

PRIVACY POLICY

Starter Acceleration Program - PRIVACY NOTICE

*This is the privacy notice for “Starter Acceleration Program” (the **program**).*

*The program is organized by L Marks Limited and ACE (the **Program Manager** of the program), in conjunction with EDP Energias de Portugal, S.A and EDP Inovação S.A. (the **Promoter** of the program). Any reference to **we, us** or **our** in this notice is a reference to both the Program Manager and the Promoter unless otherwise stated.*

We are committed to respecting the privacy of users of the program website edpstarter.com/acceleration and applicants to the program. The following statement explains how we may use the personal information we collect from you in connection with your use of our Website and the application process.

The Promoters are registered in:

- *EDP -Energias de Portugal, S.A., with the Commercial Registry Office of Lisbon 500 697 256, with head office located at Avenida 24 de Julho, 12, in Lisbon*
- *EDP Inovação, S.A., with the Commercial Registry Office of Lisbon 507988760, with head office located at Avenida 24 de Julho, 12, in Lisbon*
- *EDP España, S.A.U. with CIF A-33473752, and head office located at Oviedo, Plaza del Fresno, 2 33007 Oviedo –Spain*
- *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*

The Program Managers are registered in:

- *L Marks is registered in England and Wales with company number 7756651. The Program Manager’s registered office address is 20 Broad Lane, Hale, Altrincham, Cheshire, WA15 0DF.*
- *ACE is registered in Brazil with company number (CNPJ) 12580915 000100. The Program Manager’s registered office address is Rua Vergueiro, 1061 - Liberdade, São Paulo - SP, 01504-001*

APPLICABILITY OF THIS NOTICE

1. *This notice applies to any person accessing our Website and to any person submitting an application to participate in the program. This notice 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 Manager and the Promoter are separate entities, and each is separately responsible for how it deals with your personal information.*
3. *Where you submit an application, this privacy notice applies in addition to our application terms (<https://www.f6s.com/terms>). The submission of an application is conditional upon you agreeing to the terms of this privacy notice.*
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 notice in addition to our own notice. Please note that we are not responsible for the user account that you have registered with F6S.

Personal Information

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

- 1. We are committed to protecting your privacy and will only use your personal information in accordance with applicable data protection legislation, including the General Data Protection Regulation (as supplemented by the Data Protection Act 2018).*
- 2. To properly complete our application form we require you to provide some basic data about yourself. This is information that we consider necessary or desirable 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.*
- 3. In completing the application form or participating in the application process you may choose to provide further information 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 notice.*
- 4. You are entitled by law to ask for a copy of your personal information at any time. You are entitled to ask us to correct or update your personal information at any time by contacting us at the address above.*

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 information relating to other individuals, such as team members or other people involved in your business or business idea.*
- 2. Where you do provide us with personal information relating to other people, it is essential that you:*
 - a) inform those people that you will be providing their personal information to us;*
 - b) provide them with a copy of this notice so that they are aware of how their personal information may be used and their rights in respect of it; and*
 - c) obtain their written consent (for example by way of email) to you providing the information to us.*
- 3. By submitting information relating to other people, 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.*

Uses made of the information

1. We (and our representatives) may use your personal information 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 (whether via our Website enquiry form or otherwise);
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;
 - c) ensuring that our Website is presented in the most effective manner for you and your computer and tracking your use of the Website through use of cookies and log files to provide a positive user experience and improve and increase usage of our Website; and
 - d) notifying you about a change to our Website or the application process to ensure the effective administration of the application process.
5. We may also contact you regarding investment or commercial opportunities that we consider may be of interest to you. The Program Manager works 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. We do this because it is in our (or the relevant company's or investor's) legitimate interests to pursue promising business opportunities.
 - a) If that company or investor is interested in learning more about you then the Program Manager 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 both parties social media channels, internal communication, etc. If you take part in any relevant events and would prefer not

- e) to be recorded please let us know and we'll ensure you are not included in any content.*
- f) 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.*
- g) Please note however that the withdrawal of your consent will not affect any use of the data made before you withdraw your consent.*

Disclosure of your information

- 1. We (and our representatives) may disclose your personal information 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 use of the Website or 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 Manager and the Promoter may also share your personal information between them and with other companies in the Promoter's group for the purposes of assessing and processing your application and arranging your participation in pitch day.*

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.

Retention, UPDATING AND REMOVAL OF YOUR PERSONAL INFORMATION

1. *Where you provide us with personal information during the course of your usage of the Website, in the application form or during the application process we may retain this information for future use, including:
 - a) *to speed up your future use of the Website and application form;*
 - b) *for record keeping and compliance purposes;*
 - c) *for informing you about upcoming programs;*
 - d) *for exercising our rights set out in the application terms; and/or*
 - e) *to contact you about investment and commercial opportunities that may arise in future.**
2. *The duration for which we retain your personal information will differ depending on the type of information and the reason why it was submitted. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.*
3. *You are responsible for ensuring that the personal information that we hold about you is accurate and up-to-date, and you should check it on a regular basis. Until the closing date you will be able to update information via the application form on the F6S website, so where this personal information changes you can update it yourself. Following closure of the application process, or if you are otherwise unable to do this, you can contact us and, where appropriate, we will update the relevant personal information for you.*
4. *If you want to withdraw your application at any time, please contact us. Your withdrawal will result in the deletion of some of the personal information that we hold about you, but we may still retain some personal information, for example for record keeping purposes. Please note that we do not have the ability to close your F6S account or to delete all of the information that F6S may hold about you. You should contact F6S with any queries in this regard.*
5. *You may in certain circumstances be entitled to request the erasure of personal information that we hold on you. To make a request of this nature, please contact us, providing full details of the personal information you want to be erased and the reason(s) for your request. We will consider all requests upon receipt and confirm to you whether we are able to agree to your request.*
6. *Please be aware that the erasure of personal information that we hold about you may affect our ability to provide the Website and/or process your application and in some cases our acceptance of an erasure request may require us to cease considering your application.*

Cookies

1. *Certain parts of the Website use "cookies" to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store in your device's memory when you visit such websites. Cookies can contain information such as the pages you have visited. The only personal information a cookie contains is information that you have personally supplied.*
2. *We may use cookies on the Website to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the Website you are visiting and to recognise you when you return to the Website. Reading cookies does not give us access to other data in your device's memory and our Website will not read cookies created by other websites that you have visited.*
3. *You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you access the Website.*
4. *Please note providers of third-party content may also use cookies over which we have no control. We have no control over cookies placed on your device by F6S.*

LOG FILES

1. *In common with most websites, our Website logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.*
2. *We may use this information to analyse trends, administer the Website, track your movement around the Website and gather broad demographic information.*
3. *We have no control over log files created by F6S.*

RESPONSIBILITY FOR F6S WEBSITE AND OTHER THIRD-PARTY WEBSITES

1. *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.*
2. *Our Website may, from time to time, contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy notices and that we do not accept any responsibility or liability for these notices. Please check these notices before you submit any personal data to these websites.*

ISSUES AND COMPLAINTS

- 1. In the unlikely event that you have any concerns about how your personal information is being used, please contact us. This includes situations where you want to request the rectification or erasure of your personal information, restrictions to be placed around how we use your personal information, or to object to a particular use.*
- 2. If you make a complaint about our handling of your personal information, it will be dealt with in accordance with our complaints handling procedure.*
- 3. In the first instance your complaint will be reviewed by an employee of the Program Manager or Promoter (depending on which of us you make your complaint to) within 28 days.*
- 4. If you are dissatisfied with the response to our initial review you may request that your complaint be escalated, in which case it will be passed to a senior person within the relevant business who will review your complaint and the initial response and provide a further response within 28 days of your request to escalate the matter.*
- 5. We will endeavor to provide a full response within the relevant review period. However, in some cases further investigation may be necessary (for example, you may submit a complaint to the Program Manager, but it may have to discuss certain aspects of your complaint with the Promoter or vice versa).*
- 6. If we cannot provide a final response within the relevant review period then we will provide an initial response acknowledging your complaint, explaining the reason for the delay and giving an estimate as to when a full response can be provided, and will aim to provide that full response as soon as we reasonably can following the expiry of the relevant review period.*
- 7. If we are unable to resolve your complaint after you have escalated it to a senior person you may make a complaint to the Information Commissioner's Office. Please see <https://ico.org.uk/for-the-public/raising-concerns/> for more information.*

Changes to the privacy notice

- 1. We reserve the right to alter this privacy notice at any time. Such alterations will be posted on the Website by us (if you have submitted an application we will also send you a copy of the updated notice using the details you have provided to us).*
- 2. It is important that you read any alterations as and when they are posted on the Website by us and should you object to any alteration, please contact us.*

Contacting us

- 1. If you have a general query about this notice or the handling of your personal information, or if you have an issue regarding the use or retention of your personal information by the Program Manager or the Promoter please contact the Program Manager's Data Protection Officer at L Marks, Headland House, 72 Acton Street, London, WC1X 9NB or by email at alex@lmarks.com, or the Promoter at starter.acceleration@edp.com.*

FURTHER information

1. *We hope that the contents of this privacy notice address any queries that you may have about the personal information we may hold about you and how we may use it. However, if you do have any further queries, comments or requests, please contact us.*
2. *Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.*