#### Website Privacy Notice

Information on the processing of users' personal data pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR")

#### Why this notice

FairConnect S.p.A. (hereinafter "FairConnect" or the "Controller") is committed to respecting and protecting your privacy and wants you to feel safe while simply browsing the website. This page provides some information regarding the processing of personal data of users who visit or consult the website accessible at:

<u>https://www.fairconnect.life/it/, https://www.infomobility.it/</u>, and <u>https://www.gevolution.it/</u> (the latter are commercial names of FairConnect).

This policy applies only to the Controller's websites and not to other websites potentially accessed through links (for which users are referred to the respective privacy policies). Reproduction or use of the pages, materials, and information contained within the site, by any means or on any medium, is not permitted without the prior written consent of FairConnect. Copying and/or printing of site content is allowed only for personal and non-commercial use. For requests or clarifications, please contact the Controller at the contacts provided below. Other uses of content, services, and information on this site are not permitted.

FairConnect will make reasonable efforts to keep the site content up to date and reviewed, but makes no guarantees regarding the adequacy, accuracy, or completeness of the information provided, and expressly disclaims any liability for errors or omissions.

### **Source – Browsing Data**

FairConnect informs you that the personal data you provide and that are acquired when requesting information or making contact—via smartphone or any other internet-accessible device—as well as so-called "browsing" data, will be processed in accordance with applicable law. The IT systems and software procedures used for the functioning of this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of internet protocols. This information is not collected to be associated with identified individuals, but by its nature could, through processing and association with third-party data, allow users to be identified. This category includes IP addresses or domain names of the computers used by users who connect to the site, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server's response (success, error, etc.), and other parameters related to the user's operating system and IT environment.

This data is used solely to obtain anonymous statistical information on the use of the website and to ensure its proper functioning. Such data may also be used to determine liability in case of cybercrimes against the Controller's sites or related sites.

# Source - Data Provided by the User

FairConnect collects, stores, and processes your personal data in order to provide the requested information about the company's products and services.

The optional, explicit, and voluntary sending of emails to the addresses indicated in the appropriate sections of the websites, as well as communication via social networks, call centers, etc., involves the subsequent acquisition of some of your personal data, which is necessary to respond to your requests.

# Mailing List or Newsletter

Where active, these services allow the management of a contact database (email, phone, or other contacts) used to communicate with users/customers. They may also collect data on when messages are viewed and how users interact with them (e.g., link clicks). This information is used to assess user interest and improve the quality of communications, tailoring them to the user's needs.

# Purpose of Processing, Legal Basis, and Nature of Provision

Data is processed for the following purposes:

- 1. Strictly related and necessary to manage contact or information requests.
- 2. To fulfill pre-contractual and contractual obligations, including customer management during sales and post-sales support.
- 3. To manage job applications submitted via the dedicated section (applicants receive specific privacy information).
- 4. To comply with legal obligations.

Providing data for purposes 1), 2), and 3) is necessary; otherwise, the requested information cannot be provided.

For point 4), the legal basis is a legal requirement; for 1)–3), it is the (pre-)contractual relationship.

FairConnect may send commercial communications regarding similar products/services, as per Directive 2002/58/EC, using the email provided unless you object using the contact details provided below.

### Processing Methods, Logic, Retention, and Security Measures

Processing is carried out with electronic or automated tools by FairConnect and/or third parties it uses to store, manage, and transmit data. Data is processed and organized securely and confidentially, also with respect to logs from access to and use of web-based services and products. Personal data is retained for the time required by law, and in any case no more than 30 days.

Pursuant to Article 33 of the GDPR, users are invited to report any potential "personal data breaches" to FairConnect at privacy@fairconnect.it or via Customer Service, so that appropriate countermeasures can be taken.

# Cookies

A cookie is a small text file sent to your browser and possibly stored on your device (computer, smartphone, tablet, etc.). This typically happens when you visit a website. FairConnect only uses technical and analytical cookies to offer a secure and fast digital experience. Cookies do not retrieve data from your hard drive, transmit viruses, or identify your email address. Each cookie is unique to your browser/device.

Cookies help improve site functionality and user experience. Analytical cookies, for example, tell us which pages are most/least visited, how long users stay, and how they arrive at the site. FairConnect uses Matomo (<u>https://matomo.org/</u>) to collect, aggregate, and analyze anonymized usage data.

These cookies do not require consent under the Italian Data Protection Authority's May 2014 decision (updated in 2021).

If desired, users can disable cookies via browser settings or by using the Google opt-out addon: <u>https://tools.google.com/dlpage/gaoptout</u>

Since each browser is different from another, it is advisable to check the guide of the specific browser for the procedures to change the preferences relating to cookies. It is possible to set your browser to refuse all cookies or to exclude only some. The following links provide information on how to set preferences on the most commonly used browsers:

Internet Explorer

**Firefox** 

<u>Safari</u>

<u>Chrome</u>

# **Social Network and External Platform Interactions**

The site may interact with social platforms via widgets and buttons. The acquired data depends on each user's settings on the respective platforms. Buttons like LinkedIn's "Recommend" may collect user data. FairConnect does not control these data processes and provides them solely as an added feature.

FairConnect has no control over this process and provides it solely as a service. We use "Google reCAPTCHA" (hereinafter "reCAPTCHA") on our website, a service provided by Google, used to check whether the data entered, for example in information request forms or when entering data for sending an application, has been entered by a human or by an automated program. In order to do this, reCAPTCHA analyzes the behavior of the User of the Site based on various characteristics and different information such as the IP address, the User's stay on the Site or even the mouse movements made. This analysis starts automatically as soon as you access the website. reCAPTCHA analyses take place completely in the background and the User may not be aware that such an analysis is taking place. The data for carrying out the analysis are collected directly by Google. This data processing is primarily based on FairConnect's legitimate interest in protecting our site from abusive automated scanning and spam. For more information on Google reCAPTCHA and Google's policy, visit the following links: <u>Google Privacy Policy</u>, reCAPTCHA

### **Data Disclosure and Transfer**

To fulfill the above purposes, FairConnect may share personal data—both within and outside Italy-with third-party service providers. Only the necessary data will be shared, and adequate security measures will be taken. Data may be transferred outside the EEA if necessary for managing your contractual relationship or delivering requested services. FairConnect, as part of a corporate group based in Switzerland, may transfer data to the parent company under the EU adequacy decIn order to pursue the purposes indicated above, FairConnect may communicate and have the personal data of users/customers processed, in Italy and abroad, by third parties with whom we have relationships, where these third parties provide services at our request. We will provide these third parties only with the information necessary to perform the requested services, taking all measures to protect your personal data. The data may be transferred outside the European Economic Area if this is necessary for the management of your contractual relationship or to provide a service requested by the User. In this case, the recipients of the data will be imposed protection and security obligations equivalent to those guaranteed by the Data Controller and in any case in compliance with the provisions of Title V of the GDPR (for information on any transfer outside the EU, use the contact details below). FairConnect, part of a corporate group based in Switzerland, may, for organizational and administrative-accounting needs, transfer the data to the Group Head Company without further obligations in view of the declared condition of "adequacy" of the destination country formulated by the European Commission. In the event of use of services offered directly by Partners, we will provide only the data strictly necessary for their performance. Furthermore, personal data may be communicated to the competent public bodies and authorities for compliance with regulatory obligations or to ascertain responsibility in the event of computer crimes against the sites, as well as communicated to, or allocated to, third parties (as Data Processors or, in the case of providers of electronic communication services, as independent Data Controllers), who provide IT and telematic services (e.g. hosting, website management and development services) that WeCover uses to carry out tasks and activities of a technical and organizational nature that are instrumental to the functioning of the website. The subjects belonging to the categories listed above operate as separate Data Controllers or as Data Processors appointed for this purpose by FairConnect pursuant to art. 28 of the GDPR.

Personal data may also be processed by FairConnect employees/consultants who, authorized to process, are specifically trained and appointed as Data Processors pursuant to art. 29 of the GDPR and art. 2 *quaterdecies* of Legislative Decree 196/03.

# Data Subjects' Rights

Data subjects have the rights set out in Articles 15–21 GDPR, including:

- Withdraw consent
- Rectification or update
- Anonymization
- Restriction or objection to processing
- Portability
- Deletion
- Information on international transfers

These rights apply unless processing is required by law. No automated decision-making or profiling is carried out. You may file a complaint with the Supervisory Authority under Article 77 GDPR.

# **Data Controller and Data Protection Officer**

The Controller is FairConnect S.p.A.

Address: Via Galileo Galilei, snc – 64100 Teramo (TE), Italy

Email: privacy@fairconnect.it

The Data Protection Officer can be contacted at the contact details below.

The above rights may be exercised upon request of the interested party using the methods disclosed on the Company's website or by using the following references: FairConnect, Ref. DPO-Privacy- Via Galileo Galilei, snc 64100 Teramo (TE) Italy e-mail: privacy@fairconnect.it.

Use of the site, including on tablets and smartphones, implies full knowledge and acceptance of this policy at the time of access. FairConnect may update this notice without prior notice and recommends periodic review.

#### This privacy notice was last updated in July 2025.