PRIVACY POLICY

Startup People (SUP46 AB)
Effective Date: December 3, 2025

1. Introduction

Welcome to Startup People ("SUP", “SUP46”, "we", "us", or "our"). We are committed to protecting your personal data and respecting your privacy. This Privacy Policy explains how we collect, use, store, and share your personal information when you use our platform at startuppeople.com (the "Service").

Controller Information:

- Company Name: SUP46 AB
- Organization Number: 556936-3426
- Address: Britadalsvägen 9, 167 33 Bromma, Sweden
- Contact Email: membership@sup46.com

This Privacy Policy applies to all users of our Service, including free members, premium members, and visitors. By using our Service, you agree to the collection and use of information in accordance with this policy.

2. Legal Basis for Processing

We process your personal data under the following legal bases as defined by the General Data Protection Regulation (GDPR):

- Contractual Necessity: To perform our contract with you (membership agreement)
- Legitimate Interest: To operate, improve, and secure our Service
- Consent: Where you have explicitly given us permission (e.g., marketing communications, sensitive data)
- Legal Obligation: To comply with Swedish law (e.g., accounting, tax requirements)

3. Personal Data We Collect

3.1 Identity Data

- First name and last name
- Display name
- User ID (UUID)

- Profile picture/avatar URL
- Custom author name (for content creators)

3.2 Contact Information

- Email address (primary account email)
- Phone number
- Physical location (city/country)
- LinkedIn profile URL
- Email addresses for job applications (when you post jobs)
- Email addresses of invitees (when you invite others to your organization)

3.3 Professional Information

- Skills and expertise
- Career goals and objectives
- What you're offering to the community
- What you're looking for from the community
- Company/organization affiliations
- Job postings you create
- Articles you author or contribute to
- Events you create or organize

3.4 Financial Data

- Stripe Customer ID (for payment processing)
- Billing information (processed and stored by Stripe)
- Credit/debit card information (processed and stored by Stripe, not by us)
- Subscription status (Starter, Premium, Partnerships)
- Invoice history

3.5 Technical and Authentication Data

- Operating system information
- Browser type and version
- Authentication provider (Google, GitHub, Email/Password)
- Login timestamps (last sign-in, account creation, email confirmation)
- Session data
- Cookies and tracking identifiers (see Section 5)

3.6 Behavioral and Usage Data

- Profile views (who viewed your profile and whose profiles you viewed)
- Notification interactions (read/unread status)

- Bookmarks and saved content
- Profile view count
- Content you create (articles, jobs, events)
- Search queries on the platform
- Pages visited and features used

3.7 Communications Data

- Messages and communications with SUP staff
- Feedback and survey responses
- Support tickets and inquiries

3.8 Sensitive Data (Processed Only with Consent)

- Dietary restrictions or allergies (for event catering purposes)
- Any other sensitive information you voluntarily provide

4. How We Collect Your Data

We collect personal data through the following methods:

4.1 Direct Collection

- Information you provide when creating an account
- Information you add to your profile
- Content you post (articles, jobs, events)
- Forms you submit
- Communications with us

4.2 Automatic Collection

- Cookies and similar tracking technologies
- Analytics tools (see Section 5)
- Server logs and technical data
- Session replay and monitoring tools

4.3 Third-Party Sources

- Authentication providers (Google, GitHub)
- Payment processor (Stripe)
- Publicly available sources (for content aggregation)

4.4 Automated Content Collection

We use automated systems to collect and aggregate publicly available content:

- Event scraping: We automatically visit public event websites, scrape event information, and normalize it for display in our Service
- Grant aggregation: We collect publicly available grant and funding opportunity information from government portals and other public sources
- AI-assisted processing: We use AI services (see Section 6.5) to analyze, structure, and enrich this publicly available content

5. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance your experience, analyze usage, and improve our Service.

5.1 Types of Cookies We Use

Essential Cookies (Required):

- Authentication and session management (Supabase Auth)
- Security and fraud prevention
- Load balancing and performance

Analytics Cookies:

- Google Analytics 4 (GA4): Tracks pageviews, user behavior, and site performance
- Vercel Analytics: Monitors site performance and user interactions
- Hotjar: Records user sessions, heatmaps, and feedback
- LogRocket: Session replay and error monitoring

Consent Management:

- SecurePrivacy: Manages cookie consent preferences

5.2 Managing Cookies

You can control cookies through:

- Your browser settings (most browsers allow you to refuse cookies)
- Our cookie consent banner (powered by SecurePrivacy)
- Opt-out links provided by third-party analytics providers

Please note that disabling essential cookies may affect the functionality of our Service.

5.3 Third-Party Tracking

The following third-party services may set cookies or use tracking technologies:

- Google Analytics 4
- Vercel Analytics
- LogRocket
- Hotjar
- SecurePrivacy

For more information about how these services use your data, please refer to their respective privacy policies.

6. How We Use Your Personal Data

6.1 To Provide and Maintain Our Service

- Create and manage your account
- Process your membership subscription
- Provide access to platform features (articles, perks, events, grants)
- Enable networking and community features
- Facilitate profile discovery and connections

6.2 To Communicate with You

- Send transactional emails (account confirmations, password resets)
- Deliver platform notifications (new perks, events, articles)
- Respond to your inquiries and support requests
- Send membership invoices and payment confirmations

6.3 For Marketing (with Your Consent)

- Send newsletters and updates about our services
- Notify you about new features and offerings
- Share relevant content and resources

You can opt out of marketing communications at any time by:

- Clicking the "unsubscribe" link in our emails
- Updating your notification preferences at startuppeople.com/email-notifications
- Contacting us at membership@sup46.com

6.4 To Improve and Analyze Our Service

- Understand how users interact with our platform
- Identify bugs, errors, and technical issues

- Conduct research and analysis to improve features
- Monitor and analyze usage trends
- Test new features and functionality

6.5 Use of AI Services

We use third-party AI services to enhance our Service:

OpenAI (GPT-4 and GPT-4o-mini):
We use OpenAI's AI models to analyze publicly available event webpages and convert them into structured data. When you or our system submit an event URL, we send the text content of that public webpage, together with our internally defined category list and country list, to OpenAI in order to:

- Extract event details (name, format, language, location, dates, price indication, and image URL)
- Generate short marketing-style descriptions aimed at startup founders

These AI outputs are used to power features like event discovery, automatic event approval, and pre-filling event information in our database. We do not use AI outputs to make automated decisions about individuals that produce legal or similarly significant effects.

Anthropic Claude (via tweak.ai):
We use tweak.ai, a third-party service, to assist with scraping and analyzing publicly available data from event webpages. When an event is processed, we may send the event URL and derived technical metadata to tweak.ai so it can help us retrieve, clean, and structure the page content before it is stored or further analyzed by our systems. As part of this service, tweak.ai may use large language models provided by Anthropic (Claude) to help us clean, structure, and enrich the retrieved content.

Data Sent to AI Services:

- Publicly available event content (text and images from event pages)
- Derived metadata (category IDs, country IDs, dates, descriptions)

Data NOT Sent to AI Services:

- User account credentials
- Payment details
- Private messages or communications
- Personal user data

Legal Basis:
We process this data via OpenAI, tweak.ai, and Anthropic on the basis of our legitimate

interests in providing, improving, and automating our event discovery, moderation, and grants aggregation features, and in keeping event information accurate and up to date.

6.6 Aggregation of Grants and Funding Opportunities

Our Service aggregates information about grants and other funding opportunities from third-party sources (such as public websites, government portals, and other providers). This may involve automatically visiting those sites, scraping or retrieving publicly available information, and normalizing it into a common format for display and search in our product.

Important Disclaimer:
We are not affiliated with, endorsed by, or responsible for these third-party grant providers. The information we surface (including eligibility criteria, dates, and amounts) may change or be inaccurate. You should always verify details directly with the original source before applying or relying on them.

6.7 To Ensure Security and Prevent Fraud

- Detect and prevent unauthorized access
- Monitor for suspicious activity
- Enforce our Terms of Service and Code of Conduct
- Protect against spam, abuse, and security threats

6.8 To Comply with Legal Obligations

- Respond to legal requests and court orders
- Comply with tax and accounting regulations (7-year retention for financial records)
- Fulfill regulatory requirements

7. How We Share Your Personal Data

7.1 Public Information

The following information is publicly visible to other users of the Service:

- Your name and profile picture
- Your LinkedIn profile URL
- Your location
- Your skills, goals, and what you're offering/looking for
- Articles, jobs, and events you create
- Your company/organization affiliations

You can control the visibility of some information through your profile settings at startuppeople.com/profile.

7.2 Third-Party Service Providers

We share your personal data with trusted third-party service providers who process data on our behalf:

Payment Processing:

- Stripe: Processes all payments, stores billing information, and manages subscriptions

Infrastructure and Hosting:

- Supabase: Hosts our database and authentication system
- Vercel: Hosts our web application

Authentication:

- Google: OAuth authentication provider
- GitHub: OAuth authentication provider

Analytics and Monitoring:

- Google Analytics 4: Website analytics
- Vercel Analytics: Performance monitoring
- LogRocket: Session replay and error tracking
- Hotjar: User behavior analytics and heatmaps
- SecurePrivacy: Cookie consent management

Communications:

- Gmail: Email delivery infrastructure
- Customer.io: Marketing and transactional email automation

AI and Content Processing:

- OpenAI: Event content analysis and description generation
- Anthropic (via tweak.ai): Event webpage scraping and content structuring

All third-party service providers are contractually obligated to:

- Process data only on our instructions
- Implement appropriate security measures
- Not use your data for their own purposes (except as required to provide their services)

7.3 Affiliate and Partner Programs

Some perks and offers on our platform are provided through affiliate partnerships. When you claim a perk, we may share limited information (such as your email address) with the perk provider to facilitate the offer. We may receive a commission from some perk providers when you use their services.

7.4 Legal Requirements

We may disclose your personal data if required to do so by law or in response to:

- Court orders or legal processes
- Requests from law enforcement or government authorities
- Protection of our rights, property, or safety
- Prevention of fraud or illegal activity

7.5 Business Transfers

If SUP is involved in a merger, acquisition, or sale of assets, your personal data may be transferred to the acquiring entity. We will notify you via email and/or a prominent notice on our Service before your data is transferred and becomes subject to a different privacy policy.

7.6 With Your Consent

We may share your personal data for other purposes with your explicit consent.

8. International Data Transfers

Our Service is operated from Sweden, but we use service providers located in various countries, including the United States (OpenAI, Stripe, Google, GitHub, LogRocket, Hotjar, Customer.io).

When we transfer your personal data outside the European Economic Area (EEA), we ensure appropriate safeguards are in place, such as:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Adequacy decisions by the European Commission
- Privacy Shield certification (where applicable)

For more information about the safeguards we use for international data transfers, please contact us at membership@sup46.com.

9. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

9.1 Active Accounts

- Data is retained for the duration of your active membership

9.2 Closed Accounts

- Personal data is deleted within 30 days after account closure
- Exception: Financial and billing data (invoices, payment records) is retained for 7 years to comply with Swedish accounting and tax laws (Bokföringslagen)
- Exception: Anonymized statistical data may be retained indefinitely (e.g., "number of members in 2024" without personal identifiers)

9.3 Inactive Accounts

- If your account has been inactive for an extended period, we may send you a reminder email
- If you do not respond within 30 days, we may delete your account and associated data

9.4 Marketing Data

- If you opt out of marketing communications, we will retain your email address on a suppression list to ensure we do not contact you again

9.5 Legal Holds

- We may retain data longer if required by law, legal proceedings, or to protect our legal rights

10. Your Rights Under GDPR

As a data subject under the GDPR, you have the following rights:

10.1 Right to Access

You have the right to request a copy of all personal data we hold about you. You can request this by contacting membership@sup46.com.

10.2 Right to Rectification

You have the right to correct inaccurate or incomplete personal data. You can update most information directly through your profile settings at startuppeople.com/profile.

10.3 Right to Erasure ("Right to be Forgotten")

You have the right to request deletion of your personal data in certain circumstances, such as:

- The data is no longer necessary for the purposes for which it was collected
- You withdraw your consent (where consent was the legal basis)
- You object to processing based on legitimate interests
- The data was unlawfully processed

How to delete your account:

- Go to startuppeople.com/profile
- Scroll to the bottom of the page
- Click the "Delete account" link
- Follow the prompts to confirm deletion

Alternatively, you can contact us at membership@sup46.com to request account deletion.

Please note that we may retain certain data to comply with legal obligations (e.g., financial records for 7 years as required by Swedish accounting law).

10.4 Right to Restriction of Processing

You have the right to request that we limit how we use your personal data in certain circumstances, such as:

- You contest the accuracy of the data
- The processing is unlawful, but you do not want the data deleted
- We no longer need the data, but you need it for legal claims

10.5 Right to Data Portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format (e.g., CSV, JSON) and to transmit it to another service provider.

10.6 Right to Object

You have the right to object to processing based on legitimate interests, including:

- Direct marketing (you can opt out at any time)
- Profiling for marketing purposes

- Processing for research or statistical purposes

10.7 Right to Withdraw Consent

Where we process your data based on consent, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing before the withdrawal.

10.8 Right to Lodge a Complaint

If you believe we have violated your privacy rights, you have the right to lodge a complaint with the Swedish supervisory authority:

Integritetsskyddsmyndigheten (IMY)
Box 8114
104 20 Stockholm, Sweden
Website: https://www.imy.se
Email: imy@imy.se

10.9 How to Exercise Your Rights

To exercise any of these rights, please contact us at:

- Email: membership@sup46.com
- Subject Line: "GDPR Data Subject Request"
- Include: Your full name, email address, and a description of your request

We will respond to your request within 30 days (or as required by law).

11. Security Measures

We take the security of your personal data seriously and implement appropriate technical and organizational measures to protect it against unauthorized access, loss, destruction, or alteration.

11.1 Technical Measures

- Encryption: Data in transit is encrypted using TLS/SSL
- Password Security: Passwords are hashed and encrypted (never stored in plain text)
- Access Controls: Role-based access controls limit who can access personal data
- Secure Infrastructure: Our database and authentication system are hosted on Supabase, which complies with industry security standards
- Regular Backups: Data is regularly backed up to prevent loss

11.2 Organizational Measures

- Employee Training: Staff are trained on data protection and privacy best practices
- Data Minimization: We collect only the data necessary for our purposes
- Vendor Management: Third-party service providers are carefully vetted and contractually obligated to protect your data
- Incident Response: We have procedures in place to detect, respond to, and report data breaches

11.3 Data Breach Notification

In the event of a data breach that is likely to result in a high risk to your rights and freedoms, we will:

- Notify the Swedish supervisory authority (IMY) within 72 hours of becoming aware of the breach
- Notify affected users without undue delay via email
- Provide information about the nature of the breach, the likely consequences, and the measures we are taking to address it

12. Children's Privacy

Our Service is not intended for individuals under the age of 18 years. We do not knowingly collect personal data from children under 18.

If you are under 18, you may not:

- Create an account
- Use our Service
- Provide any personal information to us

If we become aware that we have collected personal data from a child under 18 without parental consent, we will take steps to delete that information as soon as possible.

If you believe we have collected data from a child under 18, please contact us immediately at membership@sup46.com.

13. Third-Party Links and Services

Our Service may contain links to third-party websites, services, and content (e.g., perk providers, event organizers, grant sources). This Privacy Policy does not apply to those third-party services.

We are not responsible for the privacy practices of third parties. We encourage you to read the privacy policies of any third-party services you use.

Specific Disclaimers:

- Perks & Offers: We are not responsible for the terms, quality, or privacy practices of perk providers
- Events: We are not responsible for events organized by third parties
- Grants: We are not responsible for the accuracy or availability of grant information from third-party sources

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or Service features.

When we make material changes, we will:

- Update the "Effective Date" at the top of this policy
- Notify you via email (to the address associated with your account)
- Display a prominent notice on our Service

Your continued use of the Service after the effective date of the updated Privacy Policy constitutes your acceptance of the changes.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your data.

15. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

SUP46 AB
Britadalsvägen 9
167 33 Bromma, Sweden

Email: membership@sup46.com
Subject Line: "Privacy Inquiry"

We will respond to your inquiry within a reasonable timeframe, typically within 5 business days.