

PRIVACY STATEMENT

Co-founders Oy (“**Co-founders**” or “**we**”) processes personal data of the users of the program focusing on management consulting called Lionhearts (“**Lionhearts**”) and the visitors of the website lionhearts.com (“**Website**”).

In this Privacy Statement, the word “**Services**” refers to Lionhearts program available through the Website. The word “**User**” or “**you**” refers to the person who has applied for the Service and/or has a user account in the Service. The word “**Client**” refers to third parties, who acquire our consulting service from Users.

Our Privacy Statement explains, for example, the types of personal data we process, how we process the personal data and how you may use your rights as a data subject.

Some of our services might be subject to a separate privacy policy. If a separate privacy policy applies to a particular service, we will post it in connection with the service in question.

This Privacy Statement may be updated from time to time in order to reflect the changes in data processing practices or otherwise. You can find the current version on the Website. We will not make substantial changes to this Privacy Statement or reduce the rights of the Users under this Privacy Statement without providing a notice thereof to the Users who have provided us with their email address.

This Privacy Statement applies to processing of personal data carried out by Co-founders as a data controller. For clarity we emphasize that this Privacy Statement does not address and is not applicable to the processing of personal data collected by the third parties. We encourage you to familiarize yourself with the privacy policies of such third parties.

1. Co-founders’ contact details

Name: Co-founders Oy
Company ID: 2779587-8
Correspondence address: Iso Roobertinkatu 3-5, 00120 Helsinki
Phone number: +358 50 599 3832
E-mail address: ia@Co-founders.com
<https://Co-founders.com/home/>

We kindly urge Users to use the addresses set out above for all correspondence related to the processing of personal data and the execution of Users’ rights under the applicable data protection legislation.

2. Personal data processed and sources of data

The personal data collected and processed by us in connection with your application process and use of the Services can be divided into two general data categories: User Data and Analytics Data.

User Data

User Data is personal data collected primarily directly from you while using or visiting the Service. We may collect User Data from our Users in a variety of ways, including, by email, in connection with the User’s use of the Services and/or when the User applies for the Services. We may collect User Data in two phases, first in application stage, and subsequently, if necessary, after we have accepted the User to our Services.

User Data that is necessary in order to apply for the Services

We may process the following User Data relating to the Users in application phase:

- name
- email

- date of birth
- address and contact details
- gender
- phone number
- application and curriculum vitae
- educational and professional background
- qualifications and skills (for example language skills)
- results of any test or evaluations carried out in connection with the recruitment
- marketing opt-ins and opt-outs
- information provided as part of your correspondence with us
- other data you have provided us in the application process.

User Data that is necessary to use the Services after the application is accepted

We may process the following User Data after the application is accepted:

- Information collected during the application phase (please see above)
- Username and password
- Profile picture
- Information regarding the education of the User
- Responsibilities, qualifications,
- Text created by User.
- Location
- Events User is participating in
- Events created by User
- Posts User has made
- Comments User has made

User Data you give us voluntarily

Your user or customer experience may be enhanced by providing us with the following information:

Additional Account Information:

- Phone number
- Social media accounts
- Bio
- Skills and attributes updated by the User to his/her profile

Analytics Data

The logging systems used by the Services automatically log certain Analytics Data when you visit the Services. Although we do not normally use Analytics Data to identify you as an individual, you can sometimes be recognized from it, either alone or when combined or linked with User Data. In such situations, Analytics Data can also be considered personal data under applicable laws and we will treat such data as personal data.

We may automatically collect the following Analytics Data when you visit or interact with the Services:

- **Device Information.** We collect the following information relating to the technical device you use when using the Services:
 - o device and device identification number, device IMEI
 - o country
 - o IP address
 - o browser type and version
 - o operating system
 - o name of your Internet service providers
 - o advertising identifier of your device

- **Usage Information.** We collect information on your use of the Services, such as:
 - o time spent in the Services
 - o interaction with the Services
 - o the time and date of your visits to the Services
 - o the sections of the Services you visited

Cookies

We use various technologies to collect and store Analytics Data and other information when the Users visit the Services, including cookies, pixel tags and web beacons.

Cookies are small text files sent and saved on your device that allows us to identify visitors of the Services and facilitate the use of the Services and to create aggregate information of our visitors. This helps us to improve the Services and better serve our Users. The cookies will not harm your device or files. We use cookies to tailor the Services and the information we provide in accordance with the individual interests of our Users.

The Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

[Safari](#)

[Google Chrome](#)

[Microsoft Edge](#)

[Mozilla Firefox](#)

Please note that some parts of the Services may not function properly if use of cookies is refused.

Web analytics services

The Website uses Google Analytics and other web analytics services to compile Analytics Data and reports on visitor usage and to help us improve the Website. For an overview of Google Analytics, please visit [Google Analytics](#). It is possible to opt-out of Google Analytics with the following browser add-on tool: [Google Analytics opt-out add-on](#).

3. Purposes and legitimate grounds for the processing of your personal data

Purposes

There are several purposes of the processing of your personal data by Co-founders:

To provide the Services

Co-founders processes your personal data to be able to offer the Services to you.

If you contact our customer service, we will use the information provided by you to answer your questions or solve your complaint.

For our legal obligations

Co-founders processes data to enable us to administer and fulfil our obligations under the law. This includes data processed for complying with our bookkeeping obligations and providing information to relevant authorities such as tax authorities.

For claims handling and legal processes

Co-founders may process personal data in relation to claims handling, debt collection and legal processes. We may also process data for the prevention of fraud, misuse of our services and for data, system and network security.

For customer communication and marketing

Co-founders processes your personal data to contact you regarding the Services and to inform you of changes relating to it. Your personal data may also be used for the purposes of marketing the Services and our other relevant services to you.

For quality improvement and trend analysis

We may also process information about your use of the Services to improve the quality of the Services e.g. by analyzing any trends in the use of the Services. In order to ensure that our services are in line with your needs, personal data can be used for things like customer satisfaction surveys. When possible, we will do this using only aggregated, non-personally identifiable data.

Legal grounds for processing

Co-founders processes your personal data primarily to pursue our legitimate interest to run, maintain and develop our business and to create and maintain client and other business relationships. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy and e.g. provide you with easy to use opt-out from our marketing communications and use pseudonymized or non-personally identifiable data when possible.

We may also process your personal data in order to comply with legal obligations.

In some parts of the Services, you may be requested to grant your consent for the processing of personal data. In this event, you may withdraw your consent at any time.

4. Transfer to countries outside Europe

Co-founders stores your personal data primarily within the European Economic Area. However, we have service providers in several geographical locations. As such, we and our service providers may transfer your personal data to, or access it in, jurisdictions outside the European Economic Area.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which they are processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the [Standard Contractual Clauses](#) or through other appropriate safeguards.

More information regarding the transfers of personal data may be obtained by contacting us on any of the addresses indicated above.

5. Recipients

We only share your personal data within our organization if and as far as reasonably necessary for the purposes of this Privacy Statement.

We do not share your personal data with third parties outside of Co-founders' organization unless one of the following circumstances applies:

For the purposes set out in this Privacy Statement and to authorized service providers

To the extent that our Clients need access to some of the User Data in order for us to properly perform the Services, we provide such third parties with your personal data. This data includes your name, date of birth, resumé, contact information, bio as well as a profile picture. Please note,

that the third parties process such User Data as independent controllers for their own purposes and in accordance with their own privacy policies.

Furthermore, we may provide your personal data to our affiliates or to authorized service providers who perform services for us (including data storage, accounting, sales and marketing) to process it for us.

When your personal data is processed by third parties as data processors on behalf of Co-founders, Co-founders has taken the appropriate contractual and organizational measures to ensure that your data are processed exclusively for the purposes specified in this Privacy Statement and in accordance with all applicable laws and regulations and subject to our instructions and appropriate obligations of confidentiality and security measures.

For legal reasons and legal processes

We may share your personal data with third parties outside our organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, crime, security or technical issues; and/or (iii) protect the interests, properties or safety of Co-founders, the Users or the public as far as in accordance with the law. When possible, we will inform you about such processing.

For other legitimate reasons

If Co-founders is involved in a merger, acquisition or asset sale, we may transfer your personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all the Users concerned when the personal data are transferred or become subject to a different privacy statement.

With your explicit consent

We may share your personal data with third parties outside Co-founders when we have your explicit consent to do so. You have the right to withdraw this consent at all times.

6. Storage period

Co-founders does not store your personal data longer than is legally permitted and necessary for the purposes of this Privacy Statement. The storage period depends on the nature of the information and on the purposes of processing. The maximum period may therefore vary per use.

Most User data shall be deleted after a reasonable period has lapsed following the User's account in the Service is deleted. Thereafter, some of the User Data may be stored by us only as long as such processing is required by law or is reasonably necessary for our legal obligations or legitimate interests such as claims handling, bookkeeping, internal reporting and reconciliation purposes. All User data shall be deleted within a period of 1 year after the User's account in the Service is deleted, with the exception of personal data required in certain rare situations such as legal proceedings.

We will store Analytics Data relating to the Services approximately 1 year.

7. Your rights

Right to access

You have the right to access and be informed about your personal data processed by us. We give you the possibility to request a copy of your personal data.

Right to withdraw consent

In case the processing is based on a consent granted by the User, the User may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use the Services.

The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to rectify

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us.

Right to erasure

You may also ask us to delete your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data.

Right to object

You may have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the provision of the Services or for compliance with a legal obligation. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the Services.

Right to restriction of processing

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use the Services.

Right to data portability

You have the right to receive the personal data you have provided to us yourself in a structured and commonly used format and to independently transmit those data to a third party.

How to use your rights

The abovementioned rights may be used by sending a letter or an e-mail to us on the addresses set out above, including the following information: the full name, e-mail address and a phone number. We may request the provision of additional information necessary to confirm the identity of the User. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

8. Direct marketing

The User has the right to prohibit us from using the User's personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by contacting us on the addresses indicated above or by using the functionalities of the Services or the unsubscribe possibility offered in connection with any direct marketing messages.

9. Lodging a complaint

In case the User considers our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection. In Finland, the local supervisory authority is the Data Protection Ombudsman (www.tietosuoja.fi).

10. Information security

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Measures include for example, where appropriate, encryption, pseudonymization, firewalls, secure facilities and access right systems. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability to restore the data. We regularly test the Services, systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects to the privacy of the Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.