

Starter Business Acceleration

PRIVACY POLICY

This is the privacy policy for “Starter Business Acceleration” (The Program). Starter Business Acceleration is a program launched by EDP - Energias de Portugal, EDP Inovação, EDP Energias do Brasil, EDP España, in conjunction with Beta-i and Beta-i Brasil (the Program Managers). Any reference to we, us or our in these terms is a reference to both the Program Managers and the Promoters unless otherwise stated.

We are committed to respecting the privacy of applicants to the program. The following statement explains how we may use the personal data we collect from you in connection with the application process. Personal data will be collected and processed for such purpose in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, hereinafter “GDPR”) and Law 58/2019, of 8 August 2019, as follows:

Data subjects are advised to read this information on their personal data processing carefully before using the application process. Data subjects shall represent and warrant that they are of age and that the data provided are true, accurate, complete and updated, and will be held accountable for any misrepresentations. When providing third-party data, data subjects shall represent and warrant that they notified the relevant third party of the terms and conditions and that they secured the third party's authorization to provide the third party's data for the specified purposes.

Data Controllers

The data controllers are the “Promoters” and the “Program Managers”, which includes the following companies:

- EDP - Energias de Portugal, S.A., listed company, registered with the Commercial Registry Office under the sole company and tax number 500 697 256, with registered office at Avenida 24 de Julho, 12, 1249-300 Lisbon, Portugal;
- EDP Inovação, S.A., registered with the Commercial Registry Office under the sole company and tax number 507 988 760, with head office located at Avenida 24 de Julho, 12, 1249-300 Lisbon, Portugal;
- EDP Energias do Brasil, with CNPJ 03.983.431/0001-03, with head office located at Rua Gomes de

Carvalho, 1996, 10, in São Paulo, Brazil;

- EDP España, S.A.U. with CIF A-33473752, and head office located at Oviedo, Plaza del Fresno, 2 33007 Oviedo –Spain.

The Program Managers are the following companies:

- Wildthriumphs, Lda (Beta-i) registered with the Commercial Registry Office under the sole company and tax number 514075228 , with registered office at Av. Duque de Loulé 12 7º, 1050-090 Lisbon, Portugal;
- Beta-i Brasil Consultoria em Inovação Empresarial, Lda with company number (CNPJ) 22.103.988/0001-57 and registered office at Av. Paulo VI, 621, Subsolo, Sala 2, São Paulo/SP, CEP: 01262-010, 2.

The Program Managers and Promoters are separate controllers which are working together to deliver the Program and nothing in these privacy policy is intended to suggest any other association between the Program Managers and the Promoters.

Scope

1. This privacy policy applies to any person submitting an application to participate in the program. This privacy policy does not apply to participation in the program itself, which is governed by separate terms which will be notified to you if you are invited to participate.

2. The Program Managers and the Promoters are separate controllers, and each is separately responsible for how process with your personal data received by submitting an application. In that case the Program Managers and the Promoters are each separate controllers according the GDPR.

3. Where you submit an application, this privacy policy applies in addition to our terms and conditions (<https://www.f6s.com/terms>). The submission of an application is conditional upon you agreeing with this privacy policy.

4. Applications are made through the F6S website. The F6S website has its own privacy policy (<https://www.f6s.com/privacy-policy>) which describes how F6S may use your personal information. If you decide to use the F6S website, you should review F6S’s privacy policy in addition to our own privacy policy. Please note that we are not responsible for the user account that you have registered with F6S. Further, we have no control over cookies placed on your device by F6S and we have no control over log files created by

F6S.

Personal Data

In the course of completing and submitting an application form and participating in the selection process you may provide us with personal data such as your name, address, date of birth, telephone numbers (including mobile number) and email address (personal data).

1.

This is information that we consider necessary so that we can properly consider your application. If you do not agree to us holding this information about you, please do not complete an application.

2. In completing the application form or participating in the application process you may choose to provide further personal data about yourself, team members or other associated people. It is entirely your decision as to whether you provide this type of information to us and you should only provide this information if you are comfortable with us storing it and using it to process your application as described in this privacy policy.

3.

Personal information relating to other people

1. It is possible that during the application process, for example whilst completing the application form or participating in program live, you may provide us with personal data about to other data subjects, such as team members or other people involved in your business or business idea.

2. Where you do provide us with personal data relating to other data subjects, it is essential that you: a) inform them that you will be providing their personal data to us; b) provide them with a copy of this privacy policy so that they are aware of how their personal data may be used and their rights in respect of it; and c) obtain their written consent (for example by way of email) to you disclosure the personal data to us.

3. By submitting personal data about other data subjects , you agree to indemnify us for any claim, fine or penalty that we may suffer (including any associated costs or expenses that we incur) as a result of your failure to comply with paragraph above.

Purposes and legal basis for the processing of personal data

1. We may use your personal data as follows:
 - a) to perform our obligations in respect of the handling of your application, including:
 - b) registering you on Promotor and Program Managers' databases;
 - c) considering your application to participate in the program; and
 - d) making arrangements with you to attend and participate in pitch day.

2. Where you have expressly consented to us doing so, including responding to any enquiry that you submit to us (in whatever form);

3. Where it is necessary for compliance with legal obligations, including for record keeping and regulatory compliance purposes; and

4. Where we otherwise have a legitimate interest in doing so, including:
 - a) promoting the program, to increase awareness of the program, our products, services and brands and your business;
 - b) updating you on relevant programs in addition to the one applied for, to promote awareness of those programs and encourage applications.

5. We may also contact you regarding investment or commercial opportunities that we consider may be of interest to you. We work with a wide range of companies and investors and, where it considers that a company or investor it is working with might be interested in learning more about you and your business or business idea it may pass non-personal information (such as information about your business) onto that company or investor.
 - a) If that company or investor is interested in learning more about you then we may request your permission to pass your personal information onto that company or investor but will not pass your personal information on unless and until you have agreed to this.
 - b) If you do not want us to contact you or pass your personal information on you can "opt out" by contacting us as described.

- c) Non-personal information that you submit may also be used for analytical or reporting purposes and anonymized reports may be published or otherwise provided to third parties.
- d) Please be aware that any part of pitch day, including the pitches and the interviews, may be recorded and a copy of any recordings we make may be published and circulated in all of the parties social media channels, internal communication, etc. If you take part in any relevant events and would prefer not be recorded please let us know and we'll ensure you are not included in any content.
- e) Where our processing of your personal data is based on consent, you have the right to withdraw this consent at any time, which you may do by contacting us.
- f) Please note however that the withdrawal of your consent will not affect any use of the data made before you withdraw your consent.

Recipients

1. We (and our representatives) may disclose your personal data to third parties:
 - a) for completing due diligence on you and your business or business idea (and, where appropriate, on your team or company);
 - b) to help find investment and commercial opportunities for you;
 - c) in publicity material, as described in the application terms;
 - d) to suppliers involved in the operation of the program, for example the operator of the venue where pitch day is held to make arrangements regarding your attendance or a creative agency involved in publicising the program;
 - e) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply such other terms as apply to our relationship, or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
 - f) if we determine that such disclosure is necessary in connection with any investigation or complaint regarding your application; and
 - g) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

2. The Program Managers and the Promoters may also share your personal data between them and with other companies in the Promoters's groups for the purposes of assessing and processing your application and arranging your participation in pitch day.

Data transfers to third countries

Promoters shall process the data subjects' data only within the European Economic Area and does not anticipate any data transfers to third countries. Exceptionally, and if strictly necessary for holding the Programme, the safeguards required by Chapter V of the GDPR shall be applied, namely by implementing standard contractual clauses.

Storage period

Promoters shall store the data subjects' personal data for 7 months period, without prejudice to the controllers being allowed to store the data beyond this period if required for purposes of defense in legal proceedings, or for a longer period for historical or statistical research purposes, in this case strictly for as long as indispensable, by implementing appropriate technical and organizational measures.

Incomplete applications

1. The F6S website offers you the opportunity to save incomplete applications prior to submission. It is important to be aware that where you save an incomplete application we can access that application and the information within it, even if you have not submitted it. It is therefore important that you do not save any information in the application form that you would not be comfortable with us seeing.

2. If your application remains unsubmitted after the closing date, we may nonetheless access your application and consider admitting it to the application process even though it was not submitted. By starting an application, you agree to us doing this. If we do decide that we are prepared to consider accepting your application we will let you know, and you will then be able to decide whether you want to proceed with it.

RESPONSIBILITY FOR F6S WEBSITE

Your application must be submitted via the F6S website. Please note that we are not associated with F6S (other than using its website to process applications) and we are not responsible for its website in any way. If you do choose to submit an application via the F6S website, you should ensure that you are agreeable to its terms of use and privacy notice and that you are comfortable with the security features that it has in place.

Data subjects’ rights

Data subjects may at any time, under the applicable laws, request access to their personal data, as well as their rectification, erasure and restriction of processing, withdraw consent, request the portability of their data, or object to processing, provided that the relevant legal requirements are met.

Users have the following personal data protection-related rights under the applicable laws:

Data Subject Rights	
Right of Access	The right to confirm which personal data are being processed and obtain a copy of such data. The right to obtain the above copy shall be without prejudice to third-party rights and freedoms, including business secrets or intellectual property rights, particularly any copyrights protecting the software.
Right to Rectification	The right to request that any inaccurate data be rectified or that any incomplete personal data be completed.
Right to Erasure	The right to secure the erasure of your personal data. This right shall not apply if the processing is required to comply with any statutory requirements to which EDP S.A. may be subject.
Right to Restriction of Processing	The right to request the restriction of processing of your personal data by requesting that the processing be suspended or that the scope of processing of certain data categories or of processing purposes be restricted.

Right to Portability	The right to receive the personal data provided to EDP S.A. in a commonly used and machine-readable digital format and the right to transmit those data directly to any new controller, if the data processing is based on the data subject's consent or the performance of an agreement.
Right to Object	The right to object to the data processing, for instance in the event of data processing for the purpose of sending marketing communications or of targeted online advertising, based on EDP S.A.'s legitimate interests.

The user may contact the Program Managers' Data Protection Officer at Beta-i, Av. Duque de Loulé 12 7º, 1050-090 Lisbon, Portugal or by email at francisca.faustino@beta-i.com, or the Program Managers at patricia.almeida@beta-i.com to exercise these rights.

The data subject is further entitled to lodge a complaint with the Comissão Nacional de Proteção de Dados (Portuguese Data Protection Commission) if he or she considers that his or her personal data have been breached.

Changes to the Privacy Policy

Promoters reserves the right to change these personal data processing terms and conditions at any time. The changes shall be duly disclosed on the Platform and notified using the contact details provided by the data subjects.