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PRIVACY POLICY - WEDGE APP

v. 1.0 – Last update: 27/06/2024

What is this document? Through this privacy policy drawn up pursuant to articles 13-14 of Reg. (EU) no. 679/2016 ("**Regulation**" or "**GDPR**") and in compliance with the principles contained therein, Wedge Group Sàrl wishes to inform you about the methods of processing of personal data collected and processed through the Wedge mobile app (hereinafter the "**App**").

1. WHO DECIDES WHY AND HOW YOUR PERSONAL DATA ARE PROCESSED?

The data controller is Wedge Group Sàrl, a company under Swiss law with VAT number CHE-471.969.431, with registered office in Rue du Vully 20, CH-2000 Neuchâtel (Switzerland) e-mail: support@wedge.vip (hereinafter "Controller" or "Wedge").

2. WHAT TYPES OF DATA DO WE PROCESS?

From the moment of registration and subsequent use of the App, Wedge may process various information about you ("Data"):

- personal data: name, surname, date of birth, gender;
- contact data: e-mail address;
- authentication and access data: access credentials to the App (username, password);
- data relating to assistance requests: content of the request;
- usage data: information generated in the context of using the App, such as log data, data relating to registrations made, data relating to content created, interaction and transaction processes, performance indicators, data relating to navigation flows and use of features;
- navigation data: such as IP address, domain name of the device used, URL used, information relating to the operating system and IT environment used;

3. WHAT ARE YOUR DATA USED FOR, WHAT LEGAL BASIS AUTHORIZES US TO USE THEM AND HOW LONG DO WE KEEP THEM?

Wedge acquires and processes your Data for the purposes specified below. The processing is legitimized by the legal basis highlighted for each purpose pursuant to art. 6 of the Regulation.

The data will be stored in a form that allows the identification of the interested parties for a period of time not exceeding the achievement of the indicated purposes, in compliance with the principle of minimization pursuant to art. 5.1 c) GDPR.

	Purpose	Legal basis	Retention period
a.	Registration and authentication to the App The Data will be processed for registration or authentication to the App.	Execution of pre-contractual and contractual measures [art. 6.1 b) GDPR].	The data will be retained until the account is deleted, except for data retention to fulfill legal purposes.
b.	Provision of services offered through the App The Data will be processed to provide you with the requested services (e.g. creating and managing challenges, managing the account, recovering credentials, etc.).	Execution of pre-contractual and contractual measures [art. 6.1 b) GDPR].	The data will be retained until the account is deleted, except for data retention to fulfill legal purposes.
c.	Management and processing of requests for information and support. The Data provided will be processed to manage and respond to requests for information and technical support, as well as for the purpose of assisting you before, during and after the provision of our services.	Execution of pre-contractual and contractual measures [art. 6.1 b) GDPR].	The data will be retained for the period necessary to process the request, except for the period necessary to defend the rights of the Owner.
d.	Compliance with legal obligations Your Data will be processed by the Data Controller in order to manage and respond to requests from judicial authorities.	Legal obligation [art. 6.1 c) GDPR].	In accordance with applicable legislation.
e.	Operation, maintenance and improvement of the Site and the App The Data Controller will process the Users' data to allow navigation, consultation of the Site, as well as to improve your browsing experience.	Legitimate interest [art. 6.1 f) GDPR] attributable to the need of the Owner to allow the use of the Site and its improvement.	Not applicable (aggregated or anonymous data).
f.	Complaints management, protection of interests and exercise of the right of defense The Data Controller may process the Users' data to exercise and protect their rights in extrajudicial and judicial proceedings.	Legitimate interest [Art. 6.1 f) GDPR] attributable to the need to ascertain, exercise or defend a right and/or an interest.	Personal data will be retained for the period necessary to defend or exercise the right.
g.	Activities related to the completion of corporate transactions. Your Data will be processed in order to allow its communication in the event of corporate transactions.	Legitimate interest [art. 6.1 f) GDPR] attributable to the need to finalize corporate operations.	Personal data will be retained for the time necessary for this purpose.

With reference to the purposes under a), b) for communications relating to the contractual relationship, c), e), via the mobile app, the Data Controller may send push notifications to the User.

The provision of data for the purposes under a), b) and c) is optional. However, failure to provide data will make it impossible to provide the services or provide the information requested.

The processing activities under d), e), f) and g) do not require your specific consent as they are based on a legal obligation (art. 6, c. 1, lett. c) of the GDPR) or on the legitimate interest of the Data Controller (art. 6, c. 1, lett. f) of the GDPR). In any case, in compliance with the GDPR, we have carried out an in-depth balancing of interests aimed at protecting and guaranteeing the privacy and fundamental rights of the interested parties.



4. TO WHOM DO WE COMMUNICATE YOUR DATA?

The Company may communicate some of your Data to the subjects it uses to carry out activities necessary to achieve the purposes indicated and described in the previous paragraph 4, including, by way of example:

- i) Internet or application service providers and the platforms used by the Data Controller;
- ii) public entities to which such data must be communicated by law or by order of the Authority.

These subjects act as independent data controllers or data processors. In the latter case, the Data Controller shall formally designate such subjects as data processors pursuant to art. 28 of the GDPR. The list of Data Processors may be requested by contacting the Data Controller and/or the DPO at the contact details indicated in the previous paragraph 2.

Your Data will be processed by the internal personnel of the Data Controller specifically authorized pursuant to art. 29 of the GDPR.



5. TUOI DATI SONO TRASFERITI IN UN PAESE AL DI FUORI DELL'UNIONE EUROPEA E COME SONO TUTELATI?

As a rule, we do not transfer your Data to countries outside the European Union. However, since some important service providers to our infrastructure are based outside the European Union (e.g. Cloud service providers), by using our services your Data may be stored on servers located outside the European territory.

In such cases, we guarantee that the processing of personal data is carried out in compliance with applicable law, adopting adequate guarantees (such as adequacy decisions, standard contractual clauses approved by the European Commission or other guarantees provided by the GDPR) as well as suitable and appropriate security measures to protect the confidentiality of your Data.

More information on the transfers and guarantees adopted can be requested by writing to us at the contact details indicated in the previous paragraph 2.



6. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

As a data subject, you have the right to:

- obtain confirmation that processing is in progress;
- obtain access to your personal data held by the Data Controller pursuant to art. 15 GDPR;

- obtain the rectification of inaccurate or incomplete data pursuant to art. 16 GDPR;
- obtain the erasure of data if the conditions set out in art. 17.1 GDPR exist;
- request the limitation of processing in the cases provided for by art. 18 of the GDPR;
- transfer your data to another data controller without impediments pursuant to art. 20 GDPR;
- object to the processing of data pursuant to art. 21 GDPR;
- lodge a complaint with the Supervisory Authority or appeal to the Judicial Authority. In Italy, this supervisory authority is represented by the Guarantor for the Protection of Personal Data (www.garanteprivacy.it).

The above rights may be exercised against the Data Controller by writing to the email address support@wedge.vip.



7. IS IT POSSIBLE THAT THIS POLICY WILL BE CHANGED IN THE FUTURE?

Wedge reserves the right to make changes and/or additions to this Privacy Policy, also as a consequence of any subsequent regulatory changes and/or additions.

Wedge will inform you of such changes and these will be binding as soon as they are transmitted or made available through the App or otherwise.