

**Phoenix ry Privacy Policy**  
**Latest update: 20.05.2022**

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3. The purpose of this privacy policy	This document will provide you with detailed information on the types of personal data, that could be gathered once you visit and interact with Startuprefugees.com and <a href="https://match.startuprefugees.com">https://match.startuprefugees.com</a> Besides, it will provide more details on issues such as how and why the data is collected, who can access it, with whom it could be shared and how and how long the data is kept.

4. Personal data collected

In case you would like to find a job/develop your skills/establish your own business as an immigrant in Finland or join us and get involved with us, you would need to fill in some personal data. In all situations your personal data will be directly provided by you\*. The following explains in detail such situations:

1. Match profile: please note that if you create an account into the Match and make a CV, you will actively and willingly enter different types of personal data (including, name, phone number, email address, date of birth etc.) into the system. It is basically your personal CV/Profile, that you create with your own initiation and consent. We can make sure that all the personal data would be secured in the Match, and we won't share it with anyone, unless specifically asked from you, while the sharing would 100% serve the purpose for which you created the profile and provided the data. The data subject has the right to update, edit, download and remove the data. By downloading your profile, you can transfer your data. We strongly advise you to keep your profile and contact details updated, or contact us to do it for you.
2. Joining us: If you are interested in supporting us, one way or another, such as sharing your skills, offering job opportunities, supporting business, you need to fill in some

personal data, such as your name, company name, email address, phone number. You will, with your own initiation, supply the data, and we will make sure to secure the data and use it only for the purpose for which it was provided.

3. Volunteering for us: if you are interested in volunteering for us, you will be directed (by actively clicking on the provided link) <https://bit.ly/3wGaSZ7>. You need to fill in some personal data, including your name, email address and phone number. You enter the data with your own consent and we make sure to keep it secure and use it only for the purpose for which it was provided.

4. visiting and interacting with the website: Please see our Cookies' Policy <https://startuprefugees.com/cookie-policy/>

\* In case of visiting our website, there is some data that we could collect from you. Please see our Cookies' Policy <https://startuprefugees.com/cookie-policy/>

<p>5. The purpose for gathering and processing the above mentioned personal data</p>	<p>The registered customer’s personal data is processed in order to maintain, manage and develop the customers relationships related to the service, to perform analysis and compile anonymous statistics, and to produce, offer and develop the service. All types of personal data provided by different data subjects, from newcomers (immigrants) to companies and volunteers are received based on specific purposes. These purposes could be i.a. finding or offering a job opportunity, sharing skills and experience. We make sure that we receive only necessary data suitable for serving a specific purpose. Besides, we endeavor to provide secure methods for processing the data. E.g. Match profiles won’t be accessible with all staff, not all information provided on the Match, such as legal residential status, will be shared with the potential employers. Startup Refugees needs such information to successfully perform its tasks and serve the data subject purpose of sharing the data. Moreover, you have a chance to check your visible data by yourself, and above all, you have the right to ask us about the kind of personal data that we have from you and the kind of data that could be shared with potential employers. Needless to remind that, we will contact you each time before sharing your data and ask your specific permission.</p>
<p>6. Right to access the information</p>	<p>You have the right to contact and ask us to send you a copy of all types of personal data that we keep in our system from you. We try to provide you with the data as soon as possible, max within 3 to 4 weeks.</p>

7. Keeping the data

We make sure to keep your data secure and in an organized way. CVs/profiles will be saved and kept only in our database, Match. The Match is protected by firewalls and other technical means. The database is protected by your strong password, codes that each time for any log in would be sent to the users' phone, and only specific, pre-determined staff could access the database.

In case for a recruitment or any other valid purposes, if we copy your data elsewhere, we make sure that its new place is safe and secure, serving the purpose and temporary.

Volunteer and other network members' data will be saved on our internal CRM system HubSpot which is accessible only by Phoenix ry staff members. The data includes: 1) the information you have provided Phoenix ry regarding volunteering / working pro bono with us 2) the date we have last contacted you and the reason why we contacted you 3) information about your cooperation and interaction with Phoenix ry.

We rarely keep personal data on hardcopies (papers), if we do so, we make sure that it is necessary and it is properly secured, locked and only specific staff access it.

We keep your data as long as it is necessary for the purpose you provided it, or necessary for other legal, administrative and security purposes. You have anyway the right to contact us and request to delete all kinds of data that we have from you, unless in rare and exceptional situations when doing so would be against our legal and administrative obligations. For instance, when you have found a job through us, and for fund reporting

	<p>purposes, we must keep some part of your data. In this case we make sure to delete anything else and will delete the ones needed for a specific purpose, after the need is fulfilled.</p>
<p>8. Sharing the data</p>	<p>As the main rule, we won't share your personal data with anyone, unless 1. To fulfill the purpose of data provided by you, otherwise why are you providing us with your data in the first place? For instance, sharing your CV (which is kept in the Match) with a potential employer. 2. Still, we contact you and specifically ask from you for sharing your data (in this case CV) with a specific employer.*</p> <p>So, both mentioned conditions are met, when we start sharing your data. Moreover, your consent is revocable, and you can always at any stage contact us and ask us to stop processing your data. If it is already too late, we can contact the employer and request to forget you.</p> <p>The same rule applies when you are volunteering, or being active as a network member. Your personal data would be shared 1. internally among those staff, who need to together with you provide training, workshops, recruitment, etc. 2. Externally, only in specific cases, and when it must be shared to meet the purpose, (e.g. in a mentoring program when you are volunteering as a mentor), with specific newcomers.</p>

	<p><b>* In exceptional situations, specifically when we find you a job, we may need to share your personal details with the fund provider. We are a non profit organization and our services are free of charge, we may need to share specific results of our works to specific entities, fund providers, in order to continue, exist and develop.</b></p>
<p>9. Right to be forgotten and restriction on processing the data.</p>	<p>As the basic rule, you have the right to request deleting all types of data that we keep from you. We try to immediately, max within 3 weeks, erase all types of your personal data in our system, and we will inform other colleagues of us, not to contact you anymore. We may still, in some exceptional situations, keep parcial data for a specific period of time. You can see more at the end of "keeping the data" section.</p> <p>You also have the right to impose restrictions on processing your data by us. The restriction could be based on different grounds, from subject matter to time restrictions. A simple example could be, I would like to be contacted only for job opportunities in this specific field. Or, I would like to be contacted after this year when I finish my study.</p>