

PRIVACY POLICY OF TRUSTFULL

Privacy Notice in Detail

1. What is a privacy policy?

This privacy policy ("**Privacy Policy**" or "**Privacy Notice**") describes how the website ("**Site**") of Fido S.p.A. ("**Fido**", "**We**", "**Company**", "**Controller**") manages the processing of personal data of users who consult our web page and who avail themselves of Fido's services using the Company's digital credit & risk scoring platform ("**Platform**").

This information is provided only for the Site and the Fido platform and not for other websites that the user may consult through external links or platforms that provide a service similar to Fido. Following consultation of this Site and use of the Fido platform, personal data relating to identified or identifiable persons ("**Data**") may be processed. This Privacy Policy is made in compliance with the legislation on the protection of individuals with regard to the processing of Personal Data set out in Regulation (EU) 2016/679 ("**Regulation**" or "**GDPR**"), as well as Directive 2002/58/EC ("**ePrivacy Directive**").

2. Who is the Data Controller?

The data controller is Fido S.p.A. with its legal headquarters in Via Meravigli No 16, 20123 - Milan (MI).

3. What kind of personal data do we collect?

Through the Website and the Platform, we collect and process Personal Data in different ways:

- **Personal Information Voluntarily Provided by the User:** We collect personal information about the User when the User actively provides it, such as when the User logs in to the Website and accesses the Platform and Fido's services, when the User writes to us for information about activities and packages offered by Fido, and/or when the User sends an email to book a Demo..
- **Personal data collected through the use of the Website:** we automatically collect certain personal information during the navigation and use of our Website and Platform by the user.
- **Personal data collected through the Platform:** access logs.

3.1. What type of Personal Data do we process?

- **Contact and Profile Information:** Personal information, such as the first and last name of the user and email address, when the user logs in to our Site, when he/she uses the Platform, books a Demo, submits an inquiry using Fido's contact information and/or subscribes to our mailing list;
- **Location data:** we may approximate the location of the user based on his/her IP Address.

3.2. Information collected by default

When the user use our Website and/or Platform or otherwise interact with us through a computer or mobile device, we and our third-party partners may automatically collect information about how the user accesses and uses the Website and Platform, as well as information about the device the user

uses to access the Website and Platform. We use this information to improve and personalize users' experience, to monitor and improve our Website, and for other internal purposes. We generally collect this information through a variety of tracking technologies, including cookies, location identification technologies, and similar technologies (collectively, "**Tracking Technologies**"). The user can accept and reject these technologies by changing his/her privacy preference settings in the browser profile settings. The information we collect automatically may be combined with other personal information we collect directly from users. The user can agree to and refuse these technologies by changing privacy preferences settings in the browser's profile settings.

The information we automatically collect may be combined with other personal information we collect directly from users.

The information we may collect automatically are:

- **information related to the website use** (e.g. which website the user comes from, how many times he clicked on an object);
- **personal data has relating to your interactions with our marketing communications** (e.g., whether or not you open it, whether or not you click);
- **information on devices used to access and interact with the website or the Platform** (e.g., this allows us to know if you use a computer, a tablet or a smartphone, the screen resolution, the operating system, the Wi-Fi connection, the Internet browser and the IP address, information on the server log files);
- **analytical information:** we may collect analytical data, or use third party analysis tools, to help us to measure traffic and website use trends, and to better understand the demographic characteristics and behaviors of our users.

4. What personal data we do not collect?

We do not collect or process the following personal information about our users:

- racial or ethnic origin;
- political opinions;
- religion or philosophical beliefs;
- health or medical conditions;
- criminal background;
- union membership;
- genetic or biometric data;
- life or sexual orientation.

Please do not send us, or disclose, any of the above personal information through the Site or directly to our contacts.

We also remind our users that we do not process Personal Data of minors.

5. Why do we process User Personal Data?

Personal data are processed for:

- a. Providing log in access to the Fido Platform**

In order to allow the user to use the Platform by logging in from the Site.

For the purpose of granting access to our services, we ask the user to enter the following Personal Data:

- User name (email address);
- Access password.

For a higher level of security, Fido requires its users to select “strong” passwords, i.e. passwords with at least 8 characters, alphanumeric and with upper and lower case letters.

Legal basis of processing: the access to the Platform and to Fido services and the fulfilment of contractual obligations towards the user.

b. Booking a Demo of the Fido Platform

To allow the user to request a Demo and to receive a preview of how the Overdraft Facility works. In order to contact the user, we may ask him/her to provide us with the e-mail address.

Through the Fido Website, the user can book a Demo for the following services/packages:

- Starter (up to 200 scores per month, widget without code, standard score, API integration and email support);
- Standard (up to 500 scores per month, widget without code, standard score, API integration and email support);
- Enterprise (more than 1,000 scores per month, widget without code, custom scoring, API integration, email/phone support, billing, account manager).

Legal basis of processing: pre-contractual negotiations with the user for the subscription of the service corresponding to the needs of the data subject.

c. Answering questions and processing user requests

To answer any inquiries, complaints, and suggestions regarding our Website, our Platform, our Dashboard and all our services, which the user submits using the contact details provided by Fido on the Website or via the “Ask a Question” button. We may use our Chatbot system to respond in a timely manner to your inquiries about Fido and its services.

Legal basis of the processing: our legitimate interests in managing, in an appropriate and timely manner, users' requests, complaints and recommendations regarding the Site and the Platform. In the event that the user sends us requests for quotations for personalized services, for information on overdraft facilities and/or for Starter, Standard and Enterprise packages we will use information and personal data of the user to fulfill our pre-contractual obligations.

d. Ensuring the technical operation of the Site and the Platform

We collect and use your Personal Data to technically administer the Site and the Platform and to ensure that they function properly.

Legal basis of processing: our legitimate interests in ensuring the proper functioning of the Site and the Platform from a technical/IT point of view.

e. Informing users about changes to the terms and conditions of the website and providing this Privacy Policy

In order to send information about changes to the terms and conditions of the website and provide this Privacy Policy.

Legal basis of the processing: our legitimate interest in informing the user in advance of these changes.

f. Compliance with legal obligations

In order to comply with our legal obligations, orders from government authorities which may also include measures from government authorities outside your country, if we reasonably believe we are required to do so and if the disclosure of user's personal data is strictly necessary to comply with such legal obligations or government orders.

Legal basis for processing: compliance with our legal obligations.

g. Marketing communications

To submit or to allow our IT service providers to submit our email marketing communications to Fido users. Marketing communications inform the user exclusively about products, services and new activities promoted by Fido.

Legal basis of the processing: the prior explicit consent of our users.

Please note that users can always opt out of receiving marketing communications even if they have already given their consent, simply by unsubscribing from the newsletter service or by notifying us by email.

If the user is already a customer of Fido, if the user has already taken advantage of our Starter package or has already purchased a different solution, we may contact him via e-mail to provide information about services similar to those already mentioned and to keep him updated on the latest news promoted by the Company.

Legal basis of the processing: our legitimate interest in directly promoting Fido's activities and services to our users.

Users have the option to opt out of this specific direct marketing processing at any time by sending an email and/or using the contact information listed in this Privacy Policy.

h. Data analysis to obtain trends and improve the Site and the Fido Platform

We collect Personal Data from users to carry out analyses on trends and consumption patterns. This helps us to know better the users of the Site and our customers on the Platform and allows us to adapt our Site and Platform to the preferences identified by the users and, more generally, to the services.

Legal basis of the processing: by staying and browsing on our Website, the user allows us to get to know him/her better, to improve our offer and to make his/her experience more immediate and easier.

i. Fraud and abuse protection

We will use information about fraudulent or criminal activities related to the use of our services for the purpose of detecting and preventing any fraud or abuse.

Legal basis of the processing: our legitimate interests in protecting our organization from fraudulent activities.

j. Protection of our legal interests

In order to enforce, in accordance with applicable law, our contractual terms and conditions, to protect our business operations, to protect our rights, privacy, safety or property, and to enable us to pursue available legal remedies or limit any damages that may be awarded against us.

Legal basis of the processing: our legitimate interests in protecting our organization, in accordance with current regulatory requirements.

6. Who are the Users' Personal Data disclosed to?

The Personal Data of users of the Site and of those who use our Platform may be communicated to our staff, for the purposes of providing the service and responding to requests received from users.

The newsletter is sent via e-mail to those who explicitly consent to its processing for marketing purposes, authorizing Fido to process their Personal Data. Exclusively for this service, we may use external companies that carry out the activities of commercial communication and sending newsletters.

These companies may also be based out of Europe. In any case, we assure our users that our business partners will not directly use or sell your Personal Data to third parties. By subscribing to the Services on the Site and the Platform, users acknowledge that they allow Fido, through the analysis of the Data made by the service provider, to come into possession of the following information:

- the amount of times the newsletter email is opened;
- number of clicks on links contained in the newsletters;
- no email opening related to the newsletter;
- bounce email related to the newsletter on another email;
- un-subscription;
- complaints;
- possible use of the newsletter through social media;
- number and value of individual user purchases.

7. What are the user's rights in relation to the processing of Personal Data and how can they be exercised?

Data subjects have the right at any time to obtain confirmation of the existence of personal data and to be informed about the content and origin of such data, to verify its accuracy or to request its integration, updating or rectification (Articles 15 and 16 of the Regulation), and in particular:

- **Right to access.** The right to obtain access to personal data as well as to certain related information.

- **Right to data portability.** The right to receive personal data in a common format and to have it transferred to another data controller.
- **Right of rectification.** The right to obtain rectification of personal data without undue delay if personal data are inaccurate or incomplete.

Pursuant to articles 17, 18 and 21 of the Regulation, users have the right to request the erasure, limitation of the processing, anonymization or blocking of data processed in breach of the law, as well as to oppose in any case, for legitimate reasons, their processing, and in particular:

- **Right to erasure.** The right to obtain the erasure of your personal data without undue delay in certain circumstances, such as when personal data are no longer necessary in relation to the purposes for which they were collected or processed.
- **Right to restriction of processing.** The right to obtain, in specific circumstances identified by the applicable law, a limitation for data processing for a certain period of time, for example when you contest the accuracy of personal data, as long as to verify the accuracy of such data.
- **Right to object.** The right to object, on grounds relating to your particular situation, to the processing of your personal data, and to object to the processing of your personal data for direct marketing purposes, insofar as this is related to such direct marketing.

Please note that the above mentioned rights, in some cases, are subject by law to certain conditions. For this reason, in the event that the user submits a specific request to us regarding the exercise of one or more of his/her rights, we will take the necessary time to evaluate the content of the request. The deadline for responding to the Data Subject is thirty days, extendable up to three months in cases of particular complexity. In this case, we will provide at least one interlocutory communication to the data subject within the thirty-day period.

The exercise of rights is, in principle, free of charge. However, Fido reserves the right to request a fee in the event of manifestly unfounded or excessive requests (including repetitive requests), also in light of any indications that may be provided by the Data Protection Authority.

Rights can be exercised by contacting the Data Controller and/or the Data Protection Officer at the following addresses:

- e-mail: privacy@trustfull.com
- to Fido S.p.A. legal headquarters - via Meravigli n. 16, 20123, Milan (MI).

8. How long do we store personal Data?

We will retain the User's Personal Data for as long as he or she has not requested deletion. Fido undertakes, in accordance with the terms of service indicated on our Website, to store the Data you have entered and to make it available to you for processing through the tools offered by our services.

9. What kind of data transfers can we carry out?

For some of the processing operations mentioned above, we may use business partners, suppliers and distributors located outside the European Union. In these circumstances, we assure our users that data transfers outside the EU will be carried out in accordance with applicable law and, where

necessary, by entering into agreements that provide an adequate level of protection and/or by adopting the standard contractual clauses required by the European Commission.

10. How do we protect personal Data?

Whatever the user decides to use our services, whether he/she creates a profile or uses our Platform and/or Dashboard, Fido cares about the security of User Data and therefore takes appropriate technical and organizational security measures to protect the Personal Data collected.

We are committed to processing your Data as minimally and as intrusively as possible, using the following security measures:

- the Transport Layer Security ("TLS") encryption system, allows us to protect the user's personal information and to ensure a certain level of security when the user uses our services.
- The passwords we ask to our users to enter when they log in are required to access the account and help us protect information on the Site and Platform. Therefore, we ask the users to enter "strong" passwords with 8 characters, alphanumeric and with upper and lower case letters.
- Standardization. Standardization comes in two forms, ensuring general formatting standards and canonizing Data. First, Fido capitalizes all Data and removes leading and trailing whitespace. It ensures normalization across all of our Data sources, as raw Data comes in a variety of capitalization models. We also remove any leading or trailing punctuation that we have deemed non-essential.

We take all measures we deem necessary to protect our Users' Data from unauthorized access. We attempt to protect our Users' Information in accordance with regulatory requirements. However, no security system is unfailing and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised due to a breach of our systems, we will take reasonable steps to investigate the incident and, where appropriate, notify affected users of the breach.

11. Un-subscribing services

To opt-out the newsletter or to unsubscribe from the website, the user must send us an e-mail to: support@trustfull.com.

12. Applicable law

This Privacy Policy is regulated by and shall be construed in accordance with the laws and any other mandatory provisions applicable in the European Union.

13. Complaint to the Data Protection Authority

The data subject may lodge a complaint with the Data Protection Authority, available at the following website <https://www.garanteprivacy.it/>.

Tab 1 - THIRD PARTY TRACKING TECHNOLOGIES

We will strive to update this list if or when we work with new partners offering choice on the collection of your information, but as partners change and new technologies become available, it is possible that this list will change over time and may not always reflect our current partners.

Third parties partners	Partner product	Type of tracking technology	Description
Google	Google AdWords Conversion; Google Shopping Reviews	Advertising; Customer Interaction	Google AdWords Conversion allows us to see what happens after a customer interacts with our ads - for example if they have bought a product, subscribed to a newsletter or completed other actions on our website.
Google	Google Dynamic Remarketing	Advertising	Dynamic remarketing campaigns are used to show previous visitors ads for goods or services they have seen on our website.
Facebook	Facebook Impressions	Advertising	Facebook Impressions is used to measure the time spent in ads on the screen.
Google	Google Tag Manager	Essential	Google Tag Manager is used to monitor website analysis.
Google	Analytics	Analytics	Google Analytics makes it possible to analyze detailed statistics on visitors to a website such as session duration, origin of the visit, number of pages visited, most viewed pages, geographical location.
Facebook	Facebook Custom Audience; Facebook for Developers	Advertising and social media	Used to re-target visitors on all their devices; monitor displayed/selected advertisements; allow Facebook members to log in with their Facebook profile; and, while connecting, allow users to connect with friends via these media and post information and updates to their Facebook profile.
LinkedIn	LinkedIn	Third party cookie	Some of our pages use LinkedIn widgets. Any data processing is governed by LinkedIn's privacy policy, to which you are referred.

PRIVACY ABSTRACT FOR OVERDRAFT CUSTOMERS RELATED TO Fido JS FUNCTIONING

Through Fido Javascript SDK ("**Fido JS**" or "**Widget**") located on the page of the website where the user registration form is available, the Data Controller analyzes the information content of the so-called digital footprints of users who register on the site in order to predict the credit risk, through an algorithm that allows to collect information on users on the Internet to assess the quality and reliability for the purpose of assessing creditworthiness.

WHAT TYPE OF PERSONAL DATA DOES Fido JS COLLECT?

By means of Fido JS, the Data Controller acquires Personal Data as part of its normal operation, the transmission of which is an integral part of Internet communication protocols. Among this Data, Fido analyzes the type of device (e.g., tablet/mobile), the operating system (e.g., iOS/Android), the channel through which a user reaches the Controller's website (e.g., paid/organic search), the time of day of the request (e.g., morning/night), the email service provider (e.g., gmail/Yahoo), and other information that may contain the user's Personal Data (e.g., we can trace the personal email address that may contain the user's first and last name).

A complete list of the information associated with the so-called digital footprint and processed by the Controller through Fido JS is available at <https://docs.trustfull.com/docs/>.

The processing of personal data by Fido JS is carried out by Fido S.p.A. with legal headquarters in Via Meravigli n. 16, Milan (MI), 20123, with whom the Data Controller has signed a specific agreement for the processing of personal data pursuant to art. 28 GDPR.

COOKIE POLICY OF Fido

1. Preamble

The Cookie Policy of Fido S.p.A. ("**Cookie Policy**") describes the different types of cookies that are used on the Fido website ("**Site**") and platform ("**Platform**"), which the user can access.

Fido S.p.A. ("**Fido**", "**We**", "**Company**" and "**Data Controller**") is the Data Controller and it determines the purposes and means of the processing of personal data pursuant to Regulation (EU) 2016/679 ("**Regulation**" or "**GDPR**") and Directive 2002/58/EC ("**ePrivacy Directive**").

What are cookies?

Cookies are small text files that may be used by websites to make the experience more efficient for you.

Cookies allow us to store small amounts of information on your computer or mobile application about your visits to our Site.

Why are we using cookies?

We use cookies for several purposes. Necessary cookies are used in order to ensure the proper functioning of the Site and our Platform.

We may also collect information about your use of the Site anonymously such as: pages visited, time spent, traffic origins, geographic origin, age, gender and interests for the purpose of marketing campaigns. These cookies are sent from third party domains external to our Site.

We may personalize content and ads through the Site and our Platform to provide social media features.

How do we use cookies?

We may store cookies on your device if they are strictly necessary for the operation of this Site and the Platform. For all other types of cookies we require your consent.

What types of cookies do we use?

This Site uses different types of cookies. Some cookies are placed by third-party services that appear on our pages.

At any time, you can change the cookie settings in your browser that allow you to use all features without restrictions when browsing our Site or using our Platform. We invite users to read our Privacy Policy located on our Website and which contains all the information about who we are, how we process Personal Data and how the user can contact us.

Please find below the types of cookies we use when you browse our Site.

- **Necessary cookies**

Necessary cookies are used to make the Site and Platform usable by enabling basic functions such as browsing the page and accessing secure areas. The Site and Platform cannot work properly without these cookies.

- **Preference cookies**

Preference cookies allow the Site and the Platform to remember information that affects the way the Site and the Platform behaves or looks, such as your preferred language or location.

- **Statistical cookies**

Statistical cookies help us to understand how visitors interact with us by collecting and transmitting information anonymously.

- **Marketing cookies**

Marketing cookies are used to track visitors to the Site and users of the Platform. The purpose is to display ads that are relevant and engaging to the individual user and therefore those of greatest value to third-party publishers and advertisers.

- **Unclassified Cookies**

Unclassified cookies are cookies that are in the process of being classified, along with individual cookie providers.