may request the limitation of the processing of their data. In that case, we will only keep their data for the exercise or defense of claims. Also, you may object to the processing of your data in certain circumstances. ISDI Accelerator will stop processing the data, except for compelling legitimate reasons or the exercise or defense of possible claims. Finally, when appropriate, the User may exercise the right of portability to obtain the data in electronic format or that they are transmitted to another entity.

For this purpose, you can use the following channels, always accompanying a photocopy of your ID or any other document that allows you to prove your identity:

- By letter to the address: Internetsia, S.L., C / Viriato 20 - Bajo; 28010 from Madrid (Spain)
- By email to Data Protection Delegate: [dpo@isdi.education](mailto:dpo@isdi.education)

You have the right to appeal to Agencia Española de Protección de Datos (Control Authority competent in this matter), especially when you have not obtained a satisfactory answer in the exercise of your rights, by writing to: C / Jorge Juan, number 6, 28001 - Madrid or through the web: <https://www.agpd.es>

#### 8. Updates and changes in the Privacy Policy

ISDI Accelerator reserves the right to make changes to this Privacy Policy, therefore Users are advised to visit it periodically. When there are significant changes in this Privacy Policy, Users will be notified through notices on the Web, or through any other appropriate procedure depending on the circumstances.