

# Privacy Policy

## 1. Introduction

Welcome to Xmentor.pro, an online platform designed for connecting startups with mentors. Xmentor.pro is owned and operated by Dzmitry Kalinin Agency и FUNDACJA ROZWOJU INNOWACYJNEJ PRZEDSIĘBIORCZOŚCI WESTART (“Service”, “we” or “us”). We provide this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Service.

We are committed to protecting your privacy and ensuring the security of your personal data.

## 2. The Collection of Information

### *Information you provide to us (Profile Information)*

When mentors register and create their profiles, we collect the following personal information: first and last name, contact information, LinkedIn profile URL, citizenship and nationality, location, photo, professional and expert experience, including key positions, projects, achievements and results.

When startups register and provide their details, we collect the following information: personal details, contact information, role in the startup, startup details, business information, founders (name, surname, role in the project), citizenship and nationality data, consideration of the Startup as Belarusian or having Belarusian roots (including supporting details).

We collect and use citizenship and nationality data for verification purposes in support of grant programs offered by various organizations (for e.x. EBRD) and comply with legal and regulatory requirements. These programs are specifically targeted at users from certain countries and regions. By collecting this data, we ensure that only eligible users from designated areas can access the grants and benefits provided by these organizations.

Any information you choose to provide as part of your Profile Information will be publicly visible to all platform’s users and consequently should reflect how much you want other users to know about you. We recommend that you protect your anonymity and sensitive information. We encourage users to exercise caution regarding the information disclosed in their profiles on our Service. You can review and edit your profile information at any time to ensure it reflects only the details you are comfortable sharing.

### *Payment Information*

We use Stripe for payment processing. When you make payments through our platform, Stripe will collect and process your payment information. We do not store any payment information on our servers. For more details, please, read Stripe Privacy Policy via link <https://stripe.com/en-lv/privacy>

### *Communication*

Mentor sessions are conducted via service Zoom. By using our Service, you agree to Zoom's privacy policy and terms of service. For more details, please, read Zoom Privacy Policy via link <https://explore.zoom.us/en/trust/privacy/>

### *Non-Identifying Information*

When you visit and navigate through our Service, we and third parties may automatically collect information about your visits, equipment, browsing actions, patterns, and activities. This information may include, but is not limited to:

Details of Your Visits: information about your visits to our Service, including the resources you access, location data, logs, pages viewed, and the time, date, and duration of your visit.

Device and Connection Information: information about your computer or device and internet connection, such as your IP address, general geographic location, device type and capabilities, operating system or platform, browser type, and Internet Service Provider.

Automatically-collected information is processed to create aggregated statistical data. We may share such aggregated data with third parties. Information that constitutes personal data, or non-personal data associated with personal data collected in other ways or from third parties, is treated as personal data and used and shared as disclosed in this Privacy Policy.

We and third parties may place “cookies” and similar technologies on our platform to collect certain information. A “cookie” is a small text file stored on your device, if your web browser or device settings permit. Cookies allow us and our service providers to measure activity, track conversions and provide analytics. Some cookies are deleted when you close your browser, while others remain even after you close your browsing session.

We engage service providers who may use unique identifiers, cookies, pixels, beacons, and other technologies to provide analytics about how you interact with us and use the platform. We do not control the use of these technologies by third parties or the resulting information, and we are not responsible for the policies of those companies. For more detailed information read our Cookie Policy.

### **3. How We process Your Information**

#### **Legal Bases for Processing**

We process personal data for, or based on, one or more of the following legal bases:

- Performance of a Contract. We use personal data to enter into and to perform under an agreement between us, such as when you create an account and make an order.
- Legitimate Interests. We use personal data for our legitimate interests, including contact information, buying history and inquiry history, and website usage data.
- Compliance with Legal Obligations and Protection of Individuals. We may use personal data to comply with the law and our legal obligations, as well as to protect you and other individuals from certain harms.
- Your Consent. We process certain personal data because you have given us your consent to process it in that manner.

We use the information we collect for the following purposes:

- To facilitate connections between mentors and startups;
- To verify the identities of mentors and startups;
- To process payments;
- To communicate with you about your account and our services and fulfill your requests. For example, we may use your information to respond to your customer service requests.
- To comply with legal and regulatory requirements;
- To enhance the functionality of our platform and to better tailor our content and design to meet the needs of our visitors.
- For any other purpose that is disclosed to you at the point of collection of the personal data;
- For any purpose for which you provide your prior consent; and

- In other ways naturally associated with the circumstances in which you provided the personal data, and for any other lawful purpose.

#### **4. Information Sharing and Disclosure**

We may share your personal information with third parties in the following circumstances:

- With service providers who perform services on our behalf;
- As required by law or to comply with legal processes;
- To protect our rights, property, and safety, and that of our users and others.

We may share aggregated and anonymized information with third parties for verification and grant purposes within the framework of programs supported by various international organizations and structures (for e.x. the European Bank for Reconstruction and Development (EBRD)). This information may also be used in analytical reports, research purposes.

We may engage the following third-party service providers in order to provide us with necessary infrastructure for delivery and improvement of our services:

**Amazon Web Services**, Inc. and affiliated companies, U.S.A. and EU, as cloud storage provider. For more information, please read their Privacy Policy [here](#).

**Google Analytics** (Google LLC), U.S.A., as analytics service provider. For more information, please read their Privacy Policy here <https://policies.google.com/privacy>

**Meta Platforms Ireland Ltd.**, Ireland, ("Meta") as advertisement service. We may use the "visitor action pixels" to track users after they have been redirected to our website by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, i.e. we do not see the personal data of individual users. However, this data is stored and processed by Meta, which is why we are informing you. You can object to the collection of your data by Meta pixel, or to the use of your data for the purpose of displaying Facebook ads in your account-settings. You can find Meta's privacy policy here: [https://de-de.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://de-de.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0).

**LinkedIn Ireland Unlimited Company**, Ireland, as advertisement service to track conversions, retarget website visitors, and unlock additional insights about members interacting with our LinkedIn adverts ( for e.x. the LinkedIn Insight Tag enables the collection of metadata such as IP address information, timestamp, and events such as page views). All data is encrypted. The LinkedIn browser cookie is stored in a visitor's browser until they delete the cookie or the cookie expires. You can opt out of cookies from LinkedIn on your LinkedIn settings page. You can find LinkedIn's privacy policy here: <https://www.linkedin.com/legal/privacy-policy>

#### **5. Data Storage and Security**

Your data is stored on servers located on Amazon Web Services (AWS) in the European Union. AWS is compliant with GDPR and provides Data Processing Agreements (DPA) and the Standard Contractual Clauses (SCCs) approved by the European Commission, govern the processing of personal data by AWS on our behalf, ensuring legal compliance. Given our company's base in the EU, we take the following measures to ensure compliance with GDPR and other relevant data protection laws.

All personal data is encrypted both in transit and at rest. AWS provides robust encryption methods to ensure that data is protected. We implement strict access controls to limit access to personal data to authorized personnel only.

We conduct regular security audits and assessments to ensure our data protection measures are effective and comply with GDPR requirements.

## **6. International Data Transfers**

While our primary data storage is within the EU, in the event that data needs to be transferred outside the EU, we ensure such transfers comply with GDPR requirements, this includes using approved transfer mechanisms such as Standard Contractual Clauses (SCCs). Additionally, we assess the legal framework of the destination country and apply safeguards measures such as encryption or pseudonymization to ensure data protection. Data subjects will be informed about these transfers, and their rights will be protected in accordance with Articles 13 and 14 of the GDPR. Where applicable, transfers may also rely on adequacy decisions or Binding Corporate Rules (BCRs) to guarantee an equivalent level of data protection.

## **7. Your Data Protection Rights**

The European Union's General Data Protection Regulation and other countries' privacy laws provide certain rights for data subjects.

You may contact us [gdpr@xmentor.pro](mailto:gdpr@xmentor.pro) to exercise any of the rights you are granted under applicable data protection laws.

If you are a resident of the European Union, United Kingdom, or EEA, you have;

### **(A) Right to access**

You may ask us whether we collect or use any of your personal data and, if so, to receive access to that data in the form of a copy.

Reasonable access to your personal data will be provided at no cost. If access cannot be provided within a reasonable time frame (one month), we will provide you with a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **(B) Right to rectification**

You have the right to have your data rectified if it is inaccurate or incomplete. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

### **(C) Right to erasure**

You have the right to have your personal data erased. This means that we will delete your data. Erasure of your personal data only takes place in certain cases, as prescribed by applicable laws and listed in Article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data is no longer necessary for the purposes for which it was originally processed and situations where your data was processed unlawfully. Due to the way in which we maintain certain services, it may take some time before backup copies are erased.

### **(D) Right to restriction of processing**

You have the right to obtain a restriction on the processing of your personal data. This means that we will suspend the processing of your data for a certain period. Circumstances which may give rise to this right include situations where the accuracy of your personal data is contested, and we need some time to verify its (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

### **(E) Right to data portability**

Your right to data portability entails that you may ask us to provide you with your personal data in a structured, commonly used and machine-readable format, and have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible, we will transmit your personal data directly to the other controller.

### **(F) Right to object**

You have the right to object to the processing of your personal data. This means you may ask us to no longer process your personal data. This only applies if the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing. You can object to direct marketing at any time and at no cost to you if your personal data is processed for this purposes, which includes profiling to the extent that it is related to direct marketing. If you exercise this right, we will no longer process your personal data for such purposes.

You have the right to complain to a **data protection authority**. If you are located in the European Union, you can have recourse to the European Data Protection Supervisor or the national data protection authority of the state of your residence.

You may withdraw your consent at any time by following the specific instructions concerning the processing for which you provided your consent. For example, you can withdraw consent by clicking the unsubscribe link in the email. You may also contact [gdpr@xmentor.pro](mailto:gdpr@xmentor.pro).

### **For US Citizens**

- **Right to Know:** You have the right to know what personal data we collect about you, how it is used, and with whom it is shared. This includes the right to request specific pieces of personal data collected about you in the past 12 months.
- **Right to Delete:** You have the right to request the deletion of your personal data that we have collected and retained, subject to certain exceptions.
- **Right to Opt-Out:** You have the right to opt-out of the sale of your personal data. Although we do not sell personal data, this right is provided for transparency.
- **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment for exercising your privacy rights.

## **8. Children's Privacy**

Our services are not intended for use by children under the age of 16, and we do not knowingly collect personal data from children. If we become aware that we have inadvertently collected personal information from a child under the age of 16, we will take steps to delete such information as soon as possible. If you are a parent or guardian and believe that your child has provided us with personal information, please contact us at [gdpr@xmentor.pro](mailto:gdpr@xmentor.pro) so that we can take appropriate action.

## **9. Data Retention**

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, regulatory, or contractual requirements. When we no longer need to use your personal data, and there is no need for us to keep it to comply with our legal or regulatory obligations, we will remove it from our systems or anonymize it so that you can no longer be identified from it. Specific retention periods depend on the type of data and the purposes for which it is processed. If you have any questions about our data retention practices, please contact us at [gdpr@xmentor.pro](mailto:gdpr@xmentor.pro).

## **10. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. Any changes will be posted on this page with an updated revision date. We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information.

## **11. Contact Us**

If you have any questions or concerns about this Privacy Policy, please contact us at [gdpr@xmentor.pro](mailto:gdpr@xmentor.pro).

By using our Service, you acknowledge that you have read and understood this Privacy Policy and agree to the collection, use, and disclosure of your personal information as described herein.

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