



PRIVACY POLICY

As the title owner of the treatment, pursuant to the EU Regulation n. 2016/679 (henceforth "GDPR"), the Wegreenit Holding Ltd. Company, registered in Piazzale Loreto, 17 - 20131 Milan (MI) Italy (henceforth "Wegreenit" or the "Company"), is committed to preserving and respecting its privacy.

1. Object of the treatment

The following notice (along with other documents cited therein) describes the personal data ("Personal Data") that the Company gathers from the website user and how it is treated.

- a) The company gathers personal information from website visits, including, by way of example, data on traffic, data on location, weblog, and contact modules, as well as other communication data and the access resources employed by the user.

The gathering of this personal information will facilitate future visits to the website, since the Company will be able to suggest pertinent content based on the location from which one accesses the site.

- b) The Company gathers all information provided by the user in sending the contact modules (for example, "Contacts"), specifically, first and last name, e-mail address, Fiscal Code, phone number, province, Partita Iva, company name. –

Providing personal information through contact modules is not a legal or contractual requirement; however, please note that the fields marked with an asterisk (*) are obligatory fields, since the Company needs this information to comply with or reply to the user's request. Other information or personal information will be shared upon contact module compilation upon the user's discretion. In case of contact with the Company, such correspondence will be tracked.

- c) Personal information will be used for direct marketing purposes via e-mail if this option has been accepted in the relative contact module.

It is possible to opt to no longer receive marketing communication at any moment.

- d) Additionally, the Company can save *cookies*, as described in more detail in the Cookie Policy.

2. Treatment Purposes

The Company gathers and treats Personal Data with the purpose of:

- a) adapting content and resources to the user's preferences;

- b) answering the user's questions or requests through phone or email;
- c) sending other information, via phone or email, which could be of interest to the user;
- d) creating, publishing, and improving email communication pertinent to the user;
- e) guaranteeing that the content supplied through the website is presented to the user in the most effective manner based on their device;
- f) allowing the user to engage with the website's interactive features, if they wish to;
- g) further developing and improving the website and systems to better serve the user.

The use of information described above is admitted by the law applicable in matters of Data Protection, as it is:

- a) necessary for the company's legitimate interests in pursuing the above objectives; such interests are in no way in conflict with the user's right to privacy;
- b) in some cases, necessary to conform to the Company's legal or regulatory responsibilities, for example, in the case of communications with the authorities, governmental or regulatory entities; or
- c) in some cases, necessary for the fulfillment of a public interest action, and, if the Company makes use of specific Personal Data categories, needed to open, carry out, or defend itself from legal action, or when the treatment pertains to private information that is clearly of public domain;
- d) in limited circumstances, with user consent granted each time, when agreeing to receive notifications and marketing communications via e-mail.

The Company does not take automatic decisions based solely on automatic processing, including profiling, which have legal repercussions on the user or other similar consequences.

The Company retains the information for the period of time that is needed to fulfill legal obligations. The personal information retention time depends on the purpose for which the data is being treated and on the tools with which said personal information is being treated.

It is not however possible to indicate the retention time in a reasonably understandable manner in the present notice. The criteria used to determine the applicable retention time are exclusively tied to the time (i) needed for the relative purpose, (ii) needed for the fulfillment of the commercial relationship with the user, (iii) accepted by the user and/or (iv) required by applicable laws on the matter.

3. Sharing of Personal Data with Third Parties

To facilitate the efficient use of information and to provide the user with content and/or resources, information is shared with third parties. However, this sharing will only take place under the following circumstances:

- a) with suppliers, contractors and agents: the Company could involve or rely on other companies and physical persons to carry out certain tasks on its behalf, for example, hosting and/or maintaining website content, or fulfilling specific functions contained within it, or providing marketing services or economic updates upon the user's request. The recipients will have access to personal information only to the extent of the fulfillment of their functions and will not be authorized to use them for other purposes. The recipients will be held to contractual privacy obligations;

- b) with governmental or judiciary authorities if the Company believes that the latter are legally required to request it.

4. IP Addresses and Cookies

The Company gathers information on computers and other technological devices. Such information includes (when available) IP address, operating system, and browser version, for system administration purposes. This is statistical data on the user's actions and navigating behaviours, which do not identify the person.

For the same reason, the Company can obtain information on the user's general internet use, through a cookie file in the device's memory. Cookies help to improve the website and provide better, more targeted content. For further information regarding the use of cookies on the website, see our Cookie Policy.

5. Personal Data Transfer

The Personal Data gathered can be transferred and treated in one or more nations within or outside of the European Union. Data is transferred outside of the EU only to those countries which the European Commission believes offer an adequate level of protection or in case the Company has implemented appropriate measures to ensure the preservation of the privacy of said information.

6. Data Security

Although the Company is committed to doing its best to protect personal information, we inform you that the ceding of information online is not completely secure and we cannot guarantee the security of the Personal Data transferred to the website or to third parties; for this reason, any transmission of data takes place at the user's own risk.

Rigorous operational procedures and technical and adequate organizational security measures are however enforced in order to prevent any non-authorized access, alteration, deletion or transmission of said personal information.

7. User Rights

Articles 15 to 22 of the GDPR grant the user, as the interested party, the exercise of the specific rights presented below:

- a) the right to access and obtain a copy of their Personal Data: the user has the right to request confirmation of the fact that the Company is treating any of their personal data. In which case, they will be able to access their own Personal Data and some information relating to its treatment. In some cases, they can request that the Company provide a digital copy of their data;
- b) the right to rectify the Personal Data: wherein they are able to prove the inaccuracy of their own Personal Data possessed by the Company, the user can request the update or rectification of said data;
- c) the right to the erasure/deletion of data: in certain circumstances, the user has the right to have their own Personal Data deleted. The request can be presented at any moment and the Company will consider the possibility of granting said request. However, this right is subject to legal rights or obligations which could oblige the Company to retain the data. If it is established that the Personal Data cancellation request can be granted, the Company will immediately do so, without unjustified delays;

- d) the right to raise objections: although the Company's treatment of the user's data is based on the legitimate interest of the former (and on no other motivation for treatment), the user has the right to object to the modality employed by the Company to treat their Personal Data in the context of their specific situation;
- e) the right to withdraw consent: seen as the treatment of their Personal Data relies on their consent, the user has the right to withdraw consent at any moment. The withdrawal of consent does not affect the legitimacy of any treatment based on the consent given prior to said withdrawal.

8. Procedures for the Exercise of Rights

In order to exercise their rights, the user can write to the following email address: privacy@wegreenit.it.

It is also possible to present a claim regarding the treatment of Personal Data to the local privacy authority.

9. Marketing Communications

The Company sends marketing communications via email only if the user has consented to this operation.

Normally, the modules that the Company uses to gather Personal Data include a box to check if one wishes to receive marketing communications. When marketing communications are sent via email, the user can decide not to receive further communications by clicking on "cancel subscription" or on the waiver function in the email. Additionally, they can exercise their right to withdraw their authorization at any moment by contacting the Company through the email address: privacy@wegreenit.it and providing the following information: name, email address, phone number and which marketing communications they no longer wish to receive.

10. Edits to the Current Privacy Policy

The conditions of the current notice are subject to change. The Company will publish potential substantial edits to the present notice via an appropriate notice on this website or by contacting the user through other channels.

11. Contacts

We inform you that questions, comments, and requests pertaining to the present notice should be addressed to the Company through the following email address: privacy@wegreenit.it.

Latest update: 10/14/2022