

PRIVACY POLICY

related to the web site www.lifeed.io owned by L.B.V. S.r.l.
pursuant to the Articles 13 and 14 EU/2016/679 Regulation and del Legislative Decree 101/2018
(modifying and integrated the Legislative Decree 196/2003)

1. Who is the Data Controller?

Pursuant to the Article 4, n. 7) EU/2016/679 Regulation, the **Data Controller** of the Data Subject's data processed with the web site www.lifeed.io is:

- **name:** the Company L.B.V. S.r.l., Vat n. and F.C. 09236350964;
- **registered office:** via Cadore n. 2 – 20092 – Milan (MI);
- **legally represented by:** Ms. Riccarda Zezza (F.C. ZZZ RCR 72C 58F 839Y);
- **contact:** e-mail: info@lifeed.io – phone n.: 373.81.57.081.

For the purposes of this Privacy Policy, **Data Subject** means each user and his co-obligated person who accesses, browse and/or interact with the web site www.lifeed.io and uses the same services offered.

Pursuant to and for the purposes of the Article 37 EU/2016/679 Regulation, Data Subject is informed that L.B.V. S.r.l. has appointed a **Data Protection Officer**, and more specifically:

- **name:** Avv. Savino Menna
- **registered office:** Via Borromei n. 2, 20123, Milano (MI)
- **contacts:** e-mail: dpo@lifeed.io – phone n.: +39.379.16.10.212.

2. What Data are processed?

The Data Controller processes the personal data provided by the Data Subject on the web site www.lifeed.io and during the usage of this; Data are related to:

- The **Personal Data** processed, pursuant to the Article 4, let. 1) UE/2016/679 Regulation, are:
 - Name and Surname;
 - URL, browser and IP address;
 - Pixel and Cookie.

The Data Controller does not need to process Data Subject's particular data pursuant to the Articles 9 and 10 UE/2016/679 Regulation and, for that reason, Data Subject does not give them to the Data Controller: despite of this, the information that the Data Subject freely provides through the use of our web site messaging form, will be processed in accordance with this Privacy Policy, the T&Cs present on the web site and in full compliance with the provisions of EU and national legislation on the matter (hereinafter personal data and particular data will be jointly referred to and defined as "**Data**").

3. For what purposes are the Data processed?

Data processing will be performed by L.B.V. S.r.l. for the following purposes:

a) Contractual Purposes:

1. to conclude contracts related to the services of L.B.V. S.r.l. through the web site www.lifeed.io;
2. to allow access to the www.lifeed.io web site;
3. to carry out advocacy activities (activities with the aim to influence public policies and the allocation of resources within political, economic and social systems);
4. to carry out reporting activities to Companies and scientific research connected to public institutions and aimed to ensure full respect for equal opportunities in professional and work development;
5. to fulfill the pre-contractual, contractual and tax obligations deriving from existing relationships with the Data Subject;
6. to fulfill the obligations established by law, by a regulation, by EU legislation or by an order of the Authority (such as for example in the matter of anti-money laundering, funded training);
7. to exercise the rights as Data Controller, such as, for example, the right to defense in court.

b) Legitimate Interest Purposes:

1. to carry out activities functional to any securitisations, assignments of credit and issue of securities, transfers of business and business unit, acquisitions, mergers, demergers or other transformations and for the execution of such operations;
2. to carry out checks aimed to prevent any fraud.

c) Marketing and Profiling Purposes:

1. to promote the products and services of Data Controller, also with advertising, commercial communication, market research and direct sales, both through traditional communication tools, such as paper mail, and through remote

Life Based Value Srl

communication tools, such as email, chat, newsletter, telephone, SMS, video call, automatic call, instant message, chatbot, intelligent interactive automated communication systems, banners, social networks, search engines and other remote communication tools; and

2. to profile Data Subject (e.g. internal profiling through CRM) in order to make the promotional activities indicated above and the services offered by the Data Controller better focused on the needs, habits and interests of the Data Subjects and the performance of planned and/or functional activities for the correct execution of these promotional initiatives. The profiling activities will be carried out through the planning of technical-organizational tools aimed at guaranteeing the security of the data transmitted and only in anonymous and aggregate form.

4. On what legal basis are the Data processed?

Data processing is carried out in compliance with the conditions of lawfulness referred to the Article 6 EU/2016/679 Regulation and more specifically:

- **Legal basis related to the Contractual Purposes referred to the Article 3, lett. a), n. from 1) to 5) of this Privacy Policy:** the contract between the L.B.V. Srl and the Data Subject: pursuant to Article 6, lett. b) EU/2016/Regulation, processing is necessary as it is aimed to the execution of the contract between the Data Controller and the Data Subject, the supply of the products and services requested and any information relating to them;
- **Legal basis related to the Contractual Purposes referred to the Article 3, lett. a), n. 6) and 7) of this Privacy Policy:** fulfillment of a legal obligation: pursuant to the Article art. 6, lett. c) of EU/2016/679 Regulation, the processing is necessary to fulfill the legal obligations to which the Data Controller is subject.

With particular reference to the purposes of advocacy, reporting and scientific research pursuant to Article 3) lett. a), n. 3) and 4), the Data processing is performed in accordance with the provisions of the Article 9 § 2 lett. h) and j) EU/2016/679 Regulation, Article 89 EU/2016/679 Regulation and by Chapter III of Legislative Decree n. 101/2018 modifying and integrated the Legislative Decree 196/2003.

The provision of Data for contractual purposes is mandatory: if the Data Subject does not provide such Data, the Data Controller will not be able to proceed with the registration of the Data Subject on the www.lifeed.io web site nor to provide the services offered.

- **Legal basis related to the Legitimate Interest Purposes referred to the Article 3, lett. b), n. 6) and 7):** the legitimate interest of the Data Controller or third parties: according to the Article 6, lett. f) EU/2016/679 Regulation, the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties, adequately balanced with the interests of the Data Subject in light of the limits imposed on such processing and the circumstances specific rooms where the processing takes place, illustrated in the Article 3 of the present Privacy Policy.

The processing of Data for legitimate interest purposes is not mandatory and the Data Subject may object by contacting the Data protection officer appointed by L.B.V. S.r.l.: if the Data Subject opposes said processing, his Data cannot be used for the purposes of legitimate interest, unless the Data Controller demonstrates the presence of prevailing binding legitimate reasons or the exercise or defense of a right pursuant to the Article 21 EU/2016/679 Regulation.

- **Legal basis related to the Marketing and Profiling Purposes referred to the Article 3, lett. c), n. 1) and 2):** Data Subject's Consent: the processing of data for Marketing and Profiling purposes is optional and, if the Data Subject denies his consent, he will not receive any commercial communications, will not participate in market research and will not receive communications and services adapted to his profile.

The lack of consent to the provision of Data for Marketing and Profiling purposes does not in any way prejudice the contractual relationships established with the Data Controller and the provision of the services offered by them. At any time, the Data Subject may revoke any consent given in the ways described into the Article 8 of this privacy policy.

5. How are the Data Processed?

The processing of Data is carried out pursuant with the operations indicated in the Art. 4 n. 2) of the 2016/679/EU Regulation and, more precisely, through: collection, recording, organization, storage, consultation, processing, modification, extraction, use, communication, deleting and destruction of data.

The Data may be processed using manual or IT tools, suitable to guarantee security, confidentiality and to prevent unauthorized access and violation of the Data processed.

The Data processed are stored using cloud computing tools on servers located within the EU territory (Ireland): for more information on safety standards and compliance with the requirements set by the 2016/679/EU Regulation adopted by the selected external providers, consult the web page <https://aws.amazon.com/it/privacy/>.

6. To whom are the Data communicated?

The Data may be communicated for Contractual Purposes to subjects who perform services connected and functional to the management of the existing contractual relationship or to be stipulated and, in particular, to the following categories of subjects located within the European Union:

- service providers connected to the activities of the Data Controller and public institutions;
- assistance, tax and legal advice;
- IT or storage service providers and external service providers.

The Data may be disclosed for Legitimate Interest Purposes, to suppliers of assistance services, technical, tax and legal consultancy, assignees of receivables in the context of credit securitization or credit assignment operations for strictly connected and instrumental purposes to the management of the relationship with the transferred Data Subject, as well as to the issue of securities, assignees of Company or business unit, potential buyers of LBV S.r.l. and Companies resulting from possible mergers, divisions or other transformations of the L.B.V. S.r.l., also in the context of the activities functional to these operations, and to competent authorities.

Finally, the Data may be communicated for Marketing and Profiling purposes to service providers such as external data processors and with the prior consent of the Data Subject. The subjects indicated above may act, as appropriate, as external data processors or independent data controllers. The updated list of companies to which the Data Subject will be communicated may be requested at any time to the Data Controller, by means of a specific request to be sent to the address referred to in paragraph 8 of this information. The data will not be subject to further disclosure with respect to what is indicated in this statement.

7. Are Data transferred abroad?

The Data may be freely transferred outside the national territory to countries located in the European Union.

The Data Subject will have the right to obtain a copy of the Data held abroad and to obtain information about the place where such data are stored, sending a specific request to the Data Controller contacting the Data Protection Officer designed by L.B.V. S.r.l.

8. What are the rights of the Data Subject?

The Data Subject, pursuant to the Articles from 15 to 22 EU/2016/679 Regulation, has the right to:

- obtain confirmation from the Data Controller that a processing of Data concerning him is in progress;
- obtain access to Data and information relating to the processing of Data concerning him;
- obtain from the Data Controller the correction of inaccurate Data concerning him without undue delay;
- obtain the integration of incomplete Data, also by providing an additional declaration;
- obtain from the Data Controller the cancellation of the Data concerning him without undue delay;
- obtain the limitation of processing from the Data Controller:
 - a) for the period necessary to verify the accuracy of such Data by the Data Controller, when the Data Subject disputes its accuracy;
 - b) when the processing is unlawful and the Data Subject opposes the deletion of the Data, requesting instead that its use be limited;
 - c) when the Data are necessary for the Data Subject to ascertain, exercise or defend a right in court, although the Data Controller no longer needs it for processing purposes;
 - d) when the Data Subject has opposed the processing pursuant to Article 21, paragraph 1 EU/2016/679 Regulation and for the whole period in which it remains pending verification of the possible prevalence of the legitimate reasons of the Data Controller with respect to those of the Data Subject;
- receive in a structured format, commonly used and readable by an automatic device, the Data concerning him provided to the Data Controller;
- transmit this Data to another Data controller without hindrance by the Data Controller to whom it has provided them;
- obtain the direct transmission of Data from one Data Controller to another, if technically feasible;
- object at any time, for reasons connected with your particular situation, to the processing of the Data that concern you pursuant to Article 6, paragraph 1, letters e) or f), including profiling;
- not be subjected to a decision based solely on automated processing, including profiling, which produces legal effects that concern him or which similarly significantly affects his person;
- propose a complaint directly to the Guarantor Authority if there is a violation of the data protection legislation by the Data Controller.

Requests for the exercise of the above rights can be sent to the Data Controller by contacting the Data Protection Officer designated by the L.B.V. S.r.l.

The right of complaint, however, can be freely exercised by the Data Subject sending an act of claim to the Privacy Authority in the way deemed most appropriate:

- letter A/R addressed to the "Guarantor for the protection of personal data, Piazza Venezia n. 11, 00187, Rome";
- certified e-mail message to the address ""protocollo@pec.gdpd.it".

9. Who are the external Data Processor?

The complete list of data processors is available by sending a written request to the Data Controller and/or the Data Protection Officer designated by L.B.V. S.r.l.

10. How long will the processed data be stored?

The Data processed by the Data Controller:

- for the Contractual Purposes and for the Legitimate Interest Purpose referred to Article 3, lett. b) n. 1), will be kept for a period equal to the duration of the Contract and/or service offered (including any renewals) and for the 10 years following the end, termination or withdrawal of the same, except in cases where the retention for a subsequent period is required for any disputes, requests from the competent authorities or pursuant to applicable legislation;
- as regards, specifically, the purposes of advocacy, reporting and scientific research, will be kept in compliance with the terms set out in this chapter and processed solely by means of anonymization and aggregate form;
- for the Legitimate Interest Purposes referred to the Article 3, lett. b) n. 2), will be kept for the duration strictly necessary to ensure the reliability of the checks indicated therein;
- for the Marketing purposes referred to in Article 3, lett. c), n. 1) of this privacy policy, will be kept for a period equal to the duration of the Contract and/or the service offered (including any renewals) and for a maximum period equal to 24 months from the expression of the consent by the Data Subject;
- for the Profiling purposes referred to in paragraph 3, lett. c), n. 2) of this privacy policy, will be kept for a period equal to the duration of the Contract and/or the service offered (including any renewals) and for a maximum period equal to 12 months from the expression of the consent by the Data Subject.

11. Modifications and Updates.

This Privacy Policy is effective from the date indicated below. The Data Controller may also make changes and/or additions to this privacy policy, also as a consequence of any subsequent amendments and supplements of applicable laws/regulations.

If substantial, the changes will be notified in advance and the Data Subject can find the text of it constantly updated on the website <https://lifeed.io/privacy-policy/> or sending a specific to the Data Controller and/or the Data Protection Officer designated by L.B.V. S.r.l.

Milan, 17 giugno 2020