

Description of the File
Personal Data Act (523/1999) Section 10
Date of drafting: 14.08.2017

1. Controller	Phoenix NPO Telakkakatu 8 Building 11, 00150 Helsinki Finland
2. The person in charge and/or contact person	Camilla Naatus Telakkakatu 8 Building 11, 00150 Helsinki Finland +358 50 4622133 camilla@startuprefugees.com
3. Name of the Register (Should describe the content)	Business Program Database for Startup Refugees
4. The purpose for processing the personal data/ the purpose for the use of a register	The registered customer's personal data is processed in order to maintain, manage and develop the customers relationships related to the service, to preform analysis and compile statistics, and to produce, offer and develop the service
5. Content of the register (For instance: name, address and telephone number of the data subject)	<p>The register is used to process the following information related to the customers use of the service, when the customer wishes to support the network and its members:</p> <ul style="list-style-type: none"> • The registered customer's name • Information related to the customer's business • The city or cities where the customer operates its business in • Information relating to the customer's willingness to participate in the service <p>The register is used to process the following information related to the customers use of the service, when the customer wishes to promote their business idea to the network and its members:</p> <ul style="list-style-type: none"> • The name of the business and contact email address and telephone number • Information related to the business idea • Information related to staff and other people involved in the business • Information relating to the partners and supporters of the business • Support proposal relating to the service
6. Regular sources of information (Which data is received, by whom and on what ground. For instance: consent or provision of a law)	Personal information is collected during registration, while the service is being used or otherwise directly from the registered customers. Personal information may also be collected and updated from the Population Register, the Finnish register for direct marketing prohibitions,

	and other similar registers
7. Regular destinations of disclosed data and whether the data is transferred to countries outside the European Union or the European Economic Area	Startup Refugees may hand over personal information to the extent that is allowed and required by the existing legislation. Information may be transferred to countries outside the European Union and the European Economic Area. When information is transferred to a country for which no adequacy decision of the European Commission exists, such transfer will be subject to the provisions of the clauses adopted by the European Commission.
8. The principles how the data file/register is secured	Information is collected in common databases that are protected by firewalls and other technical means. The databases are located in locked, guarded premises, and only specific, pre-determined persons can access the information
9. Right of Inspection	In accordance with Section 26 of the Personal Data Act, a registered customer has the right to inspect the data concerning them that has been recorded in the register. The request for inspection shall be sent to the address below, in writing and with the registered customer's signature: Startup Refugees Telakkakatu 8 Building 11, 00150 Helsinki Finland