

## PRIVACY POLICY OF THE STARTUP LADDER PLATFORM

Last Updated: December 17, 2025

### 1. Introduction and Acceptance

This Privacy Policy describes how Startup Ladder, located at Porto Alegre, Rio Grande do Sul, Brazil collects, uses, stores, and protects the data of its Users. By accessing the Platform, the User fully agrees with the terms of this Policy, which is drafted in compliance with the General Data Protection Regulation (LGPD – Brazilian Law No. 13,709/2018).

### 2. Data Collected and Purpose

We collect data from our Users with the primary purpose of providing diagnostic services, business intelligence, and portfolio management support. Data collection is divided into three essential categories:

Data Category	What We Collect	Purpose of Collection
A. Identification Data (Account)	Full name, email	Creation and management of the User Account, communication regarding the service, and technical support.
B. Startup Characterization Data	Incubator name, Industry Sector, Country, City, Team Size, Business model, Foundation date.	Essential for contextualizing the Diagnostic analysis and providing comparative benchmarks.
C. Diagnostic Data (Content)	Responses to the 32 questions and scores from the scales (Importance and Development) of the business proposal.	Primary Purpose: Generation of the Individualized Diagnostic Report and composition of the Anonymous Benchmarking Dataset.
D. Navigation Data	IP Address, cookies, access logs, and Platform usage history.	Security, fraud prevention, and continuous improvement of the User experience.

### 3. Legal Basis for Processing and Data Use

**3.1. Benchmarking:** The User acknowledges that the Diagnostic Data (Category C) will be used in an ANONYMIZED and AGGREGATED form to create comparative Benchmarks (sector, country, and incubator averages). This anonymization process ensures that the individual User's data cannot be traced and is essential for the provision of the contracted service.

**3.2. Personal Data:** The Identification Data (Category A) is not used in the composition of Benchmarks; it is used exclusively for Account management and communication.

#### **4. Sharing and Security of Data**

**4.1. Restricted Sharing:** Startup Ladder does not sell, rent, or transfer Personal Data to third parties for marketing purposes. Data sharing occurs only with:

- Technical Partners: Providers of hosting services (cloud servers) and payment gateways, under strict confidentiality clauses.
- Legal Obligations: In compliance with court orders or regulatory requirements.
- Research: Aggregated results and statistics, ensuring complete confidentiality regarding the identification and characterization of individual startups, may occasionally be used for research purposes and academic publications.

**4.2. Security:** We adopt technical and organizational security measures (encryption, access control, etc.) to protect data against unauthorized access, loss, or alteration.

#### **5. Data Subject Rights (LGPD)**

The User (Data Subject) may exercise the rights provided for in the LGPD at any time by making a formal request through our contact channel. These rights include:

- The right to access and confirm data processing.
- The right to correct incomplete or outdated data.
- The right to revoke consent.
- The right to deletion (anonymization) of unnecessary data or data processed based on consent.

#### **6. Final Provisions and Contact**

For any questions or to exercise their rights, the User may contact us via email: [contact@startupladder.io](mailto:contact@startupladder.io)