

**OXO TECHNOLOGIES HOLDING PRIVATELY HELD LTD.**  
**PRIVACY POLICY EXTRACT FOR APPLICANTS**

Effective from ... December 2020.

**I. INTRODUCTION**

**OXO Technologies Holding Privately Held Ltd.** and **OXO Labs Üzletviteli és Tanácsadó Korlátolt Felelősségű Társaság** are members of OXO Group and are affiliated companies and proceed jointly and in close cooperation concerning their activities of funding and accelerating, therefore they constitute as Joint data controllers. "Joint data management", means that several data controllers process personal data together for a common purpose, so it is appropriate to jointly define and adopt their data management rules. Joint data controller quality means that the purpose and means of data management (internal processes, content of forms used, content of shared databases) are defined jointly, and both data controllers have access to the data they jointly manage. Accordingly, in the case of the data processing operations included in this advisory, the data controller is **OXO Technologies Holding Privately Held Ltd.** and **OXO Labs Üzletviteli és Tanácsadó Korlátolt Felelősségű Társaság** together (hereinafter collectively referred to as the "**Companies or the Data Controller or Data Controllers**"). Also in certain data processing besides the above Data Controllers the investors (hereinafter: Investors) participating in the funding will also act as joint data controllers in addition to the above Data Controllers, such circumstances are indicated at the relevant data processing below as listing the Investors as Recipient of data. Due to the high number of investors we cannot indicate them all in this policy by name, the full list of investors are available at <https://oxoholdings.eu/#investors>

Companies hereby inform those applicants who register at "**Apply at OXO Ventures**" section of <https://oxoholdings.eu/> website and those whose data are shared by the applicants as part of the application process (hereinafter referred to as "**Data Subjects**") in relation to the processing of their personal data provided in the course of their application for funding and the process of granting the fundings to these applicants in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "**GDPR**") and the Act CXII of 2011 on Informational Self-determination and Freedom of Information. The terms used in this Privacy Policy (hereinafter referred to as "**Policy**") are the same as those in the GDPR. **Please note that the data processing is mainly completed in the OXO IT System** (hereinafter: "**System**"), **which is an internet-based platform developed by OXO Labs Kft. and its affiliates and subcontractors, for the sole purpose of managing the applications and administration of the fundings.**

**Please be informed that providing the personal data is always voluntary, but if the required personal data is not provided then the application for the funding cannot be considered.**

Pursuant to Article 13 of the General Data Protection Regulation (GDPR), by making this Privacy Policy extract available, we hereby disclose the following

information (this Privacy Policy extract is a brief extract of the Data Controllers' Privacy Policy (the "Policy"). The provisions of the Privacy Policy and the relevant legal regulations shall apply to the issues and topics not covered in this extract, and this extract shall be read and understood in conjunction with them.)

The up-to-date version of this extract of Privacy Policy is available at: <https://oxoholdings.eu> The Data Controller reserves the right to amend its Privacy Policy at any time. The amendments will be published by displaying the consolidated version.

**In any case, please read the present Privacy Policy extract and its amendments in order to have a complete understanding of the rules governing our data management.**

## **II. DETAILS OF THE DATA CONTROLLERS**

**The publisher of the present Policy and the Data Controllers are:**

### **DATA CONTROLLER I.:**

**OXO Technologies Holding Privately Held Ltd./OXO Technologies Holding Zártkörűen Működő Részvénytársaság**

**Registered address: 1023 Budapest, Lajos utca 28-32. II. em. 1.**

**Taxation number: 27306660-2-41**

**Company registry number: 01-10-140670**

**Phone: 06 1 209 3094**

**Email: [info@oxoholdings.eu](mailto:info@oxoholdings.eu)**

**Representative of Data Controller I: dr. Oszkó Péter board director (tel: 06 1 209 3094 e-mail: [oszko.peter@oxolabs.eu](mailto:oszko.peter@oxolabs.eu))**

### **DATA CONTROLLER II.:**

**OXO Labs Üzletviteli és Tanácsadó Korlátolt Felelősségű Társaság**

**Registered address: 1023 Budapest, Lajos utca 28-32.**

**Taxation number: 24992165-2-41**

**Company registry number: 01-09-193434**

**Phone: 06 1 209 3094**

**Email: [info@oxolabs.eu](mailto:info@oxolabs.eu)**

**Representative of Data Controller II: dr. Oszkó Péter managing director (tel: 06 1 209 3094 e-mail: [oszko.peter@oxolabs.eu](mailto:oszko.peter@oxolabs.eu) )**

### III. INDICATION OF DATA PROCESSORS

In the course of our activity, based on a contractual relationship, we receive the services of the following data processors:

Activity	Name	Seat address	Company reg. number	Phone number	Email
Portfolio managing	OXO Ventures Zrt.	1023 Budapest, Lajos utca 28-32.	01-10-049202	06 20 984 5387	oszko.peter@oxoholdings.eu
Server provider	Servergarden Kft.	1023 Budapest, Lajos utca 28-32. II. em. 1.	01-09-350297	06 1 432 3133	<a href="mailto:info@servergarden.hu">info@servergarden.hu</a>
Website operator	OXO Labs Kft.	1023 Budapest, Lajos utca 28-32.	01-09-193434	06 20 984 5387	info@oxolabs.eu
IT system operator	OXO Labs Kft.	1023 Budapest, Lajos utca 28-32.	01-09-193434	06 20 984 5387	info@oxolabs.eu
Video interview system	Indivizo Zrt.	1123 Budapest, Alkotás utca 17-19	01-10-049785	06 1 778 1226	<a href="mailto:hello@indivizo.com">hello@indivizo.com</a>
Accountancy service provider	RSM Hungary	1139 Budapest, Váci út 99-105. Balance Hall. ép. IV. em.	01-10-045727	06 1 886 3701	info@rsm.hu
Legal service provider	DLA Piper Business Advisory Kft.	1124 Budapest, Csörsz utca 49-51.	01-09-334862	06 1 510 1100	businessadvisory-hungary@dlapiper.com
Legal service provider	Polgár és Bebők Ügyvédi Iroda	1011 Budapest, Szilágyi Dezső tér 1. 2. em.	00 18 246795	06 1 799 8332	admin@hunlaw.hu

Auditor	TRUSTED ADVISER Kft.	1082 Budapest, Baross utca 66-68. 3. em. 11.	01-09-279282	06 20 966 5652	office@trustedadviser.hu
Marketing and PR consultant	Jánoska Rita Zsófia	9400 Sopron, Deák tér 22.	50554982	06 30 578 4854	rita.janoska@itbn.hu
Tender consultant	dr. Szilágyi András	1147 Budapest, Huszt utca 44. 3/1	52114764	06 70 377 3847	dr.andras.szilagyi@gmail.com
Electronic signature interface provider	Trustchain Systems Kft.	1133 Budapest, Gogol utca 26. 1. em	01-09-294941	06 70 218 5977	info@trustchain.com
Billing provider	KBOSS.hu Kft.	1031 Budapest, Záhony utca 7.	01-09-303201	06 30 354 4789	kboss@kboss.hu
Office renting	OXO Services Kft.	1023 Budapest, Lajos utca 28-32.	01-09-208466	06 30 713 1373	bojtor.tamas@oxoholdings.eu

#### **IV. SOURCE OF DATA**

**During the application process, the founder/applicant has to present own personal data, in which case the source of the data is the data subject. Also, during the application process the applicant is required to share certain personal data of his/her team members, in which case the source of the data is the applicant. The applicant is solely responsible to have due authorization to transfer such personal data of his/her team members to Data Controllers and to acquire consent of such persons, if the transfer of data is based on the consent of the given persons.**

#### **V. DATA MANAGEMENT**

The Data Controller, in the context of its funding activities, performs the following data management activities listed below separately for transparency purposes by indicating the description of data processing, type of the data processed, the purpose of the data management, the legal basis, the source of the data, the recipients of the data management and the duration of data storage in a chart format.

### 1. Registration at OXO IT system:

Applicants as founders (hereinafter: “**Founders**”) who have tech innovation and would like to present it before leading angel and institutional investors, enter selected acceleration and mentoring programs or apply for various stages of funding, with clicking the “Apply to OXO Ventures” button on the website <https://oxoholdings.eu/> have a possibility to apply for funding by registering in the OXO IT system as Founder with their LinkedIn profile or Facebook profile.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Registration	<p><u>Data of Founders</u> LinkedIn or Facebook profile data</p> <p>(data which have been approved to be shared in LinkedIn/Facebook preferences - email address, phone number, photo, any other data registered in LinkedIn/Facebook)</p> <p>E-mail address confirmation</p>	Providing an easily accessible platform of communicating	Given consent (GDPR Article 6. (1) a))	Data Subject Facebook/LinkedIn	<p>Portfolio management services provider, as Data Processor</p> <p>Server provider, as Data Processor</p> <p>Website operating services provider as Data Processor</p> <p>IT system provider as Data Processor</p>	<p>In case a project application is not submitted immediately, then registration data is stored until withdrawal of consent (registration can be deleted at any time); also, in case of inactivity in the profile for 6 months the registration data is deleted after 6 months counted from last login.</p> <p>In case the application is submitted, then the registration data will continue to be stored as per point 2. below.</p>

**2. Filling up company information sheet/application for funding:**

**Founders after registering themselves into the System can apply for funding by filling up a form, giving detailed information (free text) about their project, such as: project name; logo; cover; focus** (select option from a list: 3D technologies, Agricultural Technologies, Augmented/Virtual Reality, Clean Technologies, Cloud Technologies, Community Developments, Cybersecurity, Data & Analytics, E-Commerce & Marketplaces, E-Sport/E-Gaming, Financial Technologies, HR Technologies, Innovative Construction, Internet of Things, Medical Technologies, Property Technologies, Sharing Economy Solutions, Smart Healthcare, Sustainable Developments, Tourism & leisure, Transport & Mobility, Wearables); **choose from project/company origin country; founder’s role; stage** (Idea, Development, Prototype, Launched); **summary; description; website; youtube video; capital raised** (None, Angel, Seed, Series A, Series B), founding needed (Not seeking, Angel, Seed, Series A, Series B); **amount of the needed founding in Euros; market; competitors; product description; revenue streams; team** (can write names, education/startup background, position, business share of each member, entrepreneurial background); **upload documents** (one pager, pitch deck, business plan, financial model, other documents). **From the above information only the data of the Founder and the team members are considered personal data.**

If you upload any further documentation, which is not absolutely necessary but you still want to share, then before uploading please consider privacy, and only share personal information if you are duly authorized to do so, because in such case you will be responsible for sharing the information.

<b>Description of data processing</b>	<b>Data type</b>	<b>Purpose of data processing</b>	<b>Legal basis</b>	<b>Source of data</b>	<b>Recipients</b>	<b>Duration of data storage</b>
Project application	Above listed documents and related information (free text, and videos), especially:  Founder’s profile, and information on team members (names, education/startup background, position, business share of each member, entrepreneurial	Seek and select applications for funding	Legitimate interest of collecting and selecting applications for providing funding activities - as general business activity (GDPR Article 6. (1) f)	Data Subject  Concerning data of shareholders and team members the source of the data is the Applicant/Founder	Portfolio management services provider, as Data Processor  Server provider, as Data Processor  Website operating services provider as Data Processor  IT system provider as Data Processor	In case of rejection, we delete the founder’s profile and submitted form after 5 years, if funding is provided then data will continue to be processed as per point 3. below.

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### 3. Rejection letter:

After the submission, OXO checks the submitted form and replies within the shortest possible time, this, however, may take 2-3 week due to internal processes. If OXO does not find the project as developed to be suitable for funding, a rejection letter will be sent to the Founder's email address. As an alternative possibility of mentoring or other support may be offered by other members of the OXO Group where their own privacy policy shall apply.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Rejection letter	Name of Founder E-mail address of Founder	Providing feedback to the application	Legitimate interest of providing feedback to applicants (GDPR Article 6. (1) f))	Data Subject	Portfolio management services provider, as Data Processor  Server provider, as Data Processor  Website operating services provider as Data Processor  IT system provider as Data Processor  E- mail service provider, as Data Processor  Archiving service provider as Data Processor	Rejection letters are saved together with Application data (i.e. for 5 years).

#### 4. Video interview:

In case OXO is interested in the project, a request for a video interview will be sent to the founder, via the System. The interview simulates a real personal interview situation as there is a certain time limit to answer the written questions. The interview records will be stored in the System.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Video interview	Video records (pictures and sound records) of the interview and its participants (Founder and team members).	Seek and select applications for funding - Completion of application.	Legitimate interest of collecting and selecting applications for providing funding activities - as general business activity (GDPR Article 6. (1) f)	Data Subjects: Applicant/Founder and team members participating in the interview	Portfolio management services provider, as Data Processor  Server provider, as Data Processor  Website operating services provider as Data Processor  IT system provider as Data Processor  Interview software provider, as Data Processor	Video interviews are saved together with Application data (i.e. for 5 years).



## 5. Signed Term sheet

After watching the interview, the Board will decide if they wish to continue the process with the project/company and in case of their approval, the negotiations on the Term sheet will be started. If agreement is reached then a written Term sheet is signed, which is a preliminary draft agreement with the condition precedents necessary to be fulfilled for the final funding agreement.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Term sheet	Content of Term sheet: from which data of the representatives of the contracting parties (Name, position title, business contact data, signature) as well as the shareholders of the company and key personnel of the applicant company (name and position) constitute as personal data.	Take steps to enter into a contract, determine possible contract terms	<p>In case of representatives of the contracting parties:</p> <p>Performance of contract - to take steps at the request of the data subject prior to entering into a contract (GDPR Article 6. (1) b))</p> <p>In case of shareholders and key personnel who is not signing the documentation:</p> <p>Legitimate interest of clarification the terms of contract (GDPR Article 6. (1) f))</p>	<p>Data Subject</p> <p>Concerning data of shareholders and team members the source of the data is the Applicant/Founder</p>	<p>Portfolio management services provider, as Data Processor</p> <p>Server provider, as Data Processor</p> <p>Website operating services provider as Data Processor</p> <p>IT system provider as Data Processor</p> <p>Archiving service provider as Data Processor</p>	<p>In case of final funding agreement is concluded the Term sheet is stored attached to the final agreement (as per point 7. below)</p> <p>In case of final funding agreement is not concluded the Term sheet is stored for 5 years after signature.</p>

## 6. Due diligence phase, Due Diligence Report

After the Term sheet is signed, the due diligence phase is started in which OXO investigates the Company/Project more deeply to make the final decision on the investment. The Due Diligence review usually includes in depth review of legal, financial, employment relations. After the completion of the Due Diligence a Due Diligence Report is drawn.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Due Diligence - Due Diligence Report	<p><u>Data of Founders/ shareholders:</u> (name, address, date and place of birth, mother's maiden name, tax ID number, start of shareholder status, titles held in the company)</p> <p><u>Data of employees:</u> Content of employment contracts (name, date and place of birth, address, mother's maiden name, TAJ number, tax ID number, start of employment, any further personal data incorporated in employment contract)</p>	Completion of Due Diligence	Legitimate interest of completing the Due Diligence (GDPR Article 6. (1) f))	Data Subject Concerning data of shareholders, employees and contractors the source of the data is the Applicant/Founder	<p>Portfolio management services provider, as Data Processor</p> <p>Server provider, as Data Processor</p> <p>Website operating services provider as Data Processor</p> <p>IT system provider as Data Processor</p> <p>Archiving service provider as Data Processor</p> <p>Financial expert co-operating in the completion of the Due Diligence as Data Processor</p>	<p>In case of final funding agreement is concluded the Due Diligence data is stored attached to the final agreement (as per point 7. below)</p> <p>In case of final funding agreement is not concluded the Due Diligence data is stored for 5 years after signature.</p>

	<u>Data of Contractors of the company:</u> Content of contracts: (Representatives: name, title, signature, Contact persons: name, business phone number, e-mail)  Content of the Due Diligence Report				Legal expert co-operating in the completion of the Due Diligence as Sole Data Controller	
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**7. Investment phase: Pool contract and company modification documentation**

After the successful due diligence process, the funding is provided by the way of Data Controller acquiring business shares in the funded company (hereinafter: **“Funded Company”**). Therefore, the pool contract and the necessary company modification documentation will be made and signed by the Parties with the content as required by the Court of Registration.

<b>Description of data processing</b>	<b>Data type</b>	<b>Purpose of data processing</b>	<b>Legal basis</b>	<b>Source of data</b>	<b>Recipients</b>	<b>Duration of data storage</b>
Final funding documentation - pool contract, and company modification documentation	<u>Shareholders of the Funded company:</u> name, address, date of birth, mother’s maiden name, tax ID number, start date of membership	Completion of documentation of investment and documentation required for company modification	Performance of contract (GDPR Article 6. (1) b)	Data Subject  Concerning data of shareholders Representatives who is not the Founder, the source of the data is the	Portfolio management services provider, as Data Processor  Server provider, as Data Processor	Until the existence of Data Controller

	<p><u>Representatives of the Funded company:</u> name, address, date of birth, mother's maiden name, tax ID number, start date of service</p>			<p>Applicant/Founder</p>	<p>Website operating services provider as Data Processor</p> <p>IT system provider as Data Processor</p> <p>Archiving service provider as Data Processor</p> <p>Legal expert co-operating in the completion of the documentation and company modification as sole data controller</p> <p>Court of Registration as sole data controller</p> <p>The data will become public company data and will be publicly made available in the Company Register therefore unidentified third persons can see and have access to the data</p>	
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## 8. Reportation phase

After the successful investment, based on the data supplied by the funded company a monthly status report is drawn on the progress of the Project.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Monthly reports	Representative of the Funded Company Name of the Shareholders of the Funded Company	Follow-up of contract progress	Performance of contract (GDPR Article 6. (1) b)	Funded Company	Archiving service provider as Data Processor  E-mail service provider  Portfolio management services provider, as Data Processor  Server provider, as Data Processor  Website operating services provider as Data Processor  IT system provider as Data Processor  Investors as joint data controllers	5 years after exiting from the Funded Company

Documents / data containing the Data Subject's consent may be presented / handed over to the authority during an incidental data protection authority investigation.

## **VI. INFORMATION ON THE RIGHTS OF DATA SUBJECTS**

**In relation to the present data management procedures, the Candidate is entitled to the following rights:**

1. **Right of access to your personal data:** You have the right to receive feedback from the Data Controller about whether your personal data is being processed and, if such data is being processed, you are entitled to have access to your personal data and all the relevant statutory information. Therefore, you have the right to contact the Data Controller and request information about your data management and request access to your data.
2. **Right of rectification:** In the event of a change in your data, you may at any time request rectification of your data by providing correct information.
3. **Right to the erasure of data:** You are entitled to request the Data Controller to delete your data if the data management is no longer necessary for the purpose for which the data were recorded, if the processing is unlawful or if the deletion is required by law.
4. **Right to restrict data management:** You may request a restriction of data management if the data processing is unlawful or if the Data Controller no longer needs the data for the purpose of data management, but you wish to use it for the submission of a legal claim. Restricting data management means that the data can only be stored until the restriction is lifted and can only be used to bring a legal claim.
5. **Right to object to processing of personal data:** You are entitled to object to the processing of your personal data at any time for reasons related to your own situation. In such a case, the Data Controller will individually examine whether there is a legitimate reason justifying the need for data management.
6. **Right to data portability:** You are entitled to receive from the Data Controller the personal data it processes about you, in a structured, commonly used and machine-readable format and you shall have the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided. When exercising the right to portability of data, you are entitled to request, if technically feasible, the direct transmission of personal data between controllers.
7. **Right to file a complaint to the Supervisory Authority:** You are entitled to file a complaint with the National Authority for Data Protection and Freedom of Information. (Contact: 1055 Budapest, Falk Miksa utca 9-11., 1363 Budapest, Pf. 9.; phone: +36 1 391-1400; telefax: +36 1 391 1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu))
8. **Judicial Enforcement:** You have the right to apply to the court if you consider that the Data Controller or the Data Processor acting on its behalf or acting on

its instructions manages your personal data in violation of the requirements for the processing of personal data.

9. **Right to withdraw consent:** in case of consent based data processing the consent may be withdrawn at any time by written notice sent to [info@oxoholdings.eu](mailto:info@oxoholdings.eu) or by telephone, calling the following number: 06 1 209 3094 The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

## **VII. DATA SECURITY**

The Data Controller shall ensure data security. For this purpose, it shall take such technical and organizational measures and establish the procedural rules necessary to enforce the applicable laws, data and confidentiality rules. The Data Controller protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against unavailability due to accidental destruction and damage and against becoming inaccessible due to a change in the technique used.

The Data Controller shall also provide for the enforcement of the data security rules by means of internal rules, instructions and procedural rules separate from the contents of this Policy. The Data Controller takes into account the state of current technology in the definition and application of data security measures and chooses more than one possible data management solution that provides a higher level of protection for personal data unless it would constitute a disproportionate difficulty.

### **Automated decision-making, profiling**

Please note that we do not use automated decision-making or profiling during the selection process.

If you have any questions regarding the management of your personal data, please contact us at [info@oxoholdings.eu](mailto:info@oxoholdings.eu)