

## Privacy Policy

As of August 21, 2018

This Privacy Policy is designed to assist you with understanding how EcoStart ("EcoStart", "Ecostartfound OÜ", address: Tallin,Pohja-Tallina Linnaosa, Pandla tn 13-201, 10315 ""we", "us" or "our, Company") collect, use and disclose the information you provide us when accessing or using the website, eco-start.com.

Data protection is of a particularly high priority for us. The use of our Website is possible without any indication of personal data; however, if you want to use services via our Website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from you.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the EU General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the Company. By means of this data protection declaration, our Company would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, we have implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this Website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

### **I. Definitions**

This Privacy Policy of the Company (the "Privacy Policy") is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation ("GDPR"). Our Privacy Policy should be legible and understandable for the general public, as well as our contributors and business partners. To ensure this, we would like to first explain the terminology used.

In this Privacy Policy, we use, inter alia, the following terms:

#### **a) Personal data**

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### **b) Data subject**

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

### **c) Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. 10 | 10

### **d) Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

### **e) Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

### **f) Pseudonymisation**

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

### **g) Controller or controller responsible for the processing**

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

### **h) Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### **i) Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union

or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

#### **j) Third party**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

#### **k) Consent**

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

### **II. Name and Address of the controller**

Controller for the purposes of the GDPR, other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Ecostartfound OÜ”, [ecostart2018@gmail.com](mailto:ecostart2018@gmail.com)

### **III. Collection of general data and information**

This Website collects a series of general data and information when you or automated system calls up the Website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Website, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, the Company does not draw any conclusions about you. Rather, this information is needed to (1) provide our products and services, including this Site, and improve them over time, (2) deliver the content of our Website correctly, (2) optimize the content of our Website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, (4) personalize and manage our relationship with you, including introducing you to products or services that may be of interest to you, (5) investigate, respond to, and manage inquiries or events, and (6) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the Company analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

#### **IV. Legal basis for the processing**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain 10 | 10 consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If our Company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

#### **V. Registration on the Website**

You have the possibility to register on the Website with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors that also uses personal data for an internal purpose which is attributable to the controller. By registering on the Website, the IP address, date, and time of the registration are also stored. The storage of this data is necessary to secure the Company as controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution. The Company provides information upon request to you as to what personal data are stored about you. Also, we correct or erase personal data at the request or indication of you, insofar as there are no statutory storage obligations. The Data Protection Officer (as indicated in paragraph I.c) is available to you in this respect as contact person.

#### **VI. Subscription to our newsletter**

On the Website, users are given the opportunity to subscribe to our newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the

newsletter is ordered from the controller. The Company informs its customers and business partners regularly by means of a news- letter about enterprise offers.

The Company's newsletter may only be received by you if (1) you have a valid e-mail address and (2) you register for the newsletter shipping. A confirmation email will be sent to the e-mail address registered by you for the first time for news- letter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by you at any time. The consent to the storage of personal data, which you have given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter.

## **VII. Newsletter-Tracking**

The newsletter of the Company contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the Company may see if and when an email was opened by you, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the Company in order to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. You are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt- in procedure. After a revocation, these personal data will be deleted by the controller. The Company automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## **VIII. Contact possibility via the website**

The Website contains information that enables a quick electronic contact to our Company, as well as direct communication with us, which also includes a general address of the so called electronic mail (e-mail address). If you contact the Company by e-mail or via a con- tact form,

the personal data transmitted are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

IX. Routine erasure and blocking of personal data The Company processes and stores the personal data of the data subjects only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the Company may be subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## **X. Rights of the data subject**

### **a) Right of confirmation**

You have the right to obtain from the Company the confirmation as to whether or not personal data concerning you are being processed. If you wish to avail yourself of this right of confirmation, you may, at any time, contact the Data Protection Officer (see paragraph I.c).

### **b) Right of access**

You have the right to obtain from the Company free information about your personal data stored at any time and a copy of this information (including the purpose of processing, categories of personal data concerned, storage period, and more). 10 | 10 Furthermore, you have a right to obtain information as to whether personal data are transferred to a third country or to an international organization. If this is the case, you have the right to be informed of the appropriate safeguards relating to the transfer.

If you wish to avail yourself of this right of access, you may at any time contact the Data Protection Officer (see paragraph I.c).

### **c) Right to rectification**

You have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If you wish to exercise this right to rectification, you may contact the Data Protection Officer (see paragraph I.c).

### **d) Right to erasure (Right to be forgotten)**

You have the right to obtain from the Company the erasure of personal data concerning you with undue delay, and the Company has the obligation to erase personal data without undue delay, as long as the processing is no longer necessary. You may at any time contact the Data Protection Officer. The Data Protection Officer shall promptly ensure that the erasure request is complied with immediately.

#### **e) Right of restriction of processing**

You have the right to obtain from the Company restriction of processing if the processing is unlawful, if you contest the accuracy of your personal data or your personal data is no longer needed by the Company.

If you wish to request the restriction of the processing of personal data stored by the Company, you may at any time contact the Data Protection Officer (see paragraph I.c).

#### **f) Right to data portability**

You have the right to receive from the Company, the personal data concerning you, in a structured, commonly used and machine-readable format. You have the right to transmit those data to another controller without hindrance from the Company, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

#### **g) Automated individual decision-making, including profiling**

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, the Company shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decisionmaking, he or she may at any time directly contact our Data Protection Officer.

### **XI. Data protection provisions about the application and use of Twitter**

On Website, the Company has integrated components of Twitter. Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so called 'tweets,' e.g. short messages, which are limited to 140 characters. These short messages are available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who

follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets.

The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES.

Twitter receives information via the Twitter component that the data subject has visited our website, provided that the data subject is logged in on Twitter at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data subject, then he or she may prevent this by logging off from their Twitter account before a call-up to our website is made.

The applicable data protection provisions of Twitter may be accessed under <https://twitter.com/privacy?lang=en>.

## **XII. Data protection provisions about the application and use of Google Analytics**

On this Website, we have integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a costbenefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

## **XIII. Period for which the personal data will be stored**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

## **XIV. Existence of automated decision-making**

We may analyze your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively.

If you wish to exercise your rights stated in paragraph XI, concerning automated individual decision-making, you may at any time directly contact our Data Protection Support Team.