

Baltic Sandbox Ventures (UAB “BSV Management”)
Privacy Policy and GDPR Consent
Last Updated: 30 May 2023

Introduction

UAB “BSV Management” (“we”, “our”, “us”, the “Company”, or “Baltic Sandbox Ventures”), with its registered address at Vašingtono a. 1-11, LT-01108 Vilnius, Lithuania, is committed to protecting and respecting your privacy. This Privacy Policy and GDPR Consent (the “Policy”) sets out the basis on which any personal data we collect from you, or that you voluntarily provide to us, will be processed by us.

This Policy applies if you use, have used, or have expressed an intention to use, or is in other way related to any of the services provided by the Company when you use our website, when you contact us, or otherwise cooperate and engage with us through our team or service fronts. By using our services or submitting your personal information, you are accepting and consenting to the practices described in this Policy.

1. Collection and Use of Personal Data

Our data collection practices might involve the collection, storage, and use of various personal data types, which could include but are not limited to:

1. **Contact information:** Full names, email addresses, phone numbers.
2. **Professional information:** Name of organization you represent, information about the organization you represent, resumes or CVs, bios or other personal descriptions.
3. **Other information:** Any other information you willingly provide to us.

This information can be used for:

1. Providing, maintaining, and improving our services.
2. Responding to your questions or comments.
3. Communicating with you about our services, promotions, and news.
4. Conducting market research, statistical analysis, and business intelligence activities.
5. Complying with legal obligations, including those related to tax and anti-money laundering.
6. Any other purpose for which the information was collected, as permitted by law.

In addition to the above (lawfulness of processing (use of data) according to Article 6 (1) of GDPR):

- the processing (use of data) is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject before entering into a contract;

- processing (use of data) is necessary to protect the vital interests of the data subject or another natural person;
- processing (use of data) is required for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing (use of data) is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data.

The exact types of personal data we process, depends on the relationship between you and Batic Sandbox Ventures.

2. Information We Collect Automatically

When you visit our website, we may automatically collect certain information about your device and usage of our services. This includes information about your operating system, your IP address, location, time and date of access, and information about your browsing behavior on our site.

We use web analytics services, Google Analytics by Google Inc., to compile Technical Data, track user visits and report on website and social media visitor usage and to help us improve our services. For more information on how Google Analytics uses cookies to measure user interactions on websites, please check out the following link:
<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

3. Cookies

Our website uses different technologies, including cookies, to distinguish you from other users of our website, to collect and store information. Cookies help us track the number of people using our services and how they are being used. This allows us to improve our Services and provide a better experience for you. For detailed information on the cookies we use and the purposes for which we use them, please refer to our Cookie Policy.

You can choose to refuse cookies or get alerts when they are sent by adjusting your web browser settings. However, please keep in mind that certain parts of our services may not work properly if you reject cookies.

4. Sharing and Disclosure of Personal Data

We only share personal data within the UAB “BSV Management” team if and as far as reasonably necessary to perform and develop our services.

We may share personal data with third parties outside of UAB “BSV Management” organization only in the following situations:

1. It is necessary to comply with legal obligations or to protect our rights.
2. It is necessary for the purposes set out in this Privacy Policy (in accordance with all applicable laws and regulations).
3. It is necessary to our service providers and advisors that perform services for us.
4. It is necessary to other parties with your consent or as disclosed to you when collecting your personal data.

5. International Data Transfers

The data handled within our Company is stored within the EU/EEA.

For our website, we use such service providers as Google Analytics, which can be located outside of the EEA. As such, we and our service providers may transfer personal data to or access it in jurisdictions outside the European Economic Area.

We will ensure that your personal data receives adequate protection in the jurisdictions where we and our service providers process it.

6. Data Security

We employ reasonable and appropriate technical and organizational measures designed to protect your personal data from unauthorized access, use, or disclosure. However, the transmission of information via the internet is not completely secure, and we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

For collection and storage of sensitive personal information we use high level secure and encrypted software.

7. Retention of Personal Data

We will retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, but no longer than it is required and legally permitted.

Your personal data will be deleted within reasonable time after you no longer use any part of our services or when you make a request regarding deletion of your personal data.

8. Your Rights Under the GDPR

Under the General Data Protection Regulation (GDPR), you have several rights regarding your personal data:

1. The right to access your personal data. You can contact Baltic Sandbox Ventures (UAB “BSV Management”) and we will provide you with information about what personal data we have and how we use/process it.
2. The right to be informed about the collection and use of your personal data.
3. The right to correct inaccurate or incomplete personal data.
4. The right to delete your personal data, also known as “the right to be forgotten”. We will delete your data upon request, unless we have a valid reason not to do so. It may take some time to remove all remaining copies of the data from our servers and backup systems after the active data has been deleted. However, we will make sure to delete those copies as soon as we reasonably can.
5. The right to object use/processing of your personal data for specific purposes and under certain conditions
6. The right to data portability, which allows you to obtain and reuse your personal data for your own purposes.
7. The right to lodge a complaint with a supervisory authority. If you believe that our use/processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.
8. The right to withdraw consent. You may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use our services.

To exercise any of these rights, please contact us at info@balticsandbox.ventures.

9. Changes to this Policy

We may update our Policy from time to time. Any changes we may make to our Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Policy. Your continued use of our services after any such changes indicates your acceptance of the changes.

10. Contact

Questions, comments and requests regarding this Policy are welcomed and should be addressed to info@balticsandbox.ventures.

Consent

By agreeing to this Policy, you are consenting to UAB “BSV Management” use and processing your personal data for the purposes outlined.

You can withdraw consent at any time by emailing us at info@balticsandbox.ventures.