Uipple - Privacy Policy

We are committed to respect, integrity, security and confidentiality in our business relationships. We apply these principals to our treatment of personal data that is in our care. We are committed to protecting your right to privacy.

This document will explain how and why Uipple collects and uses personal data. Personal data is any information that can be related to an individual person whether they are directly, or indirectly, identified.

In this document, we refer to Uipple and its affiliates as "Uipple," "we," or "us," we refer to our websites and online services as "the Sites," and we refer to this document as "this Privacy Policy."

We want you to understand exactly what you are agreeing to by accepting this Privacy Policy. If you have any questions, or if you wish to exercise your data protection rights, you can write to us by email at privacy@uipple.com, or you can contact us at by mail, at the address below.

Uipple

Via Antonio de Curtis, 20 80018, Mugnano di Napoli, NA

Attn.: Data Protection & Privacy

1. What personal data does Uipple collect, and how?

1.1 Data we collect directly from you

We may collect personal information directly from you under the following circumstances.

- > When you compile forms on our website or on our social media channels.
- > When you sign up for an account to use our services, and when you use that account to access our services.
- > When you participate in a survey or questionnaire.
- > When you chose to give us information in other ways, including when you contact us by email, by telephone, by mail, on social media, or in person (for example, if you give us your business card or contact information).

Depending on how you are interacting with us, we may collect some or all of the following personal data directly from you. We will request this data from you in a clear and unambiguous way.

Contact information

This can include your name, email address, mailing address, business address, and phone number.

Professional and business details

This can include your role, employer, business concerns and specific needs, and professional interests.

Identification and credentials

This can include, for example, a username and password associated with an account that you have with us. We collect this information to enable authentication on the Sites and to protect your privacy and confidentiality when we need to confirm your identity.

If necessary, we may collect additional personal information from you. For example, we may ask for additional information to provide a service that you are obtaining from us, for recruitment and job applications, to fulfill legal obligations, or if you are responding to a survey or questionnaire.

1.2 Data required to process payments

If you make purchases from us on the Sites, the personal information required for your payment, including the details of your payment instrument, is processed by a third-party service provider, Stripe. Please refer to their privacy and security policies.

1.3 Data collected automatically when you use the Sites

When you use the Sites, we automatically collect data regarding your usage.

Browser and device data

This can include your IP address and the <u>user agent string from your browser</u>. The latter generally contains the name of your operating system, the manufacturer and model of your device, and your browser type and version.

Data regarding how you use the Sites

This can include pages you visited on the Sites, the time you spent on each page, any links or buttons you clicked, and the URL of a page that led you to, or referred you to, the Sites.

Data from tracking technologies

When you use the Sites, we obtain data from third-party tracking technologies that use cookies, web beacons, tags and similar instruments.

Please refer to our Cookie Policy for more information, and for instructions on how to opt out of this kind of tracking.

We use the following technologies that use cookies and other tracking technologies: Google Tag Manager, Google Ads and Google Analytics, Facebook Pixel, LinkedIn Insights and Twitter Conversion Tracking.

If you are concerned about the privacy of your browsing online and want to learn more about how and why many organizations can, and do, use cookies and other technologies to track your activity across websites <u>you can refer to this accessible</u> explanation.

1.5 Other data we collect when you interact with us

We collect the following data when you interact with Uipple, either via the Sites, or by other means including in person, by email, by phone, on social media etc.

- > The communication channel you used to interact with us.
- > The date and time that the interaction occurred.
- > Your preferred language for communicating with us.

1.6 Personal data from other sources

In the course of our business activities including interactions with clients and the provision and development of our tools and services, we may collect and process data from third parties, including open data, that can contain personal information.

We always take reasonable steps to ensure that a third-party from whom we are obtaining data is complying with applicable law, is complying with the terms of any agreement they may have with you, and that they have clearly informed you about their data collection, processing, and disclosure.

We only collect personal information from third parties if it is truly necessary and we have a valid legal basis for collecting the information.

1.7 We centralize our data collection

We associate all the data that you provide to us with all the data that we collect from you automatically.

2. Why we process personal data.

See <u>Your data protection rights</u>. for more information regarding how you can exercise control over how we use or share your personal data.

We only collect, use, or share your personal data when we have a valid reason to do so.

This section includes the specific legal basis for our use, processing, and disclosure of personal data. The language below is that of the European Union's General Data Protection Regulation (GDPR), Article 6, Section1.

"Processing personal data" means collecting, using, or sharing personal data.

2.1 We process personal data to comply with legal and regulatory requirements.

We may be required to disclose data to public authorities, including in countries other than your own. This means that we may share your personal data with public authorities in a country other than your own, if we are required to do so.

2.2 We process personal data based on your consent.

We will always obtain your consent before collecting, using or sharing your data in a way that is not covered by this Privacy Policy.

2.3 We process personal data to ensure the performance of a contract that we have with you.

We collect, use and share your personal data to fulfill the obligations of our business relationship with you.

2.4 We personal data based on our legitimate business interests.

We only collect, use, or share personal data for our business operations when it is strictly necessary. These include the following.

- > To provide, develop, analyze and adapt our systems, our products, our consulting and training services, and the Sites. For example,
 - ° to adapt a training workshop or consulting effort to your needs and ensure that we serve you as best as possible.
 - when we are developing processes to anonymize data for further analysis
 - ° offering ongoing support and customer service to you.
- > To develop, analyze and adapt our business itself, including our business processes, our organizational structure, our strategy and value proposition, and our decision-making. For example,
 - ° if we are analyzing outcomes of a business relationship.
 - ° when we need to make business, decisions based on the geographic distribution and needs of clients and the audience of the Sites.
- > For recruitment. For example,
 - ° if you are applying for a job with us.
 - ° if we use a service provider or consultants for human resources.
- > To analyze, develop, and maintain business relationships. For example,
 - o to maintain a list of our past clients and contacts for normal business activity, to understand which clients or potential clients may be interested in our consulting services.
 - ° to provide you with our content if you have agreed to receive it.
- > To protect the security and integrity of our systems, of the Sites, of our organization, and of the data in our care. For example,
 - ° to enable automated systems monitoring and security audits.
 - to detect and prevent unauthorized access to your data.
- > To conduct our marketing activities. To promote and advertise Uipple. To promote and advertise our consulting and training services, our products, our brand, and the Sites. For example,
 - ° for targeted advertising based on your interests.
- > To communicate with you, according to the terms of our relationship.

2.5 We anonymize and aggregate personal data

We may analyze and process personal data in such a way that (1) the anonymization process cannot be reversed and (2) that it is impossible or extremely impractical to identify you from the anonymized data. We can use anonymized data for any purpose

within the bounds of applicable law. We often work with datasets from third parties, including open data that contain exclusively anonymized data.

3. When do we share personal data?

We do not share, sell or rent your personal data to unaffiliated third parties.

We may store or process your data internationally. For more information about international data transfers, see <u>International Data Transfers</u>.

3.1 We share personal data within Uipple

We may share personal data within our organization based on the reasons outlined above in Why we process personal data.

3.2 We share data to fulfill legal obligations and for compliance.

We share personal data with the relevant authorities to comply with local and international laws and to protect our legal rights. We share data to respond to requests from judicial authorities, regulatory agencies, or other public authorities. This means that we may share your personal information to public authorities and government bodies in a country other than your own.

3.3 We share personal data with our third-party service providers

We may share your personal data when we engage third-party service providers, including consultants. For example, cloud services including data storage, analytics, and hosting, email services, marketing services, human resources consultants.

We only work with trusted third parties and we take steps to ensure that any third party with whom we share data adopts suitable organizational and technical measures to ensure the security and integrity of that data. We also ensure that their systems, and our use of their systems, comply with applicable laws and respect your data protection rights.

3.4 We share personal data to prevent harm

We share personal data if we believe that it is necessary to protect your rights, your privacy, and your safety, and to protect the rights, privacy, and safety of any other person or persons, or Uipple.

3.5 We share data if there are changes to our business structure

We may share your information if we are involved in a transaction that can alter the structure of our business. This can include re-organizations, mergers, joint ventures, acquisitions, financing, changes of control, sales or transfers of assets, etc. This Privacy Policy will still apply to your data if this occurs.

For example, if another company acquires all or part of our business, they will be able to use your personal data within the bounds specified by this Privacy Policy. If

they wish to change how they use your personal data, they will need to enter into a new agreement with you.

4. International Data Transfers

We are building a global company, and we may store and process your personal data in a country other than your own.

Your personal data may be stored and processed in any country where we have operations, or in any country where we engage a service provider.

We will always take steps to ensure that these international data transfers comply with applicable laws, and we will always take steps to ensure that your rights are protected, and that your information is handled safely.

In particular, we apply legal mechanisms to protect your personal data. This can include,

- > ensuring that a European Commission "adequacy decision" applies to the data transfer. The European Commission maintains a list of countries whose laws provide sufficient personal data protection.
- > using the EU Standard Contractual Clauses, or
- > ensuring that service providers we use in the United States of America are certified by the <u>Privacy Shield framework</u>.

5. Security

Uipple protects your data by applying several technical, physical and operational security measures. If you believe that any data in our care has been compromised, please contact us immediately.

No entity can realistically guarantee the safety of data online or offline, and we are no exception. Despite our best efforts, we cannot guarantee that unauthorized persons will not access your data.

If we become aware of unauthorized access to data in our care, we will inform the relevant authorities, and you will be promptly informed alerted.

6. Retention

We only retain personal data for as long as necessary, or until you request that we delete it by exercising <u>Your data protection rights</u>.

We retain personal data for the duration of the relevant business relationship.

We retain personal data for as long as is required by our legal and regulatory obligations.

When we no longer require your personal data or you request its deletion it will only be retained for the reasonable processing time required to either delete it entirely from our system or anonymize it in such a way that (1) the anonymization process cannot be reversed, and (2) that it would be impossible or extremely impractical for you to be re-identified with the anonymized data.

7. Children

Uipple does not target children under the age of 16. We do not knowingly collect or in personal data from children under the age of 16.

Please contact us at <u>privacy@uipple.com</u> immediately if you become of aware of any data we may have collected from children under the age of 16.

If we learn that we have collected personal data from individuals under the age of 16, it will be deleted from our systems, as required by applicable laws.

8. Links to other websites or services

The Sites include links to third-party websites or services. We are not responsible for external websites or services and therefore we have no control over how these external websites or services collect, use, or share your personal data. This Privacy Policy does not apply to external websites and services.

9. Your data protection rights

The right to access – You have the right to request copies of your personal data.

The right to rectification – You have the right to request that Uipple correct any information we may have about you, that you believe to be inaccurate or incomplete.

The right to erasure – You have the right to request that Uipple erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Uipple restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Uipple's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Uipple transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you are located in the European Economic Area and some other jurisdiction, your data protection rights are protected by law. We have chosen to extend these rights to all individuals whose personal data is in our care, regardless of their location.

If you would like to exercise any of these data protection rights, please write to us at: privacy@uipple.com

10. Changes to our Privacy Policy

We will update this document with changes to our Privacy Policy. If we are implementing a major change to the way that we use personal data, we will notify you at least 30 days prior to the change coming into effect. You will be notified either by email, or via a prominent notice on the Sites.

11. How to contact us

If you have any questions about our privacy policy or how we process personal data, or to exercise your data protection rights you can contact us by email at

privacy@uipple.com

or you may reach us by post at

Uipple

Via Antonio de Curtis, 20 80018, Mugnano di Napoli, NA Italia

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