

## PRIVACY POLICY

Last updated: November 10, 2022

This Privacy Policy describes policies and procedures that Traent S.r.l. adopts on the collection, use and disclosure of user's information when user uses the Service; this Privacy Policy also informs the user about user's privacy rights and how the law protects the user.

The Company manages user's Personal Data to provide and improve the Service. By using the Service, user agrees to the collection and use of information in accordance with this Privacy Policy.

### Interpretation and Definitions

#### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

#### Definitions

For the purposes of this Privacy Policy:

**Account** means a unique account created for the user to access Traent Service or parts of Traent Service.

**Company/Traent S.r.l.** (referred to as either the "**Company**" or "**Traent**") refers to Traent S.r.l., with its registered offices at Viale Coni Zugna, n. 71, (20144) Milan, Italy, VAT number 11036710967.

**Consent of the data subject** (refer to as "**Consent**") means any freely given, specific, informed, clear and explicit indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

**Country** refers to Italy as the registered offices for Traent S.r.l. and rest of the world.

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**Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

**Personal Data** is any information relating to an identified or identifiable natural person (referred to it as “**Data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Services** refer to the Website, the Platform and its Tools.

**Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

**Third-party Social Media Service** refers to any website or any social network website through which a user can log in or create an account to use the Service.

Usage Data refers to Data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

**Website** refers to Traent, accessible from <http://www.traent.com>.

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## Collecting and Using your Personal Data

### Legal Basis for Processing

User's Personal Data will be processed on the basis of the contractual relationship accepted during registration, as well as possibly also on the basis of the legitimate interest of the Controller and/or to fulfill a legal obligation. In addition, user's Personal Data may be processed for specific purposes if user has given clear and explicit Consent to them.

## Types of Data Collected

### 1. Personal Data

While using our Service, the Company may ask user to provide the Company with certain personally identifiable information that can be used to contact or identify the user. Personally identifiable information may include, but is not limited to:

- a. First name and last name
- b. Email address
- c. Phone number
- d. Address

While using our Service, user's Data may be also collected via other providers or organizations, as part of their collecting policies on their members' profile collecting of data, based on user's Consent to contact or identify the user.

### 2. Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as user's Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that user visits, the time and date of user visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When user accesses the Service by or through a mobile device, the Company may collect certain information automatically, including, but not limited to, the type of mobile device user uses, user's mobile device unique ID, the IP address of user's mobile device, user's mobile operating system, the type of mobile Internet browser user uses, unique device identifiers and other diagnostic Data.

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The Company may also collect information that user's browser sends whenever user visits Traent Service or when user accesses the Service by or through a mobile device.

## Use of user's Personal Data

The Company may use Personal Data for the following purposes:

**To provide and maintain Service**, including to monitor the usage of Service. Company collects user's device information in order to ensure the website is functioning properly, and to provide user with high-quality service when user is visiting the website and using its functionalities.

**To manage user's Account**: to manage user's registration as a user of the Service. The Personal Data user provides can give user access to different functionalities of the Service that are available to user as a registered user.

**For the performance of a contract**: the development, compliance and undertaking of the purchase contract for the products, items or services user has purchased or of any other contract with the Company through the Service.

**To contact user**: To contact user by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

**To provide user** with news, special offers and general information about other goods, services and events which the Company offers that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

**To manage user's requests**: To attend and manage user's requests to the Company.

**For business transfers**: The Company may use user's information to evaluate or conduct a merger, divestiture, restructuring, reorganization,

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dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by the Company about Service users is among the assets transferred.

**For other purposes:** The Company may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve Service, products, services, marketing and your experience.

The Company may share user's Personal Data in the following situations:

- **With Service Providers:** the Company may share user's Personal Data with Service Providers to monitor and analyze the use of Service, to contact user.
- **For business transfers:** the Company may share or transfer user's Personal Data in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** the Company may share user's Personal Data with our affiliates, in which case the Company will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that the Company controls or that are under common control with the Company.
- **With business partners:** The Company may share user's Personal Data with our business partners to offer user certain products, services or promotions.
- **With other users:** when user shares Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If user interacts with other users or register through a Third-Party Social Media Service, user's contacts on the Third-Party Social Media Service may see user's name, profile, pictures and description of user's activity. Similarly, other users will be able to view descriptions of user's activity, communicate with user and view his profile.

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- **With user Consent:** the Company may disclose user's Personal Data for any other purpose with user Consent.

## Retention of user's Personal Data

The Company will retain user's Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. The Company will retain and use user's Personal Data to the extent necessary to comply with our legal obligations (for example, if the Company is required to retain user's Data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Service, or the Company are legally obligated to retain this Data for longer time periods.

The Processing of user's Personal Data will be carried out in such a way as to ensure adequate security and confidentiality and to prevent unauthorized access or use of both Personal Data and the instruments used for their Processing. Therefore, user's Personal Data will be processed and stored in full compliance with the principles of necessity, data minimisation and limitation of the storage period, through the adoption of technical and organisational measures appropriate to the level of risk of the Processing.

## Transfer of user's Personal Data

User's information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the Processing are located. It means that this information may be transferred to – and maintained on – computers located outside of user state, province, country or other governmental jurisdiction where the Data protection laws may differ than those from user jurisdiction.

User Consent to this Privacy Policy followed by user submission of such information represents user's agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that user's Data is treated securely and in accordance with this Privacy Policy and no transfer of user's Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of user's Data and other personal information.

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## Disclosure of user's Personal Data

### Business Transactions

If the Company is involved in a merger, acquisition or asset sale, user's Personal Data may be transferred. The Company will provide notice before user's Personal Data is transferred and becomes subject to a different Privacy Policy.

### Law enforcement

Under certain circumstances, the Company may be required to disclose user's Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### Other legal requirements

The Company may disclose user's Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

## Security of your Personal Data

The Company agrees to utilize administrative, physical, and technical safeguards designed to protect user's Data from unauthorized access, disclosure, acquisition, destruction, use, or modification. The Company shall adhere to any applicable law relating to Data security. The Company shall implement an adequate cybersecurity framework based on one of the nationally recognized standards. Additionally, the Company may choose to further detail its security programs and measures in addition to the adopted standards.

## Children's Privacy

Our Service addresses to adults. The Company does not knowingly collect personally identifiable information from anyone under the age of 18. If user is a parent or guardian and user is aware that his child has provided the

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Company with Personal Data, please contact the Company. If the Company becomes aware that the Company has collected Personal Data from anyone under the age of 18 without verification of parental Consent, the Company takes steps to remove that information from our servers.

If the Company needs to rely on Consent as a Legal Basis for Processing user's information and user country requires Consent from a parent, the Company may require user's parent's Consent before the Company collects and uses that information.

## Links to Other Websites

Our Service may contain links to other websites that are not operated by the Company. If user clicks on a third party link, user will be directed to that third party's site. The Company strongly advises user to review the Privacy Policy of every site user visits.

The Company has no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## Changes to this Privacy Policy

The Company may update Privacy Policy from time to time. We will notify user of any changes by posting the new Privacy Policy on this page.

The Company will let user know via email and/or a prominent notice on Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

User is advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If user has any questions about this Privacy Policy, you can contact the Company:

- By visiting this page on our website: <http://www.traent.com>.

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