



PRIVACY POLICY

Last Update: May 2020

U-Start S.r.l a socio unico (“**U-Start**” or “**we**”, “**us**”, “**our**”) commits to protect and respect your privacy and to provide you with all required information concerning the processing of personal data that we collect about you or that you provide us, in compliance with the relevant applicable data protection laws, both European and Italian.

First of all, to make this disclosure clearer, definitions of the key words contained in the Privacy Policy are provided below:

- Personal data: any information relating to a natural person who is identified or identifiable, including indirectly, by making reference to any other information, including a personal identification number or an online identifier;
- Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means (e.g. the collection, registration, storage, consultation, processing, modification, use and disclosure of information);
- Controller: natural person or legal entity, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data (in this case, U-Start);
- Processor: natural person, legal entity, public authority, agency or other body appointed by the controller to process personal data on behalf and in the interests of the controller;
- Data subject: the party to whom the personal data refers.

For the purposes of this Privacy Policy, the data controller is U-Start S.r.l. a socio unico, with legal offices in Italy, Corso Italia no. 22, 20122 Milano, C.F. e P. IVA n. 08556580960.

YOUR INFORMATION SUBJECT TO COLLECTION AND PROCESSING

1. Information that you provide to us directly

You may provide us with data about yourself such as your name and surname, email address, telephone number, professional information (i.e. if you are an investor or an entrepreneur) and any other personal information that you choose to share with us by filling out the fields on our website <https://www.u-start.biz/> (the “**Website**”) or by contacting us by telephone, email or in another manner.

When filling out the fields, you will be asked to provide your consent to the processing of your information for the purposes laid out in this Privacy Policy; however, if you communicate with us by telephone, email or in another manner, we will process the data that you voluntarily provide us only to give you a response to your request.

2. Navigation data

Every time you visit our Website the following data will be gathered automatically:

- technical information, including IP addresses or domain names used to connect to our Website, the type and version of the browser you are using, the time/zone settings, the type and version of browser plug-ins, the operating system and the platform you are using;
- information on your visit to our Website and online navigation records, including the entire URL, data on the series of clicks generated (clickstream), navigation dates and time; the resources requested and the size of the file obtained in response, the time and the status of the reply given by the server (successful, error, etc.), the methods used to exit webpage navigation.

Navigation information is not collected with the primary aim of identifying users, however due to its very nature it may allow for the identification of users.

COOKIES

Our Website uses cookies to distinguish you from other users of our Website. This enables us to ensure that you have a good experience as you navigate on our Website and to improve it. For detailed information on the cookies we use and the reasons they are used, please refer to our cookie policy.

PURPOSES OF PROCESSING

Personal data will be processed for the following purposes:

- to satisfy the requests you submitted us by contacting by telephone, e-mail or another manner;
- to allow you to access your personal area;
- to send you newsletters and marketing notifications via email. This may include promotional materials about new services and special initiatives or events organized by U-Start that are similar to those you have already used or to those you have already expressed interest in. This processing activity is carry out in accordance with the legitimate interests of U-Start, if your data were provided during previous events or in the context of our services and you are therefore one of our clients. In any case, please be reminded that you may ask to stop receiving messages from our us at any time, by selecting the link available in every email (*Newsletter*) sent by U-Start, or by contacting us at the following e-mail address: privacy@u-start.biz;
- to send you marketing notifications via email which may also include services and special initiatives or events organized by U-Start that are different to the ones you have already used or you have already expressed interest in. Your consent is required for this data processing activity. If you do not consent to your data being processed for marketing purposes, this shall have no effect on your ability to proceed with the navigation on this Website. In any case, please be reminded that you may ask to stop receiving messages from our us at any time, by selecting the link available in every email (*Newsletter*) sent by U-Start, or by contacting us at the following e-mail address: privacy@u-start.biz;

- to ensure that our Website content is presented in the most effective manner for you and your devices, by continuously improving the navigation experience, design and layout of the Website, as well as web analytics tools;
- to administer our Website and for internal operations, including checking the proper functioning of the Website and resolving problems;
- to obtain anonymous statistical information on the use of the Website, data analyses, research and statistical purposes;
- to enable you to use some of our service's interactive functions (such as those with social networks), should you choose to do so;
- to guarantee our Website's security;
- to ascertain liability in the case of any cybercrimes to the detriment of our Website.

PROVISION OF INFORMATION AND REFUSAL OF PROCESSING BY THE DATA SUBJECT

You are always free to decide whether to provide your personal data. However, any refusal to provide the information necessary for navigation purposes on our Website may make activities closely connected and instrumental to navigation impossible.

DATA PROCESSING AND RETENTION

The processing will be carried out using automated and manual means, with methods and tools meant to guarantee the utmost security and privacy, by parties made responsible for this in compliance with the provisions of the relevant applicable laws, both European and Italian.

Unless we need to exercise or to defend one of our rights, your data will be stored for the time strictly necessary for us to carry out the purposes they were collected for.

SHARING YOUR DATA

We may share your data with advisors, consultants or other professionals and service providers who collaborate with us in order to:

- provide services to U-Start such as: site management, managing marketing activities (*i.e.* Mailchimp), managing hardware and software, etc.);
- public and/or private individuals, natural and/or legal entities (legal, administrative, and tax consultancy firms, Chambers of Commerce, etc.), if providing this information is necessary or functional for correctly complying with the contractual obligations taken on, as well as with any obligations stipulated by law;
- allow you to interact with us and to access – through the personal area – all the information you may be interested in.

Such advisors, consultants and service providers will process your data, acting as autonomous controllers or as appointed processors, according to our instructions and for the sole purposes you provide us your data for.

We do not take information about you from public entities or private organisations. We may share anonymous information with third parties to provide additional information for analysis and statistics on the use of the Website for research purposes.



TRANSFER OF DATA OUTSIDE THE EEA

We may share your personal data with recipients located in countries outside the European Economic Area (“EEA”).

Any such transfer of your personal data will be carried out in compliance with applicable laws.

We will carry out all these international transfers in accordance with the mechanisms set out in Articles 44-50 of the Regulation 679/2016/EU (the “GDPR”), subject to appropriate or suitable safeguards as required by the GDPR or other relevant laws.

RIGHTS OF THE DATA SUBJECT

In accordance with the provisions of GDPR and other applicable legislation of data protection, you have the following rights:

- To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To rectify: where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To erase: you can require the deletion of your personal data, to the extent permitted by Article 17 of GDPR.
- To restrict: you can request the restriction of the processing of your personal data, to the extent permitted by Article 18 of GDPR.
- To object: you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- To data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

You may exercise your rights by contacting us at the following e-mail address: privacy@u-start.biz.

If you decide to contact us for these purposes, please provide your email address, name, address and/or telephone numbers in order to allow for the proper management of the request.

AMENDMENTS TO THE PRIVACY POLICY

We reserve the right to update and/or modify this Privacy Policy at any time. As the data subject of the data processing, you are required to periodically check for any changes. In order to facilitate this verification, the most recent date of updating will be specified on the Privacy Policy.

SOCIAL PLUG-INS AND RELATIONS WITH SOCIAL NETWORKS

Our web pages allow for interaction with social networks by means of sharing buttons and also may contain social network plug-ins (e.g., Facebook, Twitter, YouTube). If you access one of our web pages equipped with this type of plug-in, the web browser connects



directly to the servers of the social network and the plug-in is displayed on the screen thanks to the connection with the browser. If a data subject who uses a social network visits our web pages while connected to a social account, his or her personal information may be associated with the social account. The information will also be associated with the social account if the plug-in functions are used.

As regards the methods of privacy protection and the processing of the personal information collected by those social networks to allow for the above-mentioned interaction, please refer to the pages of the individual social networks. If the user of our Website does not want to associate the visit to our web pages with a social account, he or she must log off from the social network before visiting them.

Please take note that if a service for interaction with social networks is installed, it is possible that, even if you are not using the service, they may collect traffic data relating to the pages on which it is installed.

NOTICE

This Privacy Policy should not be considered valid for any other third-party websites that may be consulted via the links present on our Website.