



## PRIVACY POLICY

made pursuant to art. 13 and 14 of EU REGULATION N. 2016/679 ("GDPR")

The objective of UCapital24 S.p.A. (the "**Company**," the "**Data Controller**", or "**We**") is to connect all economic and financial operators and business users on a global scale by serving as an "aggregator" between supply and demand and making available through the web platform of the same name fintech services and content, including an innovative platform, also usable through an App, which enables UCapital24 to be positioned in the market as the world's leading Social Media fintech company.

### 1. Introduction:

Within the UCapital Social are available the typical features of a social network. Our Registered Users of the Social ("Users") share the personal information entered within their profile as outlined below and in the Terms and Conditions of Use of the platform, interact with their network, exchange information, and may post and view content, exchange messages and create groups, public or private. Content and data published in the Social are visible to external users because a guest version is planned.

From the Social it is also possible to access the Shark and the Media platforms, of the same Data Controller, within which multiple services are available both free and paid, which can be accessed following the creation of an account within the UCapital social network through a single sign on system that allows the creation of a personal area on all the platforms.

The UCapital Sharks platform offers an extensive repository of investors from around the world, including Family Offices, Venture Capital, Asset Managers, and Business Angels, along with a Marketplace that brings together business listings aimed at those seeking acquisitions, capital investments, or strategic alliances. It also offers, for information, a showcase of real estate properties available for both rent and sale worldwide.

The Media site, on the other hand, can be considered a full-fledged newspaper providing economic and financial information. It can be accessed directly from Social but for the processing of personal data carried out by that site, it is advisable to consult its privacy policy.

In this context, this Privacy Policy, to be consulted in conjunction with the **Cookie Policy**, applies to Data Subjects's use of our Services and how their data is collected and processed. Specifically, this policy applies to the sites <https://ucapital.com> and <https://sharks.ucapital.com> and other related sites, applications, communications, promotional landingpage and services of the Data Controller UCapital24 ("Services") unless explicitly provided otherwise with a dedicated privacy policy.

Where not otherwise specified, this *Policy* applies as a disclosure - pursuant to Articles 13 and 14 of Regulation (EU) No. 2016/679 (hereinafter the "**GDPR**") - made to those who interact with the above sites ("**Users**", "**Interested Parties**", or "**You**").

### 2. Data controller. Data Processors.

In relation to the personal data collected that is the object of this Privacy Policy, the Data Controller is **UCapital24 S.p.A.**, with registered office at Via dei Piatti 11, 20123, Milan (MI), C.F. and P.IVA 10144280962, e-mail [privacy@ucapital24.com](mailto:privacy@ucapital24.com). The updated list of data processors is available upon request at the Data Controller's office.

### 3. Data Protection Officer.

The Data Controller has appointed a Data Protection Officer ("DPO" or "RDP"), pursuant to Article 37 of the GDPR, who is responsible for supervising compliance with data protection regulations and acting as a point of contact for data subjects and who can be contacted for any needs pertaining to the processing of personal data by writing to the following e-mail address: [dpo@ucapital24.com](mailto:dpo@ucapital24.com).

### 4. Categories of personal data processed, source from which they originate, and why we use Data Subjects' data. Purposes and legal basis of the processing. Consequences if data is not provided.

Following is a list of all the *purposes* for which we collect personal data from Users of the sites covered by this policy, *legal basis* of processing and *Legitimate interests* pursued.

Personal data collected will be processed:

- a) **For browsing the websites and App and activities related to their functioning and operation:**
  1. **Purposes of processing:** to enable web browsing of the websites and, in the case of computer crimes, to ascertain possible liability.
  2. **Processed data:** The computer systems and software procedures responsible for the operation of the web page acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses, domain names, URIs.
  3. **Legal basis:**
    - i. provision of services aimed at enabling Users to browse the sites and use the App, execution of contractual or pre-contractual measures pursuant to Art. 6 c. 1 lett. b) of the GDPR;
    - ii. legitimate interest consisting in ensuring the proper functioning of computer systems and to proceed with the investigation of possible crimes (possibly also based on the existence of a legal obligation) pursuant to Art. 6 c. 1 lett. f) of the GDPR.
  4. **Retention period:** 30 days after the date of collection, unless legal provisions or orders of Public Authorities impose a different retention time in connection with investigations related to possible computer crimes.
  5. **Provision of personal data:** the provision of data is mandatory for the pursuit of the legitimate interests of the Data Controller indicated in the points above. Failure to provide it will result in the impossibility of following up on the User's requests and carrying out the activities indicated above.
- b) **Registration to the restricted area on the Social that also makes it possible to access the Shark platform and the Media site through a single sign-on system:**
  1. **Purposes of processing:** creation of a restricted area ("account") that will allow Users to use the related Social Network services, as well as the sections dedicated to Shark and Media, according to the terms and conditions governing their access and use. These latter platforms will in fact be accessed through the same credentials as the Social Network.
  2. **Processed data:** personal data required on the sign-up page for account registration, as specified below.
    - i. The following data are required during registration: first name, last name, email and password. It is also required for the user who wants to register to declare that he or she is at least 16 years of age. The provision of such data also applies to Sharks and Media website. The provision of these data is mandatory; not providing them does not allow the account registration to be completed. The aforementioned data, with the exception of the email, will be public on Users's social profiles.

- ii. Subsequent to registration, additional data are collected, at optional provision and completion of the personal profile within the Social Network only. In fact, it is possible for each User to enrich their personal profile with the following information: gender, location, employer, job position, cell phone number. The aforementioned data, which are given optionally, when included in one's profile will be public and therefore visible to all Users within the Social Network. It is not necessary for Users to publish or upload such additional personal data, however, not completing one's profile could limit the ability of Users to expand and interact with their network and make the most of the services offered.

It is up to individual Users to choose whether to include sensitive information on their profile. Users are urged not to post or add personal information to their profile that they do not wish to make publicly available.

3. **Legal basis:** execution of the Social Network registration contract, with single sign on for other platforms, which includes making the social features of the platform available and making Shark and Media accessible, in accordance with Art. 6 c. 1 lett. b) of the GDPR.
4. **Retention Period:** We will retain Users's personal data as long as they keep their accounts open or as necessary to provide our Services. This includes both data that Users provide directly and data that other people have provided to us with reference to them and data generated by the use of our Services. If you choose to close your social account, your personal data will no longer be visible within the UCapital social generally within 24 hours and will normally be deleted within 30 days. Users are warned that this action is irreversible, consequently, it will not be possible to recover their account and profile contents. The above deletion will also involve Market Intelligence and Shark accounts. In case the User still has active subscriptions and still wants to use them, deletion from the Social is discouraged because after that any subscription license will no longer be usable. We may retain Users's personal information even after accounts are closed where necessary to fulfill legal obligations, meet regulatory requirements, resolve disputes, maintain security, and prevent fraud and abuse. Information that Users have shared with third parties (posts, interactions, comments) will be permanently deleted. Posts by Users who have deleted their accounts will be deleted, including any comments or interactions by other Users.
5. **Provision of personal data:** The provision of personal data is optional, but necessary (with regard to the data defined as mandatory and highlighted with an asterisk) for the use of our services: therefore, in the absence of the provision of this information we will not be able to make available the service requested by the User.

c) **Social Features:**

1. **Purpose of processing:** To enable Users of the Social UCapital to take advantage of the features made available.
  - i. Our Services allow you to view and share information by publishing posts, (can be written text, photos, videos), following other users, and commenting on content. When Users share a post, they should be aware that it can be viewed by all and shared again anywhere where it is set as visible to all. The possibility is given to create content by setting the visibility of the same only to connections. It should be noted that any Social User may post content that includes information about other Users, (as part of posts, comments and videos) as part of our Social Services and will assume any resulting responsibilities as governed in the Terms of Service.
  - ii. It is possible for Users to create Groups called Floors, in which posts are visible to other members of the group. Membership in Groups is public and is indicated within the Users profile. Groups in turn can be public or private depending on the settings predefined by the group founder, who may or may not also allow floor members to extend the invitation to their own connections and require administrator approval of individual posts before they are published on the Floor.
  - iii. Our services allow Users to stay connected and up-to-date with their network by sending connection requests or choose to accept the connection sent by other Users. When Users

follow a person or organization, that information is visible to other Users and the "page owner" as a connection.

- iv. We send notifications to alert our Users of connection requests, of receiving messages, of other Users's reactions on their content (shares, likes, comments), of being added to a group and other notifications that will be explained below. Social actions are associated with individual Users and thus with their name, profile, and photo, if uploaded.
  - v. An internal chat system within the Social is made available to Users, on which it is possible to exchange messages and also create group chats, both public and private.
  - vi. It is possible to launch polls that are customizable in terms of the number of options that can be voted on and to which a duration can be assigned that is also customizable.
  - vii. Users are given the opportunity to save content of their interest, which will then be collected in a dedicated section of the personal profile.
  - viii. You are given the option of flagging other users' posts by going to select from a drop-down menu the reason why you consider the post inappropriate.
2. **Processed data:** Users' posts (photos, written texts, videos), information about Users's social actions as described above, and any other information added and uploaded by Users.
  3. **Legal basis:** execution of the Social Network registration contract, which includes that of making available the Social functions of the platform in accordance with Art. 6 c. 1 lett. b) of the GDPR.
  4. **Retention Period:** personal data about individual Users will be retained as long as their respective accounts are active.
  5. **Provision of personal data:** the provision of such additional data related to the social actions of Users is optional, it will therefore depend on the ways in which Users will interact within the platform and take more or less full advantage of the features made available to them.

**d) Notifications for social interactions between UCapital Social Network Users.:**

1. **Purpose of processing:** for sending notifications about the interactions of Users registered with the social UCapital. These notifications are always received within the notification center of the Users's profile, while only for some social actions, as indicated below, email notifications can also be activated and customized.
2. **Data processed:** for some notifications may be processed the data of users' location, detected through the geolocation system of individual devices, (if active). Notifications may relate to the following actions:
  - i. Connection requests;
  - ii. Receipt of single/group messages;
  - iii. Post and articles engagements (like, comments, reactions, share);
  - iv. Connection anniversaries;
  - v. Recommendation and endorsements;
  - vi. Floor activities (invitations, posts, interaction within the Floor);
  - vii. Events invitation;
  - viii. Platform updates;
3. **Legal basis:**
  - i. of the contract for signing up and maintaining an account within the Social Network, which includes making available the social features of the platform in accordance with art. 6 c. 1 lett. b) of the GDPR.
  - ii. Consent given regarding push notifications and email notifications through the activation of notifications within the social and the activation of email notifications from the personal area pursuant to Art. 6, c. 1, lett. a) of the GDPR, which can be revoked at any time by changing your settings from the personal area.

4. **Retention Period:** We will retain Users's personal data as long as they keep their accounts open or as necessary to provide our Services. This includes both data that Users provide directly and data that other people have provided to us with reference to them and data generated by the use of our Services. If Users choose to close their account, their personal data will no longer be visible within the Social generally within 24 hours and will normally be deleted within 30 days. Users are warned that this action is irreversible, consequently, it will not be possible to recover their account and profile contents. We may retain Users's personal data even after accounts are closed where necessary to comply with legal obligations, meet regulatory requirements, resolve disputes, maintain security, and prevent fraud and abuse.
5. **Provision of personal data:** the provision of such additional data related to the social actions of Users is optional, it will therefore depend on the ways in which Users will interact within the platform and take more or less full advantage of the features made available to them.

e) **Informational Communications to Social UCapital Users:**

1. **Purpose of processing:** to send notifications in the personal area regarding the availability of our services, support messages on the use of services and security, notices about new services available and legal notices.
2. **Data processed:** first name, last name and users's social data.
3. **Legal basis:** legitimate interest of the Data Controller to inform members of the Social about new services offered, useful communications for the purpose of the usability of existing services and legal notices such as informing users about new documents uploaded within the platform (privacy / terms and conditions updates) pursuant to Art. 6, c. 1, lett. f) of the GDPR.
4. **Retention Period:** for the duration of the existing relationship with the User, i.e. as long as the account is active.
5. **Provision of personal data:** the provision of data is mandatory: it is not possible for Users to refuse to receive service messages such as those indicated in this section from the Data Controller.

f) **Support service within the Social UCapital:**

1. **Purpose of processing:** The Data Controller makes available to Users, within the Social, a dedicated help and support section, within which it is possible to send requests for assistance by selecting the topic from a drop-down menu and specifying the request better with a free-text message.
2. **Data processed:** data necessary to respond to requests that will be addressed to our Support.
3. **Legal basis:** execution of the contract of purchase and sale of products or pre-contractual measures taken as a result of a request from the data subjects pursuant to Article 6, c.1, lett b) of the GDPR.
4. **Retention period:** time strictly necessary to fulfill the requests of data subjects.
5. **Provision of personal data:** The provision of personal data is optional, but necessary to manage and process the requests of Interested Parties. Failure to provide the data will result in the inability of the Data Controller to handle the requests of the Interested Parties.

g) **Filling out forms within the sites of the Data Controller and the subject of this policy:**

1. **Purposes of processing:** by filling in forms within the Data Controller's websites, Data Subjects may, depending on specific indications, obtain information about the services provided by the Data Controller, access dedicated promotions or request to be contacted.
2. **Data processed:** e-mail, first name, last name, telephone number.
3. **Legal basis:** execution of the contract of purchase and sale of products or pre-contractual measures taken as a result of a request from the data subjects pursuant to Article 6, c.1, lett b) of the GDPR.
4. **Retention period:** two years after completion of the form.
5. **Provision of personal data:** The provision of personal data is optional, but necessary to handle and process requests from Interested Parties. Failure to provide the data will result in the inability of the

Data Controller to handle the requests of the Interested Parties. It should be noted that the telephone number is always optional provision.

h) **Online purchase of products offered on the Shark site.**

1. **Purposes of the processing:** fulfillment of purchase orders placed online and performance of related activities (sending the purchase confirmation email and, subsequently, support in the activation of services, invoicing, payment management, possible activation of the order refund process, etc.).
2. **Data processed:** contact and billing data: first name, last name, e-mail address, telephone number, data for billing purposes such as residential address, tax code, VAT number, recipient code (SDI). We do not process data related to the means of payment indicated by customers (e.g., payment card number and security code), which are instead collected exclusively by the operator of the chosen payment service.
3. **Legal Basis:** The processing of such data does not require the consent of the Data Subjects as it is necessary for the performance of a contract to which the Data Subject is a party or the execution of pre-contractual measures taken at the request of the Data Subject pursuant to Article 6, c.1, lett b) of the GDPR.
4. **Retention period:** time required to fulfill contractual and regulatory obligations regarding the purchase and sale of products and services (e.g., tax regulations), usually 10 years from the date of purchase.
5. **Provision of personal data:** The provision of personal data is optional, but necessary to manage and process requests from Interested Parties and for the fulfillment of contractual obligations on the part of the Data Controller. Failure to provide data will result in the inability of the Data Controller to fulfill its contractual obligations.

i) **Creation of advertisements cards on the Shark Marketplace:**

1. **Purpose of the processing:** Following the purchase of a subscription license, it is possible for Users to create cards i.e. "company", "investor" or "advisor" profiles, to be entered within the Market place in which there may be personal data of individuals because, for example, they hold management positions within the company, or because the advisors are themselves individuals.
2. **Data processed:** personal data entered within the cards, such as first name, last name, professional position of individuals within the company. . **Please note:** The licensed user assumes all responsibility regarding the data entered into the cards as governed by the terms and conditions of use of the platform.
3. **Legal basis:** execution of the contract of purchase and sale of products or pre-contractual measures taken as a result of a request from the data subjects pursuant to Article 6, c.1, lett b) of the GDPR.
4. **Retention Period:** Cards created by Users will remain on the platform even after the subscription expires or after the account is deleted, as an information source for the benefit of Platform Users.
5. **Provision of personal data:** The provision of personal data is optional, but necessary to execute the contract. Failure to provide the data will result in the inability of the Holders to execute the license agreement having to do with the creation of the cards and ads.

j) **Filling out forms to request contact with the desired advertiser with reference to the Shark platform:**

1. **Purpose of processing:** through the completion of the form present under each advertisement or card in the different sections of the Shark website, Interested parties can request to be put in contact, through the UCapital24 company, with the advertiser who created the advertisement for which they have a certain interest. Following completion of the form, an email is sent to a dedicated UCapital24 account that will handle the request.
2. **Data processed:** first name, last name, e-mail, phone number, and free text message.

3. **Legal basis:** execution of the contract of purchase and sale of products or pre-contractual measures taken as a result of a request from the data subjects pursuant to Article 6, c.1, lett b) of the GDPR.
4. **Retention period:** two years after completion of the form.
5. **Provision of personal data:** The provision of personal data is optional, but necessary to manage and process the requests of Interested Parties. Failure to provide the data will result in the inability of the Data Controller to handle the requests of the Interested Parties.

k) **Support /Customer Care service for services rendered at the various sites covered by this policy:**

1. **Purpose of processing:** The Data Controller makes available to Users, once logged in on the various sites/platforms, a support service via chat (where present) and via email (appropriately indicated within the sites) to receive support with reference to problems in the use of the services rendered by the Data Controller.
2. **Data processed:** data necessary to respond to requests that will be addressed to our Support.
3. **Legal basis:** execution of the contract of purchase and sale of products or pre-contractual measures taken as a result of a request from the data subjects pursuant to Article 6, c.1, lett b) of the GDPR.
4. **Retention period:** time strictly necessary to fulfill the requests of data subjects.
5. **Provision of personal data:** The provision of personal data is optional, but necessary to manage and process the requests of Interested Parties. Failure to provide the data will result in the inability of the Data Controller to handle the requests of the Interested Parties.

l) **Proximity marketing (soft spam) to its customers/users:**

1. **Purpose of processing:** for the Data Controller to send information via e-mail for informational/promotional purposes of products and/or services provided by the Data Controller (and not by third parties) regarding services similar or related to those already purchased or for which the User has registered or shown interest (so-called "soft spam").
2. **Data processed:** contact data such as first name, last name, e-mail.
3. **Legal basis:** If the data subject is already a customer of the Data Controller, or has registered or demonstrated interest in certain services and there is a balance of interests, or has created an account on the Social UCapital, the legal basis may consist of the legitimate interests of the Data Controller (pursuant to Art. 6 c. 1 lett. f) of the GDPR) and therefore consent is not required for sending occasional advertising communications.
4. **Retention period:** for the duration of the contractual relationship with the customer or as long as the User has the active account within the Social UCapital or until the User who has demonstrated interest in a service or product does not exercise the right to object to the processing of his/her personal data for marketing purposes.
5. **Provision of personal data:** the provision of data is optional. Failure to provide data will have no consequence on the usability of the services and it remains at the complete discretion of the User to decide to object to the processing of their personal data for marketing purposes.

m) **Sending commercial communications where consent has been given by Users (for direct marketing purposes):**

1. **Purpose of processing:** sending commercial communications by e-mail and telephone regarding products and services offered by the Data Controller.
2. **Data processed:** contact data (first name, last name, e-mail address, phone number).
3. **Legal basis:** the express consent of the data subjects provided at the time of registration pursuant to Article 6, c. 1, lett. a) of the GDPR, which can be revoked at any time by writing to [privacy@ucapital24.com](mailto:privacy@ucapital24.com).

4. **Retention period:** until consent is revoked by the Data Subject.
5. **Provision of personal data:** the provision of personal data is optional. Failure to provide data will have no consequence on the usability of the services and remains at the complete discretion of the Data Subject.

**n) Participation in market research and satisfaction questionnaires:**

1. **Purpose of processing:** to collect information about users's interests and preferences as well as opinion regarding the quality of our online products and services and our support service.
2. **Data processed:** depending on the type of market survey the following data may be processed: first name, last name, contact data, data provided during the market survey or questionnaire completion.
3. **Legal basis:** the express consent of the data subjects given during registration to the Social or by filling in any questionnaire in accordance with Art. 6, c. 1, lett. a) of the GDPR, which can be revoked at any time by writing to [privacy@ucapital24.com](mailto:privacy@ucapital24.com).
4. **Storage period:** up to one year after their collection.
5. **Provision of personal data:** the provision of personal data is optional. Failure to provide data will have no consequence on the usability of the services and remains at the complete discretion of the Data Subject.

**o) Profiling:**

1. **Purpose of Processing:** Profiling allows the Data Controller to send Users commercial communications tailored to their profile and browsing habits as well as to develop products and services consistent with the preferences of their Users and Customers.
2. **Data processed:** data related to Users' purchases - including those related to other services offered by the Controller - country of origin, gender and age, interactions with the Controller through its websites, through Apps - which may be developed by the Controller or by third parties - with particular reference to saved posts and content and through social channels (e.g. Facebook, X, LinkedIn Telegram). The Owner may also examine data related to the use of the services provided by them. Finally, they may enrich the profile of Users with information of a statistical nature that they may lawfully acquire from other sources: for example, in relation to the area of residence (such as demographic information, geo-referencing data, etc.) or the electronic tools used to interact with the Controller.
3. **Legal basis:** the consent of the data subject (pursuant to Art. 6 c. 1 lett. a) GDPR), which can be given by accepting cookies and can be revoked at any time from the page dedicated to cookie management present within their personal area in the Data Privacy section or by writing to [privacy@ucapital24.com](mailto:privacy@ucapital24.com).
4. **Retention Period:** data related to Users' interactions with the Owner will be retained for the 12 months starting from the date of collection; information related to purchases will, on the other hand, be retained for 3 years starting from the date each purchase is made.
5. **Provision of personal data:** the provision of data is optional. Failure to provide data will have no consequence on the usability of the services and remains at the complete discretion of the User.

**p) For registration for the newsletter service:**

1. **Purpose of processing:** to send informative email communications that will cover both news regarding the services offered by the Data Controller and economic and financial updates.
2. **Data processed:** first name, last name, email.
3. **Legal basis:** the consent of the data subject given during registration or later from the personal area (pursuant to Art. 6 c. 1 lett. a) GDPR), which can be revoked at any time by clicking on the unsubscribe button in the footer of the emails or through the personal area from the notification section.



4. **Retention period:** the personal data of the Data Subjects will be processed until they decide to unsubscribe from the service by clicking on the unsubscribe button in the footer of the emails or in the other indicated ways.
5. **Provision of personal data:** the provision of personal data is optional. Failure to provide data will have no consequence on the usability of the services and remains at the complete discretion of the Data Subject.

q) **Legal obligations to which the Data Controller is subject:**

1. **Purpose of the processing:** to fulfill legal obligations to which the Data Controller is subject (e.g. accounting, tax, administrative) or to protect the security of Users, of the Data Controller itself or third parties.
2. **Processed data:** any acquired data of Users that is necessary for the Controller to fulfill the legal obligations to which it is subject or the defensive needs referred to above.
3. **Legal basis:** the processing is necessary to fulfill a legal obligation to which the Data Controller is subject pursuant to Article 6, c. 1, lett. c) of the GDPR.
4. **Retention period:** the Data Controller will process the Personal Data of the data subjects for the time strictly necessary to achieve the aims stated in the purposes.
5. **Provision of Personal Data:** the provision of data is mandatory in order to comply with legal obligations of the Data Controller indicated in the points above. Failure to provide it will make it impossible for the Data Controller to carry out the activities indicated above.

r) **Anti-fraud and ascertainment, exercise or defense of a right:**

1. **Purpose of the processing:** : to verify the correspondence between the acquiring party and the holder of the selected payment instrument and more generally for the establishment, exercise or defense of a right of the Data Controller, including in court.
2. **Processed Data:** first name, last name, email, order details and information about the type of payment instrument used to make the purchase. More generally, no new and specific provision of Personal Data is required, as the Data Controller will pursue this additional purpose by processing, where necessary, the Personal Data already collected.
3. **Legal basis:** legitimate interest in order to ensure the establishment, exercise or defense of a right of the Data Controller pursuant to Article 6(f) of the GDPR.
4. **Retention period:** two years following the collection of the data or for the duration of any judgment.
5. **Provision of personal data:** it is mandatory for the pursuit of the legitimate interests of the Data Controller indicated in the points above. Failure to provide it will result in the impossibility of carrying out the activities indicated above.

## 5. Social Network and social log in.

On our App you may also find social buttons /widgets, i.e. here buttons depicting the icons of social networks (e.g. Facebook, X, LinkedIn). These buttons allow users to interact with a click directly with the respective social networks, which then acquire data about your visit.

There is also a so-called social log in, which allows users to access their restricted area through the social network account. When the users proceed with the social log in, he/she agree to the terms of use and privacy policy of the social itself. We do not come into possession of your authentication information for these social networks.

## 6. Data provided by third parties.

Any Social User may post content that includes information about other Users, (as part of posts, comments and videos) as part of our Social Services and will assume any resulting liability.

## 7. Recipients and possible categories of recipients of personal data.

Personal data may be made accessible to, brought to the attention of, or communicated to the following parties, who are appointed by the Data Controller, as appropriate, as data processors or persons authorized to process data, or act as autonomous data controllers:

- employees and/or collaborators in any capacity of the Data Controller duly authorized and trained in accordance with the provisions of the GDPR;
- suppliers and partners of the Data Controller who provide services and all activities related to the Sites/Apps, IT service providers etc. appointed as data processors, through the signing of a contract;
- freelancers and consultants for the purposes of legal, financial and accounting management of the Data Controller's activities (such as accounting, administrative, legal operators etc.) and credit institutions and insurance companies, acting as autonomous data controllers;
- public authorities or police forces, in cases where access to the data is recognized by provisions of law, regulation or EU legislation.

#### **8. Transfer of data to countries outside the European Union:**

The recipients referred to in 6 above are established and process data within the European Union.

Personal data collected may be transferred outside the European Union. In this case, the Data Controller undertakes that the transfer will take place in compliance with the provisions of the EU Regulation 2016/679 ("GDPR"). In particular, data will be transferred only after signing Standard Contractual Clauses approved by the EU Commission with Decision No. 2021/914/EU or to countries able to guarantee an adequate level of protection of personal data and therefore recipients of an Adequacy Decision adopted by the EU Commission.

In this last regard, please note that the sites and app covered by this policy currently use analytics cookies from Google Ireland Ltd. Any data transfers to the United States enjoy the legal basis of Article 45 of the GDPR, an adequacy decision having entered into force in July 2023 with respect to the United States which provides for the possibility of transferring data to U.S. companies that have undergone the required certification mechanisms. Google holds all the required and necessary certifications in order to be able to carry out the data transfer in compliance with the applicable regulations. Lastly, it is specified, as further discussed below, that such cookies will be subject to consent by Users.

#### **10. Rights of the Interested Parties.**

The Interested Parties may exercise the rights that the Gdpr guarantees, as set forth in Articles 7, c. 3, and 15 et seq. by sending an e-mail to [privacy@ucapital24.com](mailto:privacy@ucapital24.com) , or, alternatively, a communication by registered letter with return receipt to the headquarters of UCapital24 at Via dei Piatti 11, 20123, Milan (MI).

The Data Subject may, in particular, exercise the following rights:

- **Right of access:** to obtain confirmation of the existence or otherwise of the processing of personal data concerning him/her and the purposes of such processing, to obtain copies of the data and information on: the origin of the data, the categories of data processed, the recipients of the data, the purposes of processing, the existence of automated decision making (including profiling), the period of data retention and the rights provided by the GDPR;
- **Right to obtain rectification** of inaccurate personal data and **supplementation** of incomplete personal data;
- **Right to obtain the deletion of personal data**, if any of the conditions set forth in Article 17 of the GDPR exist, in cases where the data were no longer necessary or the Data Controller no longer had the authorization to process them;
- **Right to obtain the limitation of the processing of personal data**, pursuant to Article 18 of the GDPR, in the following cases: 1. if the accuracy of the data is contested, for the time necessary to verify the accuracy of the data; 2. In the event that the data controller is no longer authorized to process the data, it is possible to request the restriction of the processing alternatively to deletion ; 3. If the data is no longer necessary for the data controller but is necessary for the data subject for the establishment, exercise or defense of a right in court;

- **Right to data portability**, if the conditions set forth in Article 20 of the GDPR are met, i.e., to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and to request its transmission to another data controller, if technically feasible;
- **Right to revoke consent** for processing based on it, without affecting the lawfulness of the processing based on the consent given before revocation. Consent can be revoked by writing an e-mail to [privacy@ucapital24.com](mailto:privacy@ucapital24.com).
- **Right to object to processing in pursuit of the legitimate interest of the Data Controller.** Each Data Subject has the right to object at any time to the processing of his or her personal data carried out in pursuit of a legitimate interest of the Data Controller. In the event of opposition, personal data will no longer be processed, unless there are legitimate grounds for processing that override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of a legal claim.

**Right to file a complaint with the Guarantor.**

Each Data Subject may lodge a complaint with the Guarantor for the Protection of Personal Data if he or she believes that his or her rights under the GDPR have been violated, in the manner indicated on the website of the Guarantor for the Protection of Personal Data.

**11. Changes to this policy**

This policy may be subject to updates or changes (including due to new legislation or regulations) for that reason Users are encouraged to check this document regularly. Substantive changes will in any case be highlighted through our services to give Users the opportunity to check the changes and, if they are not approved, possibly close their account.

**Last revision date: 16/01/2025**