

# OPEN HORIZONS Privacy Policy

This Privacy Policy applies to OPEN HORIZONS project and it governs personal data processing and protection. Open Horizons is a programme to open the access to women-led digital & deep tech startups to new opportunities under the umbrella of corporations in Europe. It aims to identify key industry challenges, scout groundbreaking women-led startups, and facilitate collaboration with corporate partners. The program provides strategic support and accelerates startup growth.

## About us

Your personal data is processed by the Controller and Joint Controllers listed below (referred to as “we” or “us”). We undertake to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (‘GDPR’).

1. **Personal data Controller** is Pedal Consulting s.r.o., with its registered office at Bjornsonova 4807/5, 036 01 Martin, IČO: 46986111, DIČ: 2023677018, (hereinafter referred to as the Company or the Operator) represented by Mr. Róbert Miškuf, Managing Director. The Controller has appointed a **Data Protection Officer**, which is Dimensions Consulting Services s.r.o., Zámocká 18, 811 01 Bratislava. The contact person is Ms. Martina Javůrková. DPO contact details are [gdpr@pedal-consulting.eu](mailto:gdpr@pedal-consulting.eu).
2. The partners listed below, process certain types of personal data for the purposes of the project as Joint Controllers pursuant GDPR art. 26. Each partner is responsible for the personal data they collect and process during their activities under the framework of the project:
  - **SPLOTOTECH SL (SPLORO)**, PIC 890190147, established in PARQUE TOMAS CABALLERO 2 SEXTO O, PAMPLONA 31006, Spain,
  - **INNOVX BUSINESS ACCELERATOR SRL (INNOVX)**, PIC 878442283, established in CALEA GRIVITEI 82 98 CORP PODIUM CAMERA E1 14 ETAJ 1 SECTORUL 1, BUCHAREST 010735, Romania,
  - **MIGROS TICARET ANONIM SIRKETI (MIGROS)**, PIC 911730549, established in ATATURK MAH TURGUT BULVARI NO7 ATASEHIR, ISTANBUL 34758, Türkiye,

We ensure that your personal data is:

- processed lawfully, fairly and in a transparent manner in relation to the data subjects;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed and
- processed in a manner that ensures appropriate security of the data.

We may grant access to your personal data only if it is strictly necessary for implementing, managing and monitoring the Agreement. All our personnel is under a confidentiality obligation.

## How we collect your personal data

We obtain personal data directly from you in a variety of ways, mainly in following cases:

1. You subscribed to our newsletter/s;
2. You register to attend meetings and events we host and during attendance at such events;
3. We have established cooperative relationships with you;
4. We provide you professional services pursuant to Open Horizon project;
5. You participated in an interview, survey or other activity organised by us.

We may obtain personal data indirectly from:

1. Consortium and Corporate members;
2. public and open data sources such as public registers, news articles and internet searches;
3. social and professional networking sites (e.g., LinkedIn).

## What types of personal data we collect and how we use them

We only collect the data that are necessary for the smooth implementation of Open Horizons project and providing you services and support within its scope.

- Contact details: name, surname, e-mail, phone number
- Professional information: job title and/ or employer
- Demographics: age, gender, nationality
- Videos, photos or voice recordings including during our events; they are always taken from a distance as a group photo / video with the aim just to capture an atmosphere and respectful to your personal integrity and human dignity.
- Screenshots of online meetings, training, conferences etc.

We use your **contact details** for **contacting** you, sending you information about current or future events, organisational information, questionnaires and similar communications. As for **photos and videos** we might share them on our social media profiles. If requested, we share them with the European Commission officer responsible for reporting. Demographics data might be used for reporting purposes as per Grant Agreement we are bound to comply with.

## Legal basis for personal data processing

We process your personal data based on legal basis pursuant to GDPR art. 6.

### Your consent - GDPR Art. 6 (1)(a)

- We might ask you to provide us consent for processing your personal data for processing activities such as organisation of surveys and interviews, completing questionnaires and dissemination of project's results. The extent of personal data we process is defined in each consent. **Your consent is always voluntary and you can withdraw it any time without any legal or other consequences.**

### Our legal obligations - GDPR Art. 6 (1)(c)

- We process personal data based on legal obligations when we are required to comply both with national and European law as well as with the specific legal and regulatory framework of the Horizon Europe Framework Programme for Research and Innovation of the European Union.

### Our legitimate interest - GDPR Art. 6 (1)(f)

- It is our legitimate interest to participate in EU grants, projects and programs. However, the contracts and agreements enabling us apply and use the funds from the EU grants, projects and programs, requires us to **report processes and outcomes** as well as to further compliance related to the **project's publicity** obligations.
- It is our legitimate interest to protect and defend our legitimate rights and legal claims.

## How long we retain your personal data

Please note that we have an obligation to retain data concerning projects funded by the Horizon Europe Framework Programme for Research and Innovation of the European Union for up to five years after the end of the project (unless further retention is requested by auditors). After the expiration of the retention period, and unless further legitimate grounds for retention arise, we will dispose of personal data in a secure manner.

Those other legitimate grounds could be protecting our legal rights in a possible lawsuit, as part of legal or criminal proceedings or an insurance event.

## Third party access

We may occasionally share personal data with trusted partners and service providers to help us deliver efficient and quality services. When we do so, we ensure they are contractually bound to safeguard the data we entrust to them before we share the data. Our trusted partners include:

- Parties that support us as we provide our services (e.g., cloud-based software services such as Dropbox, Microsoft SharePoint, Google);
- Our professional advisers, including lawyers, auditors, and insurers;
- Dissemination services providers (e.g., MailChimp);
- Law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with applicable law or regulation;
- The European Commission according to our relevant contractual obligations;
- Program corporate Partners listed on the website.

### Transferring your personal data outside the EU / EEA

Our website and e-mail storage and their backups are on Slovak and/or EU servers. We use the services of a Slovak provider with relevant contractual and technical guarantees. Although we try to set up the processing of personal data in such a way that there is no transfer of personal data to third countries outside the European Economic Area, for the purpose of promoting our services online, a transfer takes place to the USA. With effect from 20 September 2023, the USA provides adequate guarantees in the protection of personal data based on Decision EK2023/1795.

For our consortium partner MIGROS based in Turkey, the regulating authority is the Turkish Data Protection Authority (TDPA) or Kişisel Verileri Koruma Kurumu (KVKK), who publishes guidelines that help clarify and further outline Turkey's data protection regime. GDPR applies to the processing of personal data in the context of the activities of an establishment of a controller or a processor in the Union, regardless of whether the processing takes place in the Union or not. As per Article 46 GDPR, the Controller may transfer personal data to a third country if the controller or processor has provided appropriate safeguards, and on condition that enforceable data subject rights and effective legal remedies for data subjects are available.

### Cookies

We use tools like Google Analytics to better understand how visitors interact with our website. This provides us with important information to enable the site to work better. The information collected doesn't lead to your personal identification. The analytical cookies are used based on your consent pursuant to GDPR 6 (1)(a).

Name	Typical content	Cookie expires after
_ga_*	This cookie is set by Google Analytics. This cookie is used to store and count pageviews.	2 years
_gat	Used to throttle request rate	1 minute
_ga	This cookie is set by Google Analytics. This cookie is used to distinguish users.	2 years

Apart from analytical cookies, technical and functional cookies are always enabled. These are necessary to operate a functional website, we use them based on our legitimate interest pursuant to GDPR 6 (1)(f).

Name	Typical content	Cookie expires after
__cf_bm	The cookie is set by cloudflare. This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	30 minutes
cookielawinfo-checkbox-analytics	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Analytics".	11 months

cookieLawInfo-checkbox-functional	The cookie is set by GDPR cookie consent to record the user consent for the cookies in the category “Functional”.	11 months
cookieLawInfo-checkbox-necessary	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category “Necessary”.	11 months
CookieLawInfo Consent	This cookie is set by GDPR Cookie Consent plugin. The cookie records the default button state of the corresponding category along with the status of CCPA.	11 months
viewed_cookie_policy	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.	11 months
wordpress_sec_COOKIEHASH	This cookie is set by wordpress. The cookie is set to provide protection against hackers, store account details.	session

## Your rights

You have the following rights regarding our processing of your personal data:

1. **Request access** to your Personal Data that processed by us (and/or request a copy of that Personal Data), as well as information on the processing of your Personal Data;
2. **Request correction** or update of your Personal Data processed by us, where it may be inaccurate or incomplete;
3. **Request erasure** of your Personal Data being processed by us, where you feel that the processing is unnecessary or otherwise unlawful;
4. **Request the restriction** of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing;
5. **Object to the processing** of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent us from processing your Personal Data;
6. **Withdraw** your consent to processing.

You can exercise your rights regarding personal data by e-mail to [gdp@pedal-consulting.eu](mailto:gdp@pedal-consulting.eu) or in writing at the headquarters address. All legitimate requests will be dealt with, and you will be informed about it in writing, within 30 days of their receipt.

If you believe that there is a violation of your rights in the processing of personal data or a violation of the Personal Data Protection Act or GDPR, you can submit a proposal to initiate personal data protection proceedings at the Úrad pre ochranu osobných údajov, Budova Park one, Námestie 1.mája 18, 811 06 Bratislava, Slovakia.

## Revisions of this Privacy Policy

This Privacy Policy is valid from 01/05/2025. We reserve the right to revise this Policy at any time. The current version will be always uploaded to our website indicating the date of entry into force, so you know when the most recent revision took place. If there are critical changes in this policy or our personal data practices change significantly in the future, we will notify you by posting the changes on our website.