

PRIVACY POLICY SPACEFOUNDERS

This privacy policy describes the privacy and data management practices of SPACEFOUNDERS, including its partners, service providers, and subcontractors.

SPACEFOUNDERS represented by SPACEFOUNDERS FRANCE, a subsidiary of CNES, involved in the incubation and acceleration of European space startups, as well as investment operations.

In the course of its activities, SPACEFOUNDERS collects personal data, which will be processed in accordance with the applicable data protection regulations, including the amended Law of January 6, 1978, relating to data processing, files, and freedoms, and the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR).

For all personal data processing, SPACEFOUNDERS (hereinafter referred to as "SPACEFOUNDERS," "we," "our") is the data controller.

1. PERSONAL DATA COLLECTED

In the context of startup acceleration programs, including application submissions, event organisation, newsletter subscription, or contact form submissions, SPACEFOUNDERS collects and processes personal identification data ("**Identification Data**"), such as name, surname, email address, phone number, username, password, copy of the ID card, and photograph. In addition, SPACEFOUNDERS collects professional data ("**Professional Data**") such as competence, experience/expertise and function.

Our service providers may use tracking and tracing tools, such as cookies. We collect connection data ("**Connection Data**"), including IP address, log files, pages visited, browser type, and clicked links. Some of these cookies are necessary for the operation of platforms and our website and are not subject to consent.

2. PURPOSES

We use your personal data for the following purposes:

Creating your account and submitting your application for the startup acceleration program: You can apply for the startup acceleration program via the Accelerator App platform. When you log into the platform and submit your application, we collect your Identification Data, including your email address, name, surname, telephone number, a copy of your ID card, a photo and your login details (login and password).

Newsletter subscription: We collect your Identification Data, in particular your email address, to subscribe to our newsletter. This newsletter enables us to communicate about our actions, services and any other elements likely to be of interest to you.

Contact via the contact form: You can send us all your requests and questions via our contact form accessible on the SPACEFOUNDERS website. In order to process your request, we collect your Identification Data, in particular your email address, your surname and your name.

Registration for events organised by SPACEFOUNDERS: SPACEFOUNDERS organises events for startups. Registration for these events is carried out on the Eventbrite platform. When you connect to the platform and confirm your participation, we collect your Identification Data, in particular your email address, telephone number, name, surname, as well as your login details (login and password).

Improving services and the user experience on the SPACEFOUNDERS website: To this purpose, we collect Cookies and other Connection Data. The recording of this data is for systemic and statistical purposes only.

Any involvement in the content of the program (mentor, speaker...): Further involvement in the content and organisation of events and the startup program (especially as a mentor, speaker, workshop organiser, jury member, evaluator, event partner): In order to process your request, we collect your identification data, in particular your email address, your surname and your name.

3. LEGAL BASES FOR PROCESSING

- **Creation of your account and submission of your application to the startup acceleration program:** This data processing, necessary for the submission and processing of your application, is based on contractual performance.
- **Subscription to the SPACE FOUNDERS newsletter:** Our newsletter communications will always be related to our business, so this data processing is based on contractual performance. However, you will always be able to unsubscribe and inform us of your wish to no longer receive this newsletter.
- **Contact via the contact form:** When you send us a request via the contact form, you consent to the processing of your personal data, so this processing is based on consent.
- **Registration for events organised by SPACEFOUNDERS:** The organisation of events requires the collection and processing of data for contractual purposes.
- **Improving our services and the user experience on the SPACEFOUNDERS website:** We collect your login data in our legitimate interest.
- Any involvement in the content of the program (mentor, speaker...): In order to process your request, we collect your data for contractual purposes

4. DATA RETENTION

In compliance with applicable regulations, we will retain your personal data for as long as necessary for the specified purposes.

PURPOSES	PERSONAL DATA COLLECTED	LEGAL BASIS	DATA RETENTION
Create the account and apply to the startup acceleration program	Identification Data (surname, name, email address, phone number, copy of the ID card, photo, username, password) Professional Data (competence, experience/expertise, function)	Contract	5 years
Newsletter subscription	Identification Data (surname, name, email address)	Contract	3 years
Contact with the contact form	Identification Data (surname, name, email address)	Consent	Deletion of data once the request has been processed and no further data processing has taken place
Registration for events organised by SPACEFOUNDERS	Identification Data (surname, name, email address, phone number, username, password)	Contract	6 month after the event
Improving services and the user experience on the SPACEFOUNDERS website	Use and Connection Data (IP address, log files, pages visited, browser type, and clicked links, cookies)	Legitimate interest	Connection log logging : 1 year
			Cookies: 13 months for cookies not subject to consent / 6 months for cookies subject to consent
Any involvement in the content of the program	Identification Data (surname, name, email address, phone number, photo, username, password)	Contract	3 years

5. DATA RECIPIENTS

We may share your personal data, including Identification Data and Connection Data, with third-party service providers who perform various functions.

Our contracts with these third parties require that they maintain the confidentiality of the personal data we provide to them, that they act solely on our behalf and in accordance with our instructions, and that they do not use the data for any purpose other than the product or service they provide to us or on our behalf.

It's the following entities:

- AcceleratorApp
- Docusign
- Google
- Hubspot
- Microsoft
- Eventbrite

We may also transmit your personal data to the following entities, with which we have Memorandum of Understanding:

- Centre national d'études spatiales - CNES (France)
- University of the Bundeswehr Munich - UniBw M (Germany)
- Agenzia Spaziale Italiana - ASI (Italy)
- Deutsches Zentrum für Luft- und Raumfahrt - DLR (Germany)
- European Space Agency - esa (headquarters in France - center in Netherlands)
- European Innovation Council - EIC (Belgium)
- Airbus Defense & Space (France and Germany)
- Thales Alenia Space (France and Italy)
- Beyond Gravity (Switzerland)
- Safran (France)

All the above-mentioned entities are signatories of a code of ethics, as such they have committed themselves to obligations in terms of prevention of conflict of interest and confidentiality.

As part of the startup acceleration program, members of the jury responsible for selecting candidates will inevitably have access to your personal data.

We may share your personal data with courts or other government agencies when we believe in good faith that we are required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our business, or to respond to a court order, subpoena, search warrant or other law enforcement request.

6. RIGHTS OF INDIVIDUALS

You have the following rights under applicable regulations:

- Access to your data;
- Modification or request for data correction;
- Request for data deletion;
- Object to data processing;
- Limit data processing;
- Request data portability, it's the possibility to receive all personal data in a structured, commonly used format, in particular for the purpose of transmitting them to another data controller.

To exercise your rights, please contact us at the address specified in the "CONTACT" section.

7. DATA SECURITY

We implement technical and organisational measures to ensure reasonable and appropriate security of the personal data we collect. By way of example, we:

- Constantly work to update our security practices in order to implement the best methods to protect your personal data, and regularly review our security procedures. This includes:
 - Assigning strictly personal and strong logins and passwords;
 - Remind users of the necessity of using personal and strong logins and passwords;
 - Regular back-ups;
 - Use of secure transmission channels;
- Comply with current regulations on the protection of personal data and with security recommendations;
- Ensure that our subcontractors and partners guarantee a high level of security and a virtuous and respectful use of personal data;
- Ensure the highest level of security for the transmission of your personal data to our third-party service providers;
- Train our staff and require them to protect your personal data.

8. DATA TRANSFERS OUTSIDE THE EUROPEAN UNION

We reserve the right to transfer, process, and store your information outside your country of residence, where we or our third-party service providers operate, in accordance with applicable regulations.

9. MODIFICATIONS AND UPDATES OF THIS PRIVACY POLICY

We reserve the right to make changes or updates to this privacy policy to adapt to regulatory changes and our solutions. We will inform you through our platforms or by email.

All modifications are effective upon publication.

10. CONTACT

If you have questions or inquiries regarding this privacy policy or how SPACEFOUNDERS processes personal data, please contact us at hello@spacefounders.eu

If, after contacting us, you believe your rights have not been respected, you can lodge complaints with the CNIL.