

# Privacy Policy

Last updated: 16 October 2026

## 1. Who we are

This Privacy Policy explains how Spark Hub LLP (registration number P00242018, Republic of Maldives), which operates the Startup Maldives Platform ("Startup Maldives", "we"), collects, uses, shares and protects personal data when you use the Platform, attend our events or contact us. Spark Hub LLP is the controller of your personal data. Contact for privacy matters: [hello@sparkhub.mv](mailto:hello@sparkhub.mv).

We follow the Constitution of the Maldives, applicable Maldivian law and internationally recognised data protection principles. When the Maldives' personal data protection legislation comes into force, we will comply with it and update this Policy.

## 2. Who this Policy covers

Visitors to the Platform; Founders, Mentors, Investors and representatives of Incubators/Accelerators who register or are named in a Listing; article authors; people who request Resource Hub documents; event attendees; and anyone who contacts us.

## 3. What we collect and why

| Data                                                                                                                      | Who it relates to                  | Why we use it                                        | Basis                        |
|---------------------------------------------------------------------------------------------------------------------------|------------------------------------|------------------------------------------------------|------------------------------|
| Name, email, phone, password (stored encrypted), role                                                                     | All Members                        | Create and secure your account; contact you about it | Contract                     |
| Listing details: startup name, logo, sector, stage, description, founders, website, social links, location, funding stage | Startups, Founders                 | Review eligibility; publish the approved Listing     | Contract; consent to publish |
| Profile details: photo, bio, expertise, employer, experience, LinkedIn, availability, any fees                            | Mentors                            | Review and publish the Mentor Listing                | Contract; consent to publish |
| Organisation details, investment focus, ticket size, sectors, programme details, contact person                           | Investors, Incubators/Accelerators | Review and publish the Listing                       | Contract; consent to publish |
| Supporting documents you send during review (e.g. registration certificate)                                               | Applicants                         | Verify eligibility; not published                    | Legitimate interest          |

| Data                                                                                    | Who it relates to  | Why we use it                                            | Basis                                                  |
|-----------------------------------------------------------------------------------------|--------------------|----------------------------------------------------------|--------------------------------------------------------|
| Articles, images and author details                                                     | Founders           | Review and publish articles                              | Contract; consent                                      |
| Email, document and category requested, document version, consent date, delivery status | Resource Hub users | Send the resource; keep a record of consent and delivery | Consent                                                |
| Event registration details                                                              | Attendees          | Run and follow up on events                              | Contract; consent                                      |
| Messages to us                                                                          | Anyone             | Respond and keep a record                                | Legitimate interest                                    |
| IP address, browser, device, pages viewed, cookies                                      | Visitors           | Keep the Platform secure; understand usage               | Legitimate interest; consent for non-essential cookies |
| Newsletter preferences                                                                  | Subscribers        | Send updates you opted into                              | Consent                                                |

We do not ask for sensitive data such as health, religious beliefs or national ID numbers. Please do not include it in Listings or articles.

## 4. What is public

Once approved, Listing details you submit for publication - including the names, photos and roles of Founders and Mentors, and any contact links you choose to show - are visible to anyone on the internet and may be indexed by search engines. Your login email, password, phone number (unless you choose to show it), review documents and Resource Hub records are never published.

## 5. How we use your data

To run the Platform and member portal; review and moderate Listings and articles; publish approved content; send service messages (approval decisions, account and security notices); deliver resources; organise events; send newsletters if you opt in; produce aggregated, anonymised statistics on the Maldivian startup ecosystem; prevent fraud and misuse; and meet legal obligations. We do not sell personal data, and we do not use it for automated decisions with legal or similar effects - every approval decision is made by a person on the Startup Maldives Team.

## 6. Who we share it with

- The public - approved Listing and article content (section 4).
- Partners - for running Platform programmes and events, under confidentiality obligations.
- Service providers - hosting, email delivery, analytics and IT support providers acting on our instructions, such as our cloud hosting and email delivery providers.

- Programme partners - only with your consent, for example if you apply to a programme through us.
- Authorities - where required by law or a valid legal request, or to protect rights and safety.
- A successor - if the Platform is transferred to another organisation, which must honour this Policy.

## 7. Cookies and analytics

We use strictly necessary cookies to keep you signed in and keep the Platform secure. With your consent, we may use analytics cookies to understand how the Platform is used. You can refuse or delete non-essential cookies through our cookie banner or your browser settings.

## 8. International transfers

Our Platform and service providers may store or process data outside the Maldives, including on cloud servers located in India. When this happens, we choose providers with recognised security standards and use contractual safeguards to protect your data.

## 9. How long we keep it

| Data                                       | Retention                                                                             |
|--------------------------------------------|---------------------------------------------------------------------------------------|
| Active accounts and Listings               | While your account is active                                                          |
| Closed accounts and removed Listings       | Deleted or anonymised within 90 days, unless needed for a dispute or legal obligation |
| Declined applications and review documents | 12 months after the decision                                                          |
| Resource Hub request and consent records   | 3 years                                                                               |
| Event registrations                        | 2 years                                                                               |
| Server and security logs                   | 12 months                                                                             |

Articles you published may remain in our archive as described in Terms section 8.2 unless you ask us to remove them.

## 10. Your rights

You can ask us to: access a copy of your data; correct it; delete it; restrict or object to how we use it; withdraw consent at any time (without affecting earlier use); and receive your data in a portable format. Most profile details can be edited in the member portal. For other requests, email [hello@sparkhub.mv](mailto:hello@sparkhub.mv). We will reply within 30 days and may need to verify your identity. If you are unhappy with our response, you may complain to the relevant Maldivian authority once one is designated under data protection law.

## 11. Security

We use reasonable technical and organisational measures, including encrypted connections (HTTPS), hashed passwords, role-based access for the Startup Maldives Team, and limited staff access to review documents. No online service is completely secure. If a breach is likely to put you at risk, we will tell you and any relevant authority without undue delay.

## 12. Children

The Platform is for people aged 18 and over. We do not knowingly collect data from children. If you believe a child has registered, contact us and we will delete the account.

## 13. Changes to this Policy

We may update this Policy. We will post the new version with a new date and notify Members of material changes by email or in the member portal.