
Information on the processing of personal data by USI Startup Centre

1. Introduction

The purpose of this information notice is to provide guidance on the processing of personal data processed by USI Startup Centre in its activities of strategic support to researchers, professors, students and entrepreneurs in the development of their innovative early-stage entrepreneurial projects and in activities aimed at improving and growing the innovative entrepreneurial community.

2. Data Controller

This information is provided by USI - Università della Svizzera italiana, with registered office in Via Buffi 13, 6900 Lugano, Switzerland as Data Controller.

The Data Controller may be contacted by writing to the address of the registered office, by calling +41 58 666 40 00 or by sending an email to: info@usi.ch.

The Data Protection team may be contacted directly at: privacy@usi.ch.

3. Purpose of the data processing, justification, categories of data and retention period

USI, and in particular USI Startup Centre, processes the personal data of the data subjects on the basis of the requirements connected with the performance of the tasks it is entrusted with pursuant to the Law on Universities, the Statute of USI (art. 56) and the Rectorate's Dispositions on Incubator's services; the table below summarizes the purposes, the justifications, the categories of personal data and the relative retention period of the personal data processed for the purposes of managing the relationship with USI Startup Centre.

The provision of data is necessary for the provision of the services offered by USI-StartUp Centre. Any refusal will result in the impossibility of the provision of such services.

Purpose of the data processing	Justification	Categories of data	Retention period
Managing contact requests (via online forms) to discuss innovative entrepreneurial projects.	Fulfilment of legal duties (Art. 56 USI Statutes; Dispositions on Incubator's Services)	First name and surname, gender, contact details (no. of telephone, address, e-mail), categories of affiliation within a university institution in Switzerland or abroad, any notes, project name.	1 year after the contact request.
Collection (via online form) and evaluation of applications for the incubation program; conclusion of a possible incubation contract.	Fulfilment of legal duties (Art. 56 USI Statutes; Dispositions on Incubator's Services)	First name and surname, gender, nationality, contact details (no. of telephone, address, e-mail), category of affiliation within a university institution, CV, motivation letter; project related information.	5 years after the submission of the application for the incubation program
Support during the pre-incubation and incubation	Fulfilment of legal duties (Art. 56 USI Statutes;	Incubation contract, any personal data and information collected during	10 years from the end of the pre-incubation or incubation contract

period; provision of coaching activities	Dispositions on Incubator's Services) / Overriding interest (contractual fulfilment)	the accompaniment of the project	
Advice to start-ups via market analysis, via PitchBook platform consultation	Fulfilment of legal duties (Art. 56 USI Statutes; Dispositions on Incubator's Services) / Overriding interest (contractual fulfilment)	Market data relating to natural or legal persons made available by PitchBook Data Inc. (autonomous data controller) on a licence basis. Please refer to the PitchBook Privacy Policy	USI in principle does not store data consulted on the platform
Event organisation and registration management	See the respective data processing activity mentioned in USI's privacy policy on the processing of personal data in the context of USI event registrations (at this link).		
Managing and maintaining contact with invited speakers at USI Startup Centre events	Implied consent	Name, surname, e-mail of the speaker	Until withdrawal of consent
Sending communications on USI Startup Centre events and activities to external users	See the respective data processing activity mentioned in USI's privacy policy concerning USI Newsletter (at this link).		
Sending communications and newsletters to internal users (i.e. USI users and USI Startup Centre users)			
Collection and verification of personal data for start-up domiciliation at USI	Fulfilment of legal duties (Art. 56 USI Statutes; Dispositions on Incubator's Services) / Overriding interest (pre-contractual verifications)	Personal details and copies of identity documents of natural persons related to the start-ups admitted or to be admitted to the incubation program. Residence permit in Switzerland, if the natural persons are from abroad. Self-certification of pending charges.	6 months from the decision to authorise or refuse domiciliation
Management of external advisors for the sole purpose of connecting aspiring entrepreneurs with mentors or partners for more specific advice. The Advisor acts towards the data subject as an autonomous data controller.	Fulfilment of legal duties (Art. 56 USI Statutes; Dispositions on Incubator's Services) / Overriding interest (contractual fulfilment in the interest of USI Startup Centre's users)	Advisor data (name, surname, e-mail, reference company, signature). Startup data (name, surname and e-mail of the startup founders)	Until the end of the framework contractual relationship. With regard to the relationship between the Advisor and the USI Startup Centre user, USI does not in principle process information except for the above-mentioned processing purposes
Coordination and management of the	Overriding interest	Personal data of participants (name and surname, age,	See the privacy policy of Innosuisse (as data

modules of the Innosuisse Entrepreneurship Training program, <u>as data processor on behalf of Innosuisse.</u>	(contractual fulfilment with Innosuisse in the interest of USI Startup Centre's users and third parties	gender, nationality, address, e-mail, telephone number, CV) Personal data of speakers (speaker's name, surname and e-mail)	controller) concerning the processing of personal data carried out in the course of its activities (at this link); in any case, on USI Startup Centre's side, shall not be stored beyond the duration of the agreement between USI and Innosuisse
Collection and analysis of data from people interested in activities offered by the USI Start Up Centre.	See USI's cookie policy (at this link).		

The Service, on the basis of a private interest to be considered overriding, may request further information and data as a rule directly from the interested parties (i.e. the natural persons linked to the start-ups admitted or to be admitted to the incubation program) in the event of a need for clarification, in particular when situations emerge that could entail increased risks (e.g. financial or reputational) for the Institution. In particular, but not exhaustively, the following may be requested: self-certifications (in relation to proceedings and/or pending charges), extracts from authorities. Within the limits and under the conditions permitted by law, the Service may also request information from third parties in special cases, in which case it undertakes to comply with the provisions of the Federal Act on Data Protection in particular.

Lastly, the Service may process the personal data referred to in the above-mentioned processing operations in anonymised form, to the extent necessary and to meet the needs of actively informing the public and improving the services offered, storing in this regard the data in an anonymised and aggregated form for a longer period than the aforementioned retention periods.

4. Data Recipients

In order to guarantee the above-mentioned services and in compliance with the relevant purposes, the above-mentioned personal data will be processed by the University's administrative and academic staff (e.g. collaborators, lecturers and professors) only to the extent necessary for the performance of their respective tasks.

The University also collaborates with external suppliers to offer specific services in support of its institutional activities, such as external advisors. The USI Startup Centre puts the incubator's start-ups in contact with advisors if they need specialised advice. Project information is then shared directly with the start-ups if the latter accept the advisory service. The advisor is required to sign a confidentiality statement and will act as an independent owner.

In the event of litigation or proceedings, data may also possibly be shared with the appropriate and competent judicial authorities under the terms of the law.

Data relating to participants in the Innosuisse Entrepreneurship Training programme will be shared with Innosuisse as the independent data controller.

With regard to the transfer of data abroad, the principle is that data will not be transferred outside Switzerland. Should a transfer of data abroad for the purpose of processing the personal data described above be deemed necessary, USI guarantees that the transfer of

data will take place in compliance with the obligations laid down by the legislation in force and by the contracts entered into by the University to guarantee the protection of personal data.

5. Data Subjects' rights

The data subject holds, in particular, the following rights:

- a) to obtain the rectification of inaccurate or outdated personal data, to revoke previously given consent to the processing of data, to prevent the disclosure to third parties of personal data worthy of special protection.
- b) to obtain information in writing and in principle free of charge concerning the personal data being processed.
- c) to obtain delivery of personal data or demand that they be transmitted to third parties.
- d) to request that their personal data be stopped from being processed, disclosed to third parties, rectified or destroyed.
- e) to contact the cantonal representative if disagreeing with USI's data handling (<https://www4.ti.ch/can/sgcds/pd/generalita.>) It should be noted that USI reserves the right to assert restrictions provided by law, e.g. when it is obliged to store or process certain data, when required by overriding public or private interests.

To exercise the above rights, you may contact the Data protection consultant at the address privacy@usi.ch.

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