

## Privacy Statement Startergy

### 1. Introduction

Startergy is an start-up company developing a platform for starting entrepreneurs. Startergy provides this target group with the help they need in the registration phase, starting phase and the entrepreneurial phase.

### 2. Personal data

Personal data are data relating to an identified or identifiable natural person. For instance, your name, address, birth date and telephone number. If you register on our website and/or use our services, we process personal data like your name, address, phone number and email address.

### 3. Legitimate purposes

We process your personal data with the utmost care. The legitimate purposes we process your personal data for are:

- **Performing the agreement:** registration to the website and processing transactions and exchange messages, also via our partners;
- **Business Process Execution:** analyzing data regarding the use of the website to enhance the website, product development and management reporting;
- **Marketing:** processing your personal data for promotional activities;
- **Compliance** with legal obligations; and
- **Safety and Security:** in order to protect your and our assets we might block the website in case of suspicion of fraud and/or abuse of the website.

### 4. Cookie Statement

We may use tracking cookies or similar technologies on the Startergy website, for instance for identifying your smartphone. If we process personal information, we will request your consent. When you visit the Startergy website, Startergy collects standard log information and details of visitor behavior patterns. Startergy does this to operate the website correctly, to collect statistical information on the use of the website, and to ensure compliance with mandatory legal requirements. The website collects and stores some visitor information about how the website is used, such as date and time of day you access our website, browser type, browser language, the Internet Protocol (IP) address of the computer you are using, number of hits, the pages visited, previous/subsequent sites visited and length of user session.

The information mentioned above is gathered by using cookies and similar technologies (hereafter 'cookies'). A cookie is a small text file that is stored by your browser on your computer. On each subsequent visit to the website, the browser searches for cookies. If the browser finds cookies, it sends the information stored by the cookie to the website. The website downloads cookies on your computer, tablet or mobile phone which are strictly necessary for the functioning of the website, such as cookies that ensure that you can retrieve information on the website quickly, and cookies that are strictly necessary to provide a service which has explicitly been requested by you, such as a cookie that remembers your cookie settings. To download cookies that are not strictly necessary, such as cookies for gathering statistical information, Startergy needs your prior consent.

If you have adjusted your cookie settings so that websites are not permitted to place cookies on your computer, the Startergy website may not be able to download the cookie which remembers whether or not you consented to the placing of cookies. If so, you will be asked to indicate your cookie preferences each time you visit the website. If you do not wish to be asked about your cookie preferences each time you visit the website, you need to adjust your browser's cookie settings.

This Privacy and Cookie Statement may be modified from time to time to comply with applicable laws or to reflect our updated business practices, so please check this Privacy Statement periodically for any changes.

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## **5. Promotional activities**

We may process your personal data for promotional activities, like mentioning you and your team members including your team photo on our website.

## **6. Data retention**

If you use our transaction and messaging services, you enter into a subscription with Startergy. To comply with legal obligations we retain your personal data for seven years, or for any other period as may be required by laws and/or regulations.

## **7. Your rights**

It is possible that you want to adjust your data. Please find below your rights and how you can adjust your data.

- a. Right to access personal data: if you want to know which personal data we process, you can use your right to access your personal data by sending an email to [hello@startergy.nl](mailto:hello@startergy.nl)
- b. Right to correct personal data: if your personal data is not correct, you can request us to adjust your personal data by sending an email to [hello@startergy.nl](mailto:hello@startergy.nl)
- c. Right to refuse commercial offers (opt-out): if you do not want to receive commercial offers anymore, you can use the opt-out link in the commercial email you received.

## **8. Changes**

We can change our Privacy Statement. Please check our Privacy Statement regularly for the latest version.

## **9. Regulatory information**

Startergy is part of ING Bank N.V. ('ING'). ING has its statutory seat in Amsterdam at Bijlmerplein 888, 1102 MG, The Netherlands, Trade Register number 33031431. ING is regulated and licensed by the De Nederlandsche Bank ('DNB') and the European Central Bank ('ECB') for payment services. ING is also regulated and licensed by the Autoriteit Financiële Markten ('AFM') and regulated by the Autoriteit Consument & Markt ('ACM'). Information regarding supervision of ING can be obtained from DNB ([www.dnb.nl](http://www.dnb.nl)), AFM ([www.afm.nl](http://www.afm.nl)) or ACM ([www.acm.nl](http://www.acm.nl)).