

## PERSONAL DATA PROCESSING AND PRIVACY POLICY

### Hub Innovation s.r.o.

We process personal data only when necessary and to the extent necessary for the given purposes. At the same time, we make sure that the data available to us are correct, appropriately protected and not used for any other purposes. We only process personal data for the necessary period of time. This document is primarily used to inform you about the details of the processing and your rights.

### Data Controller

**Hub Innovation s.r.o.**, IČ (Company ID No.): 28459938, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov, <http://www.hubinnovation.cz/> (hereinafter referred to as the "Impact Hub", "we", "us" and "our"), **e-mail:** [osobni-udaje@impacthub.cz](mailto:osobni-udaje@impacthub.cz).

### Terms and Definitions

#### Data subject = you

Data subject means an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### Controller = we

As defined in Art. 4 (7) GDPR, controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. We are the controller of your personal data.

#### Processor

As defined in Art. 4 (8) GDPR, processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller as instructed by the controller.

#### Supervisory authority

In the Czech Republic, supervisory authority means the Office for Personal Data Protection (hereinafter referred to as the "ÚOOÚ").

### **Job candidate**

Job candidate means a person applying for a job in the controller's company and participating in a selection procedure. The selection procedure may end with the selection of a suitable candidate or by termination of the selection procedure.

### **Customers**

For the purposes of this Personal Data Protection Policy, customer means a natural person using the Impact Hub services respectively natural persons representing a legal person using the Impact Hub services.

### **Experts**

Expert, for the purposes of this Personal Data Protection Policy, means a natural person that provides consulting services to Impact Hub customers and those services are facilitated by Impact Hub.

### **Business partners**

Business partner means an entrepreneur or a non-entrepreneur with whom we have entered into any contract, except for persons who qualify as customers. This term includes but is not limited to supplier relationships.

### **Associated organizations**

Associated organization means an entity that works with the Impact Hub on building the member community. That includes specifically the following entities:

- Hub s.r.o., IČ (Company ID No.): 29021391, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov
- RegioHub s. r. o., IČ (Company ID No.): 24145424 having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov
- Hub for Change, spolek, IČ (Company ID No.): 02228025, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov
- K10 services s.r.o., IČ (Company ID No.): 05351243, having its registered office at Na Kozačce 1103/5, 120 00 Prague 2 - Vinohrady
- Hub Ventures a.s., IČ (Company ID No.): 02418321, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov

## Categories of Data Subjects, Personal Data Processed, Purpose, Legal Basis and Period of Processing

We process personal data for clearly defined purposes:

Categories of data subjects	Purpose of personal data processing	Legal basis and personal data processed	Period of processing
Job candidates	Selection of a suitable job candidate	<ul style="list-style-type: none"> <li>The legal basis is <b>negotiating an employment contract</b>.</li> <li>For this purpose, we process primarily identification details, contact details and other data provided by the candidate, including but not limited to data provided in the candidate's CV and cover letter, and a copy of criminal records if necessary or appropriate.</li> </ul>	For this purpose, personal data may be processed for up to 6 months after the end of the selection procedure (for the purpose of re-establishment of contact in the event that the selected candidate's employment is terminated during the trial period).
	Proving the lawfulness of the procedure when selecting job candidates	<ul style="list-style-type: none"> <li>The legal basis is the <b>legitimate interest of the Impact Hub</b> to prove non-discrimination.</li> <li>For this purpose, we may process primarily identification details, contact details and other data provided by the candidate, including but not limited to data provided in the candidate's CV and cover letter.</li> </ul>	For this purpose, personal data may be processed for the period of <b>3 years</b> (to prove non-discrimination if necessary).
Customers and experts	Negotiating contracts and handling inquiries	<ul style="list-style-type: none"> <li>The legal basis is <b>negotiating a contract</b>.</li> <li>For this purpose, we process identification details (including but not limited to first name, middle name, last name) and contact details (including but not limited to e-mail address and phone number).</li> </ul>	For this purpose, personal data may be processed for the duration of negotiations regarding the conclusion of the contract, or for the period of time when the data subject is placed on the waiting list.
	Performance and execution of contracts in the provision of Impact Hub services	<ul style="list-style-type: none"> <li>The legal basis is <b>performing a contract concluded between the customer and the Impact Hub</b>.</li> <li>For this purpose, we process identification details (including but not limited to first name, middle name, last name, date of birth, IČO (Company ID Number), DIČ (Tax ID Number), nationality), contact details (including but not limited to mailing address or address of</li> </ul>	For this purpose, personal data may be processed for the <b>duration of obligations arising from a contract</b> .

		<p>residence, e-mail address, phone number), details of work activities (website, links to publicly accessible social media profiles; work experience), bank details (bank account and bank code), details of purchase orders, complaints, names and categories of products, in which the customer is involved, photo.</p> <ul style="list-style-type: none"> <li>• Members - for this purpose, we process behavioral details concerning members which include but are not limited to attendance at Impact Hub events, opening e-mails sent by the Impact Hub, payment monitoring, frequency of signing online petitions and other online and offline activities as well as personal data from publicly accessible sources (e.g. social media).</li> </ul>	
	Exercising claims arising from contractual relationships after termination of the contract	<ul style="list-style-type: none"> <li>• The legal basis is the <b>legitimate interest of the Impact Hub</b>.</li> <li>• For this purpose, we process identification details, contact details, accounting details, history of purchase orders and complaints, history of communication. After the contract is terminated, these personal data are necessary to handle complaints, recover debts and enforce compliance with other obligations arising from contracts concluded between the Impact Hub and customers. This documentation may include identification and contact details of natural persons representing legal entities.</li> </ul>	For this purpose, personal data may be processed for the period of <b>10 years</b> after the termination of the contractual relationship and, if administrative or court proceedings are initiated, for the entire duration of the proceedings.
	Disseminating commercial communication in the form of e-mail newsletters containing service offers and news	<ul style="list-style-type: none"> <li>• The legal basis is the <b>legitimate interest of the Impact Hub</b>.</li> <li>• Identification and contact personal details of customers are processed for the purposes of disseminating commercial communication in accordance with Act No. 480/2004 Sb.</li> <li>• In the event that a person cannot be considered an expert or another customer as defined in Act No. 480/2004 Sb., we send them commercial communication at their request only with his/her express <b>consent</b>.</li> </ul>	For this purpose, the personal data may be processed for an <b>indefinite period of time</b> until the recipient unsubscribes.

	Compliance with Impact Hub's accounting, tax and other statutory obligations	<ul style="list-style-type: none"> <li>• The legal basis is compliance with <b>statutory obligations</b> imposed on the Impact Hub by legislation such as the Accounting Act or the Value Added Tax Act and other tax laws etc.</li> <li>• We process identification details, contact details, accounting details, history of purchase orders and complaints, history of communication. After the contract is terminated, these personal data are necessary to handle complaints, recover debts and enforce compliance with other obligations arising from contracts concluded between the Impact Hub and data subjects.</li> </ul>	For this purpose, personal data may be processed for up to <b>10 years</b> after the end of the tax period in which the transaction was carried out.
	Marketing (Impact Hub promotion)	<ul style="list-style-type: none"> <li>• The legal basis is <b>the customer's consent</b>.</li> <li>• For this purpose, we process photos, video recordings or text quotes of data subjects together with their identification details and publish them online, in promotional materials etc.</li> <li>• Where these are <b>group photos or video recordings without any identification</b> of the customers, the legal basis is the <b>legitimate interest of the Impact Hub</b>.</li> </ul>	For this purpose, personal data are processed for the <b>duration of the consent</b> . <b>Group photos without identification</b> may be processed for an <b>indefinite period of time</b> . However, the photo or video recording will be deleted at the request of the person shown.
	Monitoring and statistics	<ul style="list-style-type: none"> <li>• The legal basis is the <b>legitimate interest of the Impact Hub</b> to improve its services.</li> <li>• For this purpose, we process behavioral details concerning the data subjects which include but are not limited to attendance at Impact Hub events, opening e-mails sent by the Impact Hub, payment monitoring, frequency of signing online petitions and other online and offline activities.</li> </ul>	For this purpose, personal data may be processed for the <b>duration of obligations arising from a contract</b> concluded between the customer and the Impact Hub. <b>We process anonymized data for an indefinite period of time</b> .
<b>Business partners</b>	Performance and execution of contracts	<ul style="list-style-type: none"> <li>• The legal basis is <b>performing a contract concluded between the entity and the Impact Hub</b>.</li> <li>• For this purpose, we process data of natural persons, with whom we communicate when concluding and executing contracts, and contractual parties, specifically identification details (including but not limited to first name and last name), contact details (including but not limited to delivery address or address</li> </ul>	For this purpose, personal data may be processed for the <b>duration of obligations arising from a contract</b> .

		of residence, e-mail address, phone number), accounting details (including but not limited to bank account number), payment details etc.	
	Exercising claims arising from contractual relationships after termination of the contract	<ul style="list-style-type: none"> <li>• The legal basis is the <b>legitimate interest of the Impact Hub</b>.</li> <li>• For this purpose, we process identification details, contact details, accounting details, history of communication. After the contract is terminated, these personal data are necessary to recover debts and enforce compliance with other obligations arising from contracts concluded between the Impact Hub and the relevant entities. This documentation may include identification and contact details of natural persons representing legal entities.</li> </ul>	For this purpose, personal data may be processed for the period of <b>10 years</b> after the termination of the contractual relationship and, if administrative or court proceedings are initiated, for the entire duration of the proceedings.
	Compliance with Impact Hub's accounting, tax and other statutory obligations	<ul style="list-style-type: none"> <li>• The legal basis is compliance with <b>statutory obligations</b> imposed on the Impact Hub by legislation such as the Accounting Act or the Value Added Tax Act and other tax laws, Act on Selected Measures Against Legitimization of Proceeds of Crime and Financing of Terrorism etc.</li> <li>• We process identification details, contact details, accounting details, history of communication. After the contract is terminated, these personal data are necessary to handle complaints, recover debts and enforce compliance with other obligations arising from contracts.</li> </ul>	For this purpose, personal data may be processed for up to <b>10 years</b> after the end of the tax period in which the transaction was carried out.

We retain the personal data only for the period necessary for the purpose of their processing – see table above. After the expiration of this period, personal data may be retained only for the purposes of the national statistics service, for scientific purposes as well as for archiving purposes.

## Recipients of Personal Data and Transfer of Personal Data Outside the European Union

In legitimate cases, we may transfer your personal data to other entities (hereinafter referred to as the “recipients”).

Personal data may be transferred to the following recipients:

- Associated organizations as well as entities with whom the Impact Hub works on building the member community;
- Other members or persons, who are part of the member community, if the member agrees with such transfer, primarily for the purposes of creating business opportunities and contacting suitable business partners;
- Processors, who process your personal data according to our instructions (mainly software providers and IT administrators), and relationships with such processors are regulated by data processing agreements:
  - **Bit Carvers s.r.o., IČ (Company ID No.): 04507517, having its registered office at Neklanova 112/9, 128 00 Prague**
    - Provider of internal software for the administration of purchase orders, member tariffs, accounting and more
    - We transfer our customers’ personal data for the purposes of performing or executing contracts in the provision of Impact Hub services
  - **The Rocket Science Group LLC, having its registered office at 675 Ponce de Leon Avenue, Atlanta, United States**
    - Provider of an e-mail marketing system
    - We transfer our customers’ personal data for the purposes of Impact Hub marketing and promotional activities
  - **Prodimo Accounting s.r.o., IČ (Company ID No.): 24840891, with its registered office at Francouzská 284/94, Vršovice, 101 00 Prague 10**
    - Accounting firm
    - We transfer our customers’ and suppliers’ personal data for the purposes of keeping tax and accounting records
    - We transfer our employees’ personal data for the purposes of payroll accounting
- Processors who process your personal data according to our instructions:
  - **Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland**
    - Provider of the Google Drive service used to store data in an online repository
      - We transfer personal data of all entities mentioned in this policy only for the purposes of archiving
    - Google Analytics service provider
      - We transfer behavioral data on visits to our website for the purposes of improving its functionality
- Public authorities and other entities if required by applicable legislation (including but not limited to financial administration, Police of the Czech Republic and other investigative, prosecuting and adjudicating bodies etc.);
- Other entities in case of emergencies if it is necessary to disclose data to protect life, health, property or another public interest or if it is necessary to protect our rights, property or safety.

## Cookies

A “**cookie**” is a short text file containing a specific chain of characters with unique information about your browser. Most browsers are set up to accept cookies. However, you have the possibility to set up your browser to block cookies or to inform you about receipt of cookies. However, without cookies some services or features will not work correctly.

Some websites may contain links to various websites, including but not limited to social media such as Facebook, Twitter, Google+, Youtube, etc. These links are not part of the Impact Hub website. They are part of third party websites that may use cookies that track data subjects' online activities. Third party cookies follow privacy policies of such third parties.

## Your Rights as a Data Subject

You have the right to require that we grant you **access to the personal data concerning you** under the conditions set out in Article 15 GDPR.

You have the right to **revoke, at any time, your consent to the processing of personal data** that we process based on your consent under the conditions set out in Article 7 GDPR. You have the right to **object to processing of personal data** concerning you under Article 21 GDPR.

You have the right to request that we **rectify personal data** under the conditions set out in Article 16 GDPR, **limit the processing of personal data** under the conditions set out in Article 18 GDPR or **erase data** under the conditions set out in Article 17 GDPR.

You have the right to **portability of data to another controller** under the conditions set out in Article 20 GDPR.

You have the right **not to be subject to a decision based solely on automated processing, including profiling**, under the conditions set out in Article 22 GDPR. When processing personal data, **we do not use automated individual decision-making**, including profiling, i.e. without human interference.

You have the right to **obtain information about any breach of your personal data** under the conditions set out in Article 34 GDPR.

If you believe that the processing of your personal data violates your obligations laid down in the GDPR, you have the right to **lodge a complaint with the supervisory authority** under the conditions set out in Article 77 GDPR. The Office for Personal Data Protection is the supervisory authority in the Czech Republic.

**This Privacy Policy is effective from 17th April 2019.**

