

PRIVACY POLICY

Effective Date: 13 January 2023

EMCR is committed to protect and secure personal information of our Users. This Privacy Policy sets forth our policy in relation to personal and other information collected from Users of the website emcr.io (the “Website”). This Privacy Policy is the integral part of the Terms and Conditions of EMCR (“Terms”) and governs collection, processing and use of your personal information.

All capitalized terms used in the Terms shall apply to this Privacy Policy with the same meanings as in the Terms.

By browsing, accessing and using our Website and Services, you agree to proceed on the basis of this Privacy Policy and you agree with the conditions of processing the personal information contained in this document.

DEFINITION OF PERSONAL INFORMATION

Throughout this Privacy Policy, we refer to your “personal information” which is any information relating to you that can identify you, directly or indirectly, in particular by reference to an identifier such as a name, email address, an identification number, location data, or an online identifier.

COLLECTION OF YOUR PERSONAL INFORMATION

EMCR collects personal information when you:

- visit our Website;
- register an account with our Website;
- fill in registration and other forms on or through the Website;
- contact us with any enquiries;
- request services of EMCR;
- submit any content, including User Content, with the use of Services;
- communicate with other Users;
- provide any information to EMCR;
- submit comments or feedback.

EMCR does not collect personal information beyond the limited data we need for you to perform our Services. We may receive the following personal information:

- information provided by the user during account registration, including, without limitation, personal details, user name, name and surname, email, mobile number, date of birth, country of residence, place of work/study;
- information about your professional background, including, without limitation, information contained in your CV if you wish to download in on the Website;
- your gender;
- any other personal information which you directly provide to EMCR; and
- any other personal information requested or required by the Website.

Our Website can be visited anonymously. The Website processes anonymous metadata through cookies such as the URL of the requested file, the amount of data transferred, the date and time of the request from the User, Internet browser information, operating system type, the IP address of the used device, the Internet service provider, reference links such as user clicks on certain links. This metadata cannot be used by the Website to obtain personally identifiable information. This information is only used for general purposes, such as technical improvements, statistical and marketing analysis.

We will only collect and process personal information about you where we have lawful bases. Lawful bases include:

- consent (where you have given consent);
- contract;
- legitimate interests.

EMCR does not knowingly provide Services and collect personal information from anyone under 14 years of age. Our Services are available only to the users over 16 years old. If you are at least 14 years old, we may provide you with the Services with your parent or guardian consent. If we learn that we have collected the personal information of a child under 14, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

Where we rely on your consent to process personal information, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal information, please contact our Data Protection Officer at dpo@emcr.io.

SHARING YOUR PERSONAL INFORMATION

We may share your information with:

- service providers we work with to deliver services (for example, vendors who help to perform some services on our behalf);
- legal and regulatory authorities, as required by applicable laws and regulations;
- our employees.

The user understands that the personal information is available and accessible by our employees who we believe reasonably need to come into contact with that information to provide services to you or in order to do their jobs.

We may share your personal information to determine, prevent and investigate any violation committed on the Website.

The details of main service providers with whom EMCR may share personal data of users for the purpose of provision of Services:

Service Provider	Purpose	About Service Provider	What information we share
Google Analytics	Web & Mobile Analytics	The platform is owned by Google LLC	Personally non-identifiable information
Yandex.Metrica Service	Web & Mobile Analytics	The platform is owned by YANDEX LLC	Personally non-identifiable information

We will not disclose, sell, trade, or otherwise transfer your personal data to any third parties without your consent or unless otherwise stated in this Privacy Policy.

This Privacy Policy does not apply to the practices of service providers and other third parties that we do not own or control, or individuals that we do not employ or manage.

AUTOMATIC COLLECTION

When you visit our Website and use our Services, we may automatically receive some information that identifies, for each page accessed:

- the type of browser and operating system you have used;

- the IP (Internet Protocol) address of the device which has accessed it (example PC, tablet);
- the date and time of your visit to the Website;
- the pages accessed and documents downloaded;
- your top-level domain name (for example .com, .eu, .uk, etc.);
- the address of your server;
- the previous website visited;
- the average duration of page view;
- the navigation behaviour and preferences of the user.

SENSITIVE INFORMATION

We do not collect or request your sensitive information (including, but not limited to, information about your religious or political beliefs, opinions). Where you have provided it to us voluntarily, you shall be solely responsible for security of any sensitive information, and we do not intend to use this information for any purpose, nor share this information with any third parties. Please do not post or add sensitive and other personal information that you would not want to be publicly available.

USE OF PERSONAL INFORMATION

Personal information will be collected, held, used and disclosed for the following purposes jointly and/or severally:

- for the purposes for which it was collected (as set out in this Privacy Policy);
- to provide you with services requested;
- to identify you and personalize your experience with us;
- to process two-factor authentication;
- to connect Users with each other;
- to verify your professional credentials (only applicable to Experts and Contributors as defined in Terms);
- to process registration and log in to our Website;
- to communicate with you as described in this Privacy Policy;
- to communicate with you if you subscribed to social media channels;
- to provide you with newsletters via mail and e-newsletters;
- to process any requests or complaints;
- to record statistical data for marketing analysis and to conduct market research;
- to the extent permissible or necessary by law, for any other purpose as may be deemed reasonably necessary by EMCR in the circumstances;
- to perform other activities as described in the Privacy Policy.

USER'S ABILITY TO EDIT PERSONAL INFORMATION

You may access your personal information held by us to correct, update and remove inaccurate or incorrect data. You have the following rights:

- delete some or all personal information that we held about you;
- change or correct your personal information that we held about you;

- object to, or limit or restrict, use of your personal information;
- right to access and/or take your personal information: you can ask us for a copy of your personal information in machine readable form.

If you want your personal information to be corrected, updated or removed, please contact us at dpo@emcr.io.

SECURITY OF YOUR PERSONAL INFORMATION

We use certain technologies to ensure the confidentiality of your personal information. EMCR uses several security measures, including, without limitation, data transfer through HTTPS (SSL/TLS), password encryption with MD5 algorithm, and other industry-leading measures to protect your information.

While we strive to use commercially acceptable means to protect your personal information, no method of transmission over the Internet, or method of electronic storage, is completely secure, and we cannot guarantee absolute security of your personal information.

COMMUNICATIONS

Our Website sometimes will be sending you communication via email, examples of such emails may include a welcome email, verification emails, or any other emails that are required to operate your account such as account management email, or system notifications. You can stop some of these emails only if you terminate your account on the Website.

Users can subscribe to project-related notifications, such as, without limitation, an invitation to a project, notifications about any changes in a project, new project notifications, user preferences notifications, notifications about new markets. Users can also subscribe to our newsletters, this communication includes information such as promotion emails, updates and news from us. You may unsubscribe from these notifications any time by visiting an opt-out page.

DATA RETENTION

We retain your personal information for as long as your account is in existence or necessary to fulfil the purposes for which we collect it or as needed to provide you with the services, except if required otherwise by law. However, when you terminate your account, we will still retain your personal information for a period of time. Usually, we will store your personal information for a period of 5 (five) years after you cease being a user of our Services, beginning at the date your account is closed. There are several reasons which we retain your information even longer, these include:

- to comply with legal obligations under EU or local laws (for example, anti-money laundering regulations);
- to establish or defend legal claims which could be made against us.

Retention periods may be changed from time to time based on business or regulatory requirements.

MERGE OF COMPANY

If EMCR merges with, or is acquired by, another company or organisation, or sells all or a portion of its assets, your personal information may be disclosed to our advisers and any prospective purchaser or any prospective purchaser's adviser, and may be among the assets transferred. However, personal information will always remain subject to this Privacy Policy.

CROSS-BORDER DATA TRANSFERS

We process information both inside and outside of the European Union and European Economic Area and rely on legally-provided mechanisms to lawfully transfer information across borders. Countries where we process information may have laws which are different, and potentially not as protective, as the laws of your own country.

CHANGES TO THE PRIVACY POLICY

We may change this Privacy Policy from time to time. As soon as the Privacy Policy is updated, EMCR will post an updated version of the Privacy Policy on the Website. The new Privacy Policy becomes effective from the moment it is posted or updated on our Website. We will send you an email notification to alert you about such changes.

Data Controller Person

To communicate with our Data Protection Officer, please contact us at dpo@emcr.io.