

PRIVACY POLICY

GENERAL INFORMATION ON DATA PROCESSING ACTIVITIES RELATING TO THE OPERATIONS OF JUNCTION OY

Junction Oy ("the Company", "we") provides various hackathon events and related online services under its own operations or through various local affiliates. For these purposes the Company may collect and process personal data of customers and users of the Websites and we may also process personal data collected in the Junction or JUNCTIONxevents in person ("Events").

The purpose of this Privacy Policy is to clarify and inform the applicants to our hackathon events, visitors to those events and the users of Websites ("Users") on how their personal data is processed and stored.

This Privacy Policy applies to personal data contained in our customer and marketing registers we obtain from Users when they use the Junction websites as well as when they visit the Events. In this Privacy Policy, the hackjunction.com -website, the localized websites of JUNCTIONxLocation events location.hackjunction.com -website ("Websites") and the services offered at the Events are collectively referred to as the "Services".

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on our Websites. We will not make substantial changes to this Privacy Policy or reduce the rights of the Users under this Privacy Policy without providing a notice thereof.

Please note that this Privacy Policy only covers data processing carried out by the Company as a data controller. This Privacy Policy does not address, and we are not responsible for, the privacy practices of any third parties. The Company disclaims all responsibility for the processing carried out by third parties, also in cases where Services include hyperlinks to third parties's websites.

1. COMPANY'S CONTACT DETAILS

Name: Junction Oy
Business ID: 2823785-1
Correspondence address: PL1188, 00101 Helsinki, Finland
E-mail: hello@hackjunction.com

Contact person:
Name: Iiro Nurmi,
Telephone: +358 45 6717792,
E-mail: iiro.nurmi@hackjunction.com

PERSONAL DATA PROCESSED AND SOURCES OF DATA

We collect two types of information from the Users: User Data and Technical Data. Although we do not normally use Technical Data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with User Data. In such situations, Technical Data can also be considered to be personal data under applicable laws and we will treat the combined data as personal data.

The Company may collect and process the following User Data received from the Users via registration forms completed on Websites, email or User Data received from the Users on the phone or in person at the Events:

- First name
- Last name
- Phone number
- Date of birth
- Email
- Postal address
- Pictures
- Roles and responsibilities regarding employment
- Information regarding skills, education and professional background
- CV's and other certificates

- User information (usernames) on various other web services
- Customer feedback received via email or in person
- Any other information submitted or shared during the application process or during the event relating to the applicants, applications, company and user profile.

In addition to the above mentioned, we obtain User Data from registers maintained by the authorities and customer default registers as well as other reliable private and public registers.

2. PURPOSES AND LEGITIMATE GROUNDS FOR PROCESSING OF PERSONAL DATA

Purposes

There are several purposes for the processing of personal data by the Company:

To provide and develop the Services

We process personal data in the first place to be able to offer the Services to the Users as well as for customer verification. We process personal data for the evaluation and selection of potential applicants and team members for the hackathon programs run by the Company.

We also process the personal data provided by the Users in order to develop the quality of our Services, for instance by analyzing the employment and education histories of the Users and the programs the Users have applied to or otherwise shown interest in.

For customer communication and marketing

We process personal data for the purpose of maintaining our customer relationships with the Users, for instance by contacting the Users regarding the Services. We also process personal data of the Users in order to inform the Users of changes relating to the Services. We use personal data for marketing and advertising the products provided by us, e.g. to customize the User's experience by providing the User with targeted offers and advertising information based on the information gathered from the User during his/her previous visits to the Services and to the Events.

If the User contacts us to give feedback with respect to our Services, we will use the provided information for answering questions and solving possible issues.

Legitimate grounds for processing

We process personal data to perform our contractual obligations towards the Users with respect to the Users registered on our Websites, Users applying or registering as attendees in the Events. Furthermore, we process personal data based on our legitimate interest. Our legitimate interest is based on running, maintaining and developing our business, improving the customer or visitor experience of the Users as well as on performing direct marketing.

In some parts of the Services, the Users may be requested to grant their consent for the processing of personal data. In this event, Users may withdraw the above mentioned consent at any time.

3. TRANSFERS TO COUNTRIES OUTSIDE EUROPEAN ECONOMIC AREA

The Company stores the Users' personal data primarily within the European Economic Area. However, the JUNCTIONx-concept has a wide network of localized JUNCTIONx-events providing the same Service in several geographical locations. As such, we, the JUNCTIONx-events and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which it is processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements.

More information regarding the transfers of personal data may be obtained by contacting us on address mentioned in this Privacy Policy.

4. RECIPIENTS

We only share personal data within the Junction organisation and if and as far as reasonably necessary to perform and develop our Services. We do not share personal data with third parties outside of Junction organization unless one of the following circumstances applies:

For legal reasons

We may share personal data with third parties outside Junction organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of the Company, the Users or the public in accordance with the law. When possible, we will inform the Users about such transfer and processing.

To authorized service providers

We may share personal data to authorized service providers who perform services for us (including local affiliates organizing the JUNCTIONx events, data storage, sales, marketing and customer support services). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy.

With explicit consent

We may share personal data with third parties outside the Junction organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so. The User has the right to withdraw this consent at all times.

5. STORAGE PERIOD

When it comes to the Users who have registered to our Services, either on the Websites or in the Events, we will store the User Data collected in connection with the registration for as long as the User in question is a registered customer or user of our Services. A registered User may, at any time, delete his/her user account or prohibit us from using personal data for direct marketing purposes. When the User is no longer a registered user or a member of our Services, we anonymise the personal data relating to said User in our possession.

With respect to unregistered Users who attend the Junction or JUNCTIONx events, we will store the User Data collected in connection with the attendance to the Event for a reasonable period after the Event has been concluded. We will store such User Data for as long as reasonably necessary for internal reporting and documenting purposes and delete it within reasonable time after the relevant Event has ended or when the User makes a request regarding deletion of such Personal Data. We will anonymise the User Data in question within a reasonable time after the end of the Event, save for when we are required by law or accounting standards to store such information in the form of personal data.

We will store web analytics relating to the Services and other Technical Data for a reasonable time, but no longer than 26 months for the purposes specified in this privacy policy.

6. USERS' RIGHTS

Right to access

The Users have the right to access the personal data relating to them and processed by the Company. This means that the Users may contact us, and we will inform what personal data we have collected and processed regarding the said User and communicate the purposes such data are used for.

Right to correct

The Users have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored about the User corrected or completed. By contacting us on the addresses indicated above, the User may update e.g. his/her contact details or other personal data.

Right to deletion

The Users may also ask us to delete the Users' personal data from our systems. We will comply with such request unless we have a legitimate ground not to delete the data. Such legitimate ground may be based on e.g. applicable legislation.

Right to object and right to restriction of processing

Notwithstanding any consent granted beforehand for the purposes of direct marketing, the User has the right, at any time, to prohibit us from using the User's personal data for direct marketing purposes, market research and profiling by contacting us on the addresses indicated above. The User may prohibit us from sending direct marketing to the User by using the unsubscribe possibility offered in connection with any direct marketing messages.

The User may request us to restrict processing of personal data, when the accuracy of the personal data is contested by the User.

In addition, the User has in certain special circumstances the right to object the processing of his/her personal data on grounds relating to his/her particular situation.

Right to data portability

The Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

How to use the rights

The above mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above, including the following information: name, address, phone number and a copy of a valid ID. We may request the provision of additional information necessary to confirm the identity of the User. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

7. DIRECT MARKETING

If the User has provided his/her consent for receiving direct marketing or if any other lawful ground applies for such direct marketing, the Company may contact the Users for the purposes of direct marketing. This means that the Company may use the User's personal data that it has collected in accordance with this Privacy Policy to contact the User with respect to product offers and other direct marketing.

The Users have the right to prohibit the Company from processing Users' personal data for direct marketing purposes as mentioned above in the section regarding the Users' right to object and right to restriction of processing.

8. LODGING A COMPLAINT

The User can lodge a complaint with the local supervisory authority for data protection, in case the User considers the Company's processing of personal data to be inconsistent with the applicable data protection laws.

9. INFORMATION SECURITY

We have taken all administrative, organizational, technical, and physical measures to protect the personal data we collect and process. All personal data is stored in a data system protected with data protection software. The data system cannot be accessed without a user name and a password. It is also protected by fire walls and other technical measures. The data contained in the data system is accessible only to certain predetermined employees of the Company. The data contained in the data system is stored in locked and monitored premises.
