

## **DATA PRIVACY NOTICE**

Information pursuant to Art. 13 and 14 of the EU-General Data Protection Regulation ("GDPR")

### **1. Who is the responsible Controller for data processing and whom can you contact?**

#### **Responsible for data processing:**

Raiffeisen Bank International AG (hereinafter referred to as "Bank" or "RBI")

Am Stadtpark 9

1030 Vienna

Telephone +43 1 71707-0

E-Mail: [datenschutz@rbinternational.com](mailto:datenschutz@rbinternational.com)

#### **Contact data of the Data Protection Officer of the Bank:**

Werner Müller

Phone +43 1 71707-8603

E-Mail: [datenschutzbeauftragter@rbinternational.com](mailto:datenschutzbeauftragter@rbinternational.com)

### **2. Which data (or data categories) will be processed and which are the sources the processed data (categories) are derived from?**

- Personal data concerning the contact persons of your company (name, e-mail address, telephone number) which were made available to us by submitting your data on our Fintech Database
- Personal data from publicly available sources, e.g.: companies register, register of associations, land register, media
- Data that (in each case) have been submitted lawfully by other companies belonging to the Raiffeisen Banking Group or by any third party

### **3. What is the purpose and the legal basis for the data processing?**

By submitting data on the RBI Fintech Database the respective submitter agrees that RBI (the "Organizer") may disclose all information (including, without limitation, information about the submitted project) regarding the submitter or any of its affiliates of which the Organizer becomes aware or which is received by the Organizer as he considers necessary to any entity within the RBI group (Raiffeisen Bank Sh.a., Albania; Priorbank, JSC, Belarus; Raiffeisen Bank d.d. Bosna I Hercegovina, Bosnia Herzegovina; Raiffeisenbank (Bulgaria) EAD, Bulgaria; Raiffeisenbank Austria d.d., Croatia; Raiffeisenbank a.s. Czech Republic; Raiffeienbank Zrt, Hungary; Raiffeisen Bank Kosovo J.S.C, Kosovo; Raiffeisen Bank S.A, Romania; AO Raiffeisenbank, Russia; Raiffeisen Banka a.d. Serbia, Tatra banka, a.s., Slovakia; Raiffeisen Bank Aval JSC, Ukraine) or to the Austrian Raiffeisen banks (Raiffeisenlandesbank Niederösterreich-Wien AG; Raiffeisenlandesbank Oberösterreich Aktiengesellschaft; Raiffeisen-Landesbank Steiermark AG; Raiffeisenlandesbank Burgenland regGenmbH; Raiffeisenlandesbank Kärnten regGenmbH; Raiffeisenverband Salzburg regGenmbH; Raiffeisen-Landesbank Tirol AG; Raiffeisenlandesbank Vorarlberg regGenmbH) and the subsidiaries of RBI Group (Raiffeisen Bausparkasse Gesellschaft m.b.H.; Raiffeisen Kapitalanlage-Gesellschaft m.b.H.; Raiffeisen Centrobank AG; Raiffeisen e-force GmbH; Raiffeisen Factor Bank AG; Raiffeisen Informatik GmbH; Kathrein Privatbank Aktiengesellschaft; Raiffeisen-Leasing Österreich GmbH; Raiffeisen Property International GmbH; RSC Raiffeisen Service Center GmbH; Raiffeisen Software GmbH; Valida Holding AG; UNIQA Österreich Versicherungen AG, RBI Group IT GmbH; Raiffeisen Wohnbaubank

Aktiengesellschaft). Furthermore, to the respective contracted partners of RBI or any RBI-Network Bank, who are supporting the organization of the Elevator Lab initiatives, to the external mentors of the Elevator Lab initiatives (the external mentors, their company and their function can be found on <http://www.elevator-lab.com/mentors/>) and all organizational units within the Organizer. Submission of or uploads of personal data of natural persons (e.g. employees, shareholders, beneficial owner) requires the consent of the natural person. The submitter provides the consent to RBI upon request.

Any such disclosure is solely for the purpose of the implementation and the execution of the RBI FinTech Database and the Elevator Lab Partnership Program or for other purposes related to business with the submitter, including the beginning of such a business relationship, for purposes of any local Elevator Lab initiative in a RBI-Network Bank, or for investment evaluation by RBI or any RBI-affiliated investment vehicle.

The Submitter and/or the natural Person named by the submitter shall be entitled at any time to withdraw its consent to the future disclosure of information by way of a written (or e-mail) notice to: Raiffeisen Bank International AG, Am Stadtpark 9, 1030 Wien, Austria or to [startups@rbinternational.com](mailto:startups@rbinternational.com).

#### **4. Who will receive the data?**

- All departments as well as all staff (e.g. the Elevator Lab and Elevator Ventures Team) of RBI
- External mentors (the external mentors, their company and their function can be found on <http://www.elevator-lab.com/mentors/>) and contracted cooperation partners for any Elevator Lab initiative in a RBI-Network Bank or of the Elevator Lab Partnership program
- Any data processor assigned by RBI or any of RBI Group's affiliates to conduct the data processing activities (or certain parts thereof) to the necessary extent as they need the data to perform their respective service. All processors are contractually obliged to treat your data confidentially and to process the data for the provision of the respected services.
- All affiliates ("Network Banks") of the RBI group (Raiffeisen Bank Sh.a., Albania; Priorbank, JSC, Belarus; Raiffeisen Bank d.d. Bosna I Hercegovina, Bosnia Herzegovina; Raiffeisenbank (Bulgaria) EAD, Bulgaria; Raiffeisenbank Austria d.d., Croatia; Raiffeisenbank a.s. Czech Republic; Raiffeisenbank Zrt, Hungary; Raiffeisen Bank Kosovo J.S.C, Kosovo; Raiffeisen Polbank, Poland; Raiffeisen Bank S.A, Romania; AO Raiffeisenbank, Russia; Raiffeisen Banka a.d. Serbia, Tatra banka, a.s., Slovakia; Raiffeisen Bank Aval JSC, Ukraine)
- all Raiffeisen Banks in Austria („Landesbanken“)
- all subsidiaries of RBI Group (Raiffeisen Bausparkasse Gesellschaft m.b.H.; Raiffeisen Kapitalanlage-Gesellschaft m.b.H.; Raiffeisen Centrobank AG; Raiffeisen e-force GmbH; Raiffeisen Factor Bank AG; Raiffeisen Informatik GmbH; Kathrein Privatbank Aktiengesellschaft; Raiffeisen-Leasing Österreich GmbH; Raiffeisen Property International GmbH; RSC Raiffeisen Service Center GmbH; Raiffeisen Software GmbH; Valida Holding AG; UNIQA Österreich Versicherungen AG, RBI Group IT GmbH; Raiffeisen Wohnbaubank Aktiengesellschaft)
- any RBI-affiliated investment vehicle (e.g. Speedinvest)

#### **5. How long will the data be stored?**

After a period of 3 years the registration and provided information will be deleted, unless the Fintech updates the registration before the expiry date at 31.12. of each respective year.

## **6. What are your data protection rights?**

As data subject and with regard to the processing of your personal data you have the following rights:

- the right to request (from the controller) access to the data that are processed,
- the right to request (from the controller) the rectification or the erasure of (incorrect) data,
- the right of restriction of the data processing,
- the right to object to the data processing

Furthermore, as data subject, you have the right to lodge a complaint with the competent authority which in Austria is the "Datenschutzbehörde" (Data Protection Authority) at the following address: <https://www.data-protection-authority.gv.at/>

Raiffeisen Bank International processes your data in compliance with the European General Data Protection Regulation 2016/649 (GDPR). Information about your rights according to GDPR and how you can contact us can be found on our website [www.rbinternational.com/dataprotection](http://www.rbinternational.com/dataprotection)

## **7. Are you obliged to providing data?**

You must provide us with all personal we are required by law to collect. If you do not provide us with these data, we will generally decline either to conclude or to complete the contract, or we will be unable to execute an existing contract or we would be forced to terminate such contract. However, you are not obliged to give your consent to the processing of data if such data is not necessary for the performance of a contract or is not required by law or regulation.

In case the personal data has not been provided by the data subject itself, you have to provide the source, the personal data of the data subject has been derived from.

## **8. Is there automated decision-making?**

In general, we do not use fully automated decision-making within the meaning of Article 22 GDPR in order to establish and/or to conduct a business relationship. If we should use such procedures on a case-by-case basis, we will inform you accordingly by separate notice as so provided for by law.

## **9. Use of cookies**

Our website uses Cookies. Cookies are text files, which are saved during the visit on your terminal.

We mainly use Cookies for anonymized analysis about the use of the website. We also use Cookies to offer you additional functions on the website in order to interact easier with the website and to ensure an error-free use (e.g. to facilitate navigation on a website or to save your preferences and settings for your next visit)

Necessary Cookies: Cookies, which are necessary for the basic functions of the website, are used by us because of contract performance obligations.

Functional Cookies: Cookies, which allow us to analyze the use of the website, are used by us on the basis of legitimate interest.

Marketing Cookies: Cookies, which allow us to offer you advertisement tailored to your interests, are also used by us on the basis of legitimate interest.

Some Cookies are saved on your terminal until you delete them. They enable us to recognize your browser the next time you visit us. Most of the Cookies we use are deleted after your visit on our website (so called Session Cookies).

Cookies can be blocked, deactivated or deleted. Therefore, a variety of different tools are available (including browser controls and settings). You can find information hereto in the "help area" of the web browser you use. If all Cookies used by us are deactivated, upon others the display of the website may be limited.

### **JavaScript and tracking pixels**

Our website uses Cookies and other market-based web controls in particular to control and improve our internet presence (JavaScript and tracking pixels). The entire data are recorded anonymously. By using so-called tracking pixels we are able to collect information to check for which screen sizes, browsers and operating systems our internet presence should be optimized. JavaScript is a programming language for evaluating user interactions, modifying, reloading or generating content.

### **Raiffeisen Web Analytics**

This website uses the "Raiffeisen Web Analytics" software for anonymous analysis of website usage. Your IP address will be made anonymous for analysis purposes by deleting the last 8 bits immediately when a website is accessed. For this purpose Cookies are used which enable an analysis of the website usage by users. Through the evaluation of this data valuable knowledge about the needs of these users can be gained. This knowledge contributes to further improving the quality of our offer. You can prevent this by setting up your browser in a manner that no Cookies are saved.

Upon others we collect the following data: visited websites, date and time of the visit, length of stay, browser version, screen resolution, operating system, the country and the referrer, this is the previously visited page from which a page was accessed.

GRZ IT Center GmbH acts as IT service provider for us, processing your data only within the scope of the provision of services.

### **Google Analytics**

This website uses Google Analytics, a web analytics service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies, which are saved on your computer. We process your data based on our legitimate interest in setting up easy-to-use website access statistics (Art 6 (1) (f) GDPR). The information generated by the Cookie about your use of this website (including your anonymized IP address and pseudonymized ID as well as the URLs of the websites accessed) is transmitted to and stored by Google on servers in the USA. This website uses the given opportunity for IP-anonymization by Google Analytics. Your IP address will be

shortened by Google within the member states of the European Union or in other signatory states to the Agreement on the European Economic Area.

On our behalf Google will use this information, to evaluate the use of the website, to create reports about the website activities and to provide us with other services related to the use of the website and the internet.

You can prevent the general storage of Cookies by adjusting your browser software accordingly. However we point out that in this case you may not be able to use all functions of this website to their full extent.

You can also prevent Google from collecting your data in connection with Google Analytics by downloading and installing the browser plug-in available under the following link:

<http://tools.google.com/dlpage/gaoptout?hl=de>

For more information on Google's Terms of Use and Google's Privacy Policy, please visit

<http://www.google.com/analytics/terms/de.html>,

<https://policies.google.com/privacy/partners?hl=de> or <https://www.google.at/intl/at/policies/>.

## **Google Maps**

On our website we use the service Google Maps API. This service is a service of Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. By integrating the service on our website, at least the following data are transmitted to Google, Inc.: IP address, time of visit of the website, screen resolution of the visitor, URL of the website (referrer), the identification of the browser (user agent) and search terms. The data transfer is independent of whether you have a Google account that you are logged in or whether you do not have a Google user account. If you are logged in, the data will be assigned with your account. If you do not wish assignment to your profile, you must log out before activating the button. Google, Inc. stores this data as usage profiles and uses them for the purposes of advertising, market research and/or demand-oriented design of its website. You have the right to object to the creation of these user profiles, whereby you must contact Google Inc. to exercise this right. For more information about the purpose and scope of data collection and processing by Google, Inc., please contact [www.google.at/intl/de/policies/privacy/](http://www.google.at/intl/de/policies/privacy/). We do not process the affected data.

## **Record on the web server**

Every time a user accesses our website and every time a file is retrieved or attempted to be retrieved from the server, data about this process is stored in a log file. For us it is not directly recognizable, which user called upon which data. We also do not try to collect this information. This would only be possible in legally regulated cases and with the help of third parties (e.g. Internet service providers). In detail, the following data record is stored for each retrieval: The IP address, the name of the downloaded file, the date and time of the download, the amount of data transferred, the message as to whether the download was successful and the message as to why a download may have failed, the name of your Internet service provider, if applicable the operating system, the browser software of your computer and the website from which you are visiting us.

The legal basis for the processing of personal data is our legitimate interest (in accordance with Art 6 (1) (f) GDPR). This is to detect, prevent and investigate attacks on our website.

In addition, we process your personal data in special cases on the basis of the legitimate interests of us or legitimated third parties for legal proceedings or on behalf of legally authorized authorities or courts.

We generally store data for a period of three months to guarantee the security of our homepage. A longer storage only takes place as far as this is necessary to investigate determined attacks on our website or to pursue legal claims.

For the above-mentioned purposes, we have your personal data processed by the following service providers: Raiffeisen Informatik GmbH, GRZ IT Center GmbH, Raiffeisen Informatik Center Steiermark GmbH.