



Weltix

Weltix S.p.A.

Notice on the Processing of Personal Data **Application**



NOTICE ON THE PROCESSING OF PERSONAL DATA APPLICATION FOR REGISTRATION

Weltix S.p.A. (hereinafter also the “Data Controller”) provides the Data Subject – i.e. the person to whom the personal data relate – with the following information pursuant to Article 13 of the European Regulation on the protection of personal data (Regulation (EU) No. 2016/679, hereinafter also “GDPR”). This notice is intended to describe the characteristics of the processing carried out in relation to the personal data provided by the Data Subject and the measures adopted to protect their rights.

This notice is published on the Weltix S.p.A. website at www.weltix.tech (hereinafter also the “Website”) in the “Register” section. This notice is periodically updated to reflect applicable legislation or new methods of processing personal data.

Data processed, purpose, retention period and legal basis of processing

Data processed	Purpose	Retention period	Legal basis
- Personal identification data - Contact data - Data relating to investment intentions	a) To assess the Data Subject’s application in order to enable registration on the Website	The data will be retained for two years, if the application is accepted. Otherwise, they will be deleted within twelve months.	Performance of pre-contractual measures taken at the request of the Data Subject
- Personal identification data - Contact data	b) Sending of periodic newsletters	The data will be retained for 60 months, unless consent is withdrawn earlier.	Consent of the Data Subject

Methods of processing personal data

Personal data are processed in pursuit of the Purpose indicated in this notice, including by automated means on electronic media.

Following the application request, the Data Controller may also contact the Data Subject by telephone for a preliminary, exploratory interview in order to assess the registration request.

Mandatory or optional nature of the provision of data

The provision of the data required to pursue the Purpose set out

- under letter (a) is **mandatory** and refusal to provide such data will make it impossible for the Data Controller to assess the Data Subject’s application for registration on the Website.
- under letter (b) is **optional** and refusal to provide such data will make it impossible for the Data Controller to send newsletters.

Categories of recipients to whom personal data may be disclosed

The processing of the personal data provided may be carried out, in compliance with the principle of strict necessity of the processing, both by internal personnel (Article 29 of the GDPR or Article 2 *quaterdecies* of Legislative Decree No. 101/2018) and by external parties (Article 28 of the GDPR).

Within Weltix

The data will be processed by personnel belonging to the following departments:

- Administrative Department
- Marketing and Customer Service Departments

Outside Weltix

The data will be processed by parties belonging to the following macro-categories:

- service providers engaged by the Data Controller to carry out activities instrumental to achieving the Purpose (e.g. software providers, cloud partners, data centres, consultants). Service providers appointed as External Data Processors (Article 28 GDPR) will be subject to contractual and regulatory obligations in order to maintain the confidentiality of the data and will only have access to the information necessary to carry out their functions.
A complete named list of the External Data Processors is made available upon request by the Data Subject.
- Third parties, acting as independent Data Controllers, whose right to access the Data Subject's personal data is recognised by provisions of European Union law or Italian law (e.g. competent Authorities for the fulfilment of legal obligations, and public Administrations for their institutional purposes).

Dissemination of data

The data will under no circumstances be disseminated.

Place of processing

The storage of data is entrusted to Salesforce.com Italy S.r.l., Piazza Filippo Meda 5, 20121 Milan (MI), VAT No. 04959160963, which, in performing the contract, may store the data outside the European Economic Area. Should this occur, the transfer would be lawful pursuant to Article 47 of the GDPR, as Salesforce.com has adopted Binding Corporate Rules updated as of July 2020 (also known as B.C.R., available on the website www.salesforces.com)

Rights of the Data Subject

The Data Subject may exercise the following rights against the Data Controller:

- **Right of access:** the right to obtain a copy of the personal data we hold and that are subject to processing.
- **Right to rectification:** the right to rectify the personal data held by the Data Controller where they are not up to date or accurate.
- **Right to object** to the processing of personal data for commercial Purposes: the Data Subject may request that the Data Controller cease sending commercial communications at any time.
- **Right to object** to decisions based solely on automated processing: the Data Subject may request not to be subject to decisions based solely on automated processing, including profiling.
- **Right to withdraw** consent given: the right to withdraw consent given for a specific processing activity at any time.
- **Right to lodge a complaint with the Data Protection Authority:** the right to lodge a complaint with the Data Protection Authority should the Data Subject have concerns regarding the processing of personal data carried out by the Data Controller.

The Data Subject may also exercise the following rights where certain circumstances apply:

- **Right to erasure:** the Data Subject may request that the Data Controller erase their personal data where the purposes of the processing have ceased and there are no legitimate interests or legal



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provisions requiring its continuation.

- **Right to object** to a processing activity: the Data Subject may request that the Data Controller cease carrying out a specific processing activity on the Data Subject's personal data.
- **Right to restrict** processing: the right to request that the Data Controller restrict the processing operations carried out on the Data Subject's personal data.
- **Right to data portability**: the right to obtain a copy of the data in a structured, commonly used and machine-readable format from another Data Controller.

To exercise any of the above-mentioned rights, the Data Subject may send an email or write to the following address, specifying the request and providing the Data Controller with the information necessary to correctly identify the sender (also attaching a copy of their identity document):

- by email: privacy@weltix.tech
- by post: Weltix S.p.A., Milan, Piazzale Cadorna No. 13 – 20123

Weltix will respond within one month. If for any reason the Data Controller is unable to respond, it will provide a detailed explanation of why it cannot fulfil the request.

Data Controller

The Data Controller is Weltix S.p.A., with registered office in Milan, Piazzale Cadorna No. 13 – 20123 – VAT No. 09650010961 - email: privacy@weltix.tech