

# PRIVACY POLICY

*related to the Lifeed web site*

Dear **Lifeed User**,

Surely you know the European Data Protection Regulation n. 679/2016 (also known as “GDPR”), the regulation about the protection of natural persons with regards to the processing of personal data and concerning the free movement of such data.

Pursuant to this Regulation and the Italian law, we share the necessary information for you to understand how we process your data collected via the Lifeed web site.

So, we invite you to read this page addressing any questions you may have. If you have any other questions, contact us. We are committed to protecting you and being transparent about our process.

Let’s go!

## Who is the Data Controller?

**L.B.V. S.r.l.** – VAT n.: 09236350964  
with registered office in via Cadore n. 2 – 20092 – Milano (MI)  
**e-mail:** [info@lifeed.io](mailto:info@lifeed.io)  
**Tel.** +39 373 8157081

L.B.V. S.r.l. is the data controller (hereinafter "**LBV**" and/or "**Data Controller**") of Users personal data (hereinafter also "**Data subject**") that use the Lifeed web site, including any subdomains (hereinafter "**Site**").

## How can I contact the DPO?

**e-mail:** [dpo@lifeed.io](mailto:dpo@lifeed.io)  
**Tel.** +39 379 1610212

Through the Site, LBV provides a set of “**Services**”, including digital training programs to understand the skills needed for employment and to learn useful tools to make the job search effective. Please read our Terms and Conditions for further details.

It is possible to use the Services through the Site or request and view a [demo](#) version of our Platform.

## What Data do we process with the Site?

- First and last name
- IP address, device and browser information
- Cookie e pixel (in accordance with our cookie policy)
- Business email address, username and password
- Telephone number, company and position
- Email address for the newsletter

LBV does not need to process further data than that described above. The additional information that the Data Subject provides through the existing messaging form in the Site will be processed in accordance with this Privacy Policy, the Terms and Conditions and the provisions of the European and national legislation (hereinafter this data will be jointly considered as "**Data**").

**Life Based Value S.r.l.**

What are the purposes of the Data processing?	What are the legal basis of the Data processing?	What is the Data retention?
<b>A. Allow access to the Site</b>	Legitimate interest of the Data Controller in providing its Services, and of the User himself to correctly use the Site	See our Cookie Policy
<b>B. Answer requests for information about the Services</b>	Legitimate interest of the Data Controller in answering to any requests from Users	The Data will only be kept for the duration necessary for the execution of the request
<b>C. Conclude contracts related to the Services and fulfill contractual obligations with the Users (contractual purposes)</b>	Fulfillment and contractual management for the provision of the Services offered. The provision of Data is necessary for the correct provision of the Services	The Data will be kept for a period equal to the duration of the Contract (any renewals included) and for the next 10 years (only related to tax and fiscal data, unless otherwise provided in accordance with the EU and national legislation)
<b>D. Fulfilling the administrative and accounting obligations provided for by the legislation (e.g. on anti-money laundering, accounting management and invoicing)</b>	Legitimate interest of the Data Controller in fulfilling the legal obligations	
<b>E. Carry out advocacy, reporting and scientific research activities</b>	Legitimate interest of the Data Controller in fulfilling the contract with the direct "client" company of LBV	The Data will be appropriately anonymized and solely communicated in aggregate form
<b>F. For the promotion of the Services through traditional and remote communication tools (marketing purposes, e.g. by Newsletter)</b>	Consent. This is optional and Users can withdraw it at any time	For a maximum period of 24 months from the consent of the Data Subject and in accordance with our Cookie Policy
<b>G. To analyze your preferences, habits, behaviors or interests of Community Users, in order to provide personalized Service offerings (profiling purposes)</b>	Consent. This is optional and Users can withdraw it at any time	For a maximum period of 12 months from the consent of the Data Subject

The Data is processed with manual or IT tools, also through automated tools, suitable to guarantee its security, confidentiality and to avoid unauthorized access.

The Data processed is 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 GDPR adopted by the selected external providers, consult the dedicated [web page](#).

After the data retention indicated above, the Data will be destroyed, deleted or anonymized, compatible with the technical procedures of deletion and backup.

### To whom is the Data communicated?

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

The Data collected through the Site will be processed only to ensure the correct use of the Services and may be viewed and used by the LBV team (employees and collaborators) appropriately authorized to process them.

The Data may be communicated 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 and companies resulting from possible mergers, divisions or other transformations of the LBV, also in the context of the activities functional to these operations, and to competent authorities.

The above-mentioned subjects may act, as appropriate, as external data controllers or independent data controllers in accordance with current legislation. You can request the updated list of companies to which the Data will be communicated at any time to the Data Controller, by means of a specific request to be sent using the contact information indicated in this Privacy Policy.

### Is the Data transferred abroad?

The Data will mainly be processed within the national territory and the European Union, but could also be transferred to extra EU Countries.

Any transfer of the Data of the Data Subject to countries located outside the European Union will take place only in compliance with adequate guarantees for the purposes of the transfer itself (and in particular complying with the provisions of art. 45, 46 and 49 of GDPR), e.g. provided that the European Commission has confirmed that the third country has an adequate level of data protection or other data protection guarantees exist, such as binding business rules or signing up to standard EU contractual clauses.

With particular reference to the processing "to and from the United Kingdom" (following the Brexit event), until 30 June 2021 the Data will not be considered as transferred to a third country; therefore, unless the European Commission and the UK Government reach an adequacy agreement before that deadline, there will be no change from what has been in place so far.

In any case, the processing of data is carried out in accordance with the national and supranational provisions in force in the field (Legislative Decree 196/2003, as amended and supplemented by Legislative Decree 101/2018, and EU Regulation 679/2016).

The Data Subject will have the right to obtain from the data controller a copy of the Data held abroad and to obtain information about the place where such data is stored making an express request to be sent using the contacts indicated in this document.

## What are the Data Subject rights?

By contacting the Data Controller and the DPO (using the above mentioned e-mail address) or the other contact information above, you can ask LBV at any time:

- access to the Data concerning you, the rectification of inaccurate Data, the integration of incomplete Data, their deletion (right to be forgotten), the limitation of processing in the cases provided for art. 18 GDPR;
- to receive in a structured format, common use and readable by automatic device the Data concerning you in the cases provided for by art. 20 GDPR; and, if technically feasible, to transmit such data to another data controller without hindrance;
- to withdraw the consent given at any time; as well as oppose at any time the processing of Data pursuant to art. 21 GDPR, giving evidence of the reasons justifying the opposition;
- any other request for clarification regarding the processing of Data carried out by the Data Controller.

Finally, we remind you that it is always possible to make a complaint to the competent Supervisory Authority (Guarantor for the Protection of Personal Data) pursuant to art. 77 of the GDPR, if it considers that the processing carried out by the Data Controller is contrary to the actual legislation.

The Data Controller may make changes and/or additions to this Privacy Policy, also as a result of changes in the applicable legislation. You can view the text of the Privacy Policy constantly updated at the our [Site](#) in the Privacy Policy section or make an explicit request by contacting the Data Controller or the DPO directly using the contact information indicated above.