



PRIVACY POLICY AND COOKIE POLICY

The purpose of UCapital24 S.p.A. ("**UCapital24**", the "**Data Controller**", or "**we**") is to connect all economic and financial operators, both retail and institutional, acting as an "aggregator" between supply and demand and offering financial services and content through the homonymous web platform.

In this context, this Policy describes the procedures followed by UCapital24 with regard to the processing of personal data collected or processed via the website www.ucapital24.com (the "**Website**").

Unless otherwise specified, this Policy also constitutes the information notice – pursuant to articles 13 and 14 of Regulation (EU) no. 2016/679 (hereinafter the "**GDPR**") – provided to those who interact with the Website ("**Users**", "**Data subjects**", or "**you**"), including those who intend to create their personal profile and use the services of the Website, register and access the Financial and Economic Social Network, or purchase the other Premium services offered by UCapital24.

1. Data Controller. Data Processors.

The Data Controller is UCapital24 S.p.A., with registered office in Via Molino delle Armi no. 11, 20123, Milan (MI), Fiscal Code and VAT number 10144280962, e-mail: privacy@ucapital24.com.

The updated list of any data processors is available, upon request, at the registered office of the Data Controller.

2. Data protection officer.

The Data Controller has appointed a Data Protection Officer ("**DPO**"), pursuant to article 37 of the GDPR, who can be contacted for any information concerning the processing of personal data by writing to the following e-mail address: dpo@ucapital24.com.

3. Categories of personal data processed. Sources from which they originate.

Through the Website we may collect and process the following categories of data:

- common personal data, including data voluntarily provided by you for the creation of an account, such as personal and contact details (e.g. name, e-mail address and/or mobile phone number, password);
- navigation data;
- payment and billing data when purchasing paid services (such as premium services, if applicable);
- personal data contained in the User's personal profile (e.g. academic experience, employment history, skills, etc.).

Such data will normally be provided directly by the Users; some common data may also be collected by UCapital24 from third parties, such as business partners and brokers, as well as social network operators (e.g. Facebook, Twitter, LinkedIn) through which you can access the Website directly using your social account.

4. Purposes and legal basis of the processing. Legitimate interests pursued.

The personal data collected will be processed:

- a) to respond to requests for information made by Users;
- b) for activities related to the registration to the Website and the use of the relevant social network services, according to the terms and conditions governing access and use, and the settings selected by the User;

- c) for activities connected to the registration to specific pages or functionalities of the Website, and the use of the relevant services; the activities aimed at the purchase and use of Premium services or the participation in webinars or other training events organized by UCapital24 are included;
- d) to fulfil the legal obligations to which the Data Controller is subject (e.g. accounting, fiscal, administrative obligations);
- e) to send promotional communications regarding services similar to or connected with those already purchased or for which the User has registered (so-called “soft spam”);
- f) to send communications regarding the availability of our services, service messages on the use of services and security, legal notices;
- g) to establish, exercise or defend a legal claim of UCapital24 also in Court;
- h) for activities related to the operation and functionality of the Website.

The processing of data for the purposes set out under letters a), b) and c) does not require the consent of the Data Subject as it is necessary to fulfil specific requests made by the Data Subject to UCapital24, or to perform a contract to which the Data Subject is a party pursuant to article 6, paragraph 1, letter b) of the GDPR (with particular reference to the Terms and Conditions of Service and the General Conditions of Sale).

The processing of data for the purpose set out under letter d) does not require the consent of the Data Subject as it is necessary to fulfil the legal obligations to which the Data Controller is subject pursuant to article 6, paragraph 1, letter c) of the GDPR.

The processing of data for the purposes indicated under letters e), f), g), h) does not require the consent of the Data Subjects as it is necessary to pursue the legitimate interest of the Data Controller, pursuant to article 6, paragraph 1, letter f) of the GDPR.

In any case, UCapital24 provides you with the possibility to select your preferred settings on the personal information to be made available and how you interact with other Users, as well as the ability to activate push notifications or receive updates and information content via email depending on the service, in accordance with the Terms and Conditions of Service and the General Conditions of Sale.

5. Provision of data and consequences in case of failure to provide them.

The provision of personal data for the purposes set out under letters a), b), c), d) is optional, but necessary to manage and process the Users’ requests, as well as to fulfil the legal and contractual obligations of UCapital24. The provision of personal data for the purposes under letters e), f), g), h) is optional, but necessary for the pursuit of the legitimate interests of the Data Controller indicated under the previous section. In all the above-mentioned cases, failure to provide the data will make it impossible to respond to the User’s requests, establish contractual relations with the User and carry out the activities indicated above.

6. Recipients and possible categories of recipients of personal data.

Personal data may be made available or communicated to the following subjects, who will be appointed by UCapital24, as the case may be, as data processors or persons authorized to process them, or will act as autonomous data controllers:

- employees and/or collaborators in any capacity of the Data Controller;
- employees and/or collaborators in any capacity whatsoever of the companies of the group to which the Data Controller belongs;
- suppliers and partners of the Data Controller who provide the services and all activities related to the Website (such as brokers, real estate brokers, IT platform maintenance service providers, etc.);
- freelance professionals and consultants for the purposes of the financial and accounting management of the Data Controller’s activities (such as accounting and administrative operators, etc.);
- public authorities or police forces, in the cases provided for by law.

7. Data transfer to countries outside the European Union

In the event that the recipients referred to in the above section 6 are established or process data in a country outside the European Union, the transfer of data to such entities will be carried out, alternatively: i) in the context of an adequacy decision issued by the European Commission, pursuant to article 45 of the GDPR, which has verified that such third country, or specific sectors within the third country, provide an adequate level of protection of your rights; ii) pursuant to the execution of standard data protection clauses, approved by the European Commission, under article 46, paragraph 2 of the GDPR; iii) in the presence of binding corporate rules approved by the supervisory authority in accordance with Article 47 of GDPR.

In the absence of an adequacy decision or appropriate safeguards, the Data Controller will transfer personal data to a third country or an international organisation only if the transfer is necessary for the performance of a contract with the Data Subject or the implementation of pre-contractual measures taken at the Data Subject's request, or for the establishment, exercise or defence of legal claims, or, finally, if the Data Subject has explicitly consented to the envisaged data transfer, being informed of the relevant risks thereof.

8. Personal data retention period

Personal data relating to registered Users will be retained for a maximum period of 24 months from the closing of the account by the same Users; in case of purchase of paid services, the data will be retained for a maximum period of time equal to the limitations of rights enforceable by UCapital24, as applicable from time to time, generally equal to 10 years from the termination of the agreement.

9. Cookie

Cookies are small text files sent from the website the User visits to his/her computer, where they are stored and then resent to the website on the next visit. Cookies enable websites to operate properly and efficiently to improve the user's experience, allowing the site to store the information in the memory of one's own computer or other devices.

Cookies used in the Website, which also include third party cookies, can be divided into the following subcategories:

- navigation or session cookies, which ensure normal browsing and use of the website. Since these cookies are not stored in the User's computer, they expire when the browser session is closed;
- analytical cookies, such as, by way of example, those used by Google Analytics, which collect and analyse statistical information, through computers and other devices, about the number of users of the site, the number of clicks on the page during their navigation, or the site where users come from and the pages they have visited;
- social widgets and plugins: some widgets and plugins made available by social networks may use their own cookies to facilitate the interaction with the reference site;
- essential cookies, which allow the functioning of the Website itself and the use of the services requested by Users, as well as to navigate the Website using its best performance;
- profiling cookies, which collect information on your browsing habits in order to offer you advertising in line with your interests;
- performance and functionality cookies, which collect anonymous information on the pages visited by Users, are used to track the most searched pages, to improve links between pages and to determine the reason for possible error messages; they record the choices made by the User in order to improve navigation and your online experience.

Third party cookies installed on the website are listed below. For each of them there is the indication of the link to the relevant information notice on the processing of personal data carried out and on the methods to disable cookies used. As regards third party cookies, the Data Controller has the sole obligation to include in this policy the link to the third party website. Instead, the obligation to provide the information notice and to give indications on how to give consent and/or disable cookies lies with said third party.

Source	Cookie name domain	Cookie type	Cookie Policy
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turn	r.turn.com	Profiling	https://www.turn.com/trust/consumer-opt-out
Google Analytics	google-analytics.com	Statistics, Profiling	https://support.google.com/analytics/answer/6004245
Google Adwords	googleadservices	Statistics, Profiling	http://www.google.com/intl/it/policies/technologies/ads/
DoubleClick	doubleclick.net	Profiling	http://www.google.com/intl/it/policies/technologies/ads/
Criteo	criteo.com	Profiling	http://www.criteo.com/it/privacy/
Zanox	zanox.com	Profiling	http://www.zanox.com/it/riguardo-a-zanox/privacy_policy/
Facebook	facebook.com	Profiling	https://www.facebook.com/about/privacy/cookies
Amazon	Amazon-adsystem.com	Profiling	http://www.amazon.it/gp/dra/info
Adobe Target/Test&Target	adobetag.com	Profiling	http://www.adobe.com/privacy/opt-out.html
juiceadv	juiceadv.com	Third party cookies	https://juiceadv.com/privacy.asp
Sojern	sojern.com	Profiling	http://www.sojern.com/privacy-policy/
Xaxis	mookie.com	Profiling	https://www.xaxis.com/static/view/privacy-policy-en
Sépage	www.sepage.com	Profiling	http://www.sepage.com/legal.html

In general, cookies may be disabled by the User controlling and/or amending the browser settings according to the instructions made available by the relevant suppliers at the links listed here below:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)
- [Opera](#)

Finally, our emails may contain a “web pixel beacon” that allows us to know if our emails have been read and check if you clicked on the links in the email. We may use this information for various purposes, including determining which of our emails are of most interest to Users. Pixels will be deleted when the email is deleted.

More information about cookies is available at <http://www.youronlinechoices.com/it>.

10. Data Subject’s rights.

Data Subjects may exercise their rights under articles 7, paragraph 3, and 15 *et seq.* of the GDPR by sending an e-mail to privacy@ucapital24.com or, alternatively, a communication by registered letter with acknowledgement of receipt to the operational headquarters of UCapital24 at Corso Giacomo Matteotti no. 1, 20121, Milan (MI).

The Data Subject may, in particular:

- obtain confirmation as to whether or not personal data concerning him/her are being processed and the purposes of such processing;
- access his/her personal data and information relating to the processing, as well as request a copy of such personal data;
- obtain the rectification of inaccurate personal data and the integration of incomplete personal data;
- obtain, if one of the conditions provided for in article 17 of the GDPR is met, the erasure of personal data concerning him/her;
- obtain, in the cases provided for in article 18 of the GDPR, the restriction on processing;
- if the conditions laid down in article 20 of the GDPR are met, to receive personal data concerning him/her in a structured, commonly used and machine-readable format and request their transmission to another data controller, if technically feasible.

Right to object to the processing for the 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/her personal data carried out for the pursuit of a legitimate interest of the Data Controller. In case of objection, personal data will no longer be processed, provided that there are no legitimate reasons for processing that prevail over the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of a right in court.

Right to withdraw consent.

If consent is required for the processing of personal data, each Data Subject may also withdraw any consent already given at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal. Consent may be withdrawn by writing an e-mail to privacy@ucapital24.com.

Right to lodge a complaint with the Data Protection Authority.

Each Data Subject may lodge a complaint with the Italian Data Protection Authority in the event he/she believes that his/her rights under the GDPR have been violated, according to the modalities indicated on the Italian Data Protection Authority's official website at www.garanteprivacy.it.

12. Amendments to this policy

This Policy may be subject to updates or amendments (also due to new laws or regulations). Substantial changes will in any case be highlighted through the Website, your private area, or notified by e-mail.

Lastly updated on: 28/12/2020