# This is an automated translation, its purpose is merely informative. Only the documents in the official languages of the State are legal.

#### **Privacy Policy**

## 1. Who is responsible for processing your data?

The controller of your personal data is Wedge Group Sàrl (after "WEDGE"), with C.I.F CHE-471.969.431, and registered office at Rue du Vully 20, CH-2000 Neuchâtel, Switzerland.

This Privacy Policy regulates access to and use of the Platform (hereinafter the "Platform") that WEDGE makes available to Internet users (hereinafter the "Users") interested in the content (hereinafter the "Content") and services (hereinafter hereinafter the "Services") offered by WEDGE on the Platform.

Contact email: <a href="mailto:support@wedge.vip">support@wedge.vip</a>.

#### 2. Recommendations

Please read carefully and follow the recommendations below:

- Keep your computer equipped with properly updated antivirus software against malicious software and spyware applications that can compromise your Internet browsing and the information stored on your computer.
- Please read and review this Privacy Policy and all legal texts provided by WEDGE on the Platform.

## 3. Information about the personal data that WEDGE collects through the Platform

For the proper functioning of the Platform, WEDGE may have access to the following data provided by the User:

- (i) Identification data: name, surname, date of birth, gender.
- (ii) Traffic data: IP address, device used.
- (iii) Contact details: email, telephone.

## 4. What is the legal basis for processing your personal data?

The processing of Users' personal data carried out by WEDGE through the Platform is legally based on the execution of a contract with the User, or for precontractual measures at the User's request.

Notwithstanding the basis of legality in the previous paragraph, the basis of legality for sending commercial communications will be the consent given by the User.

WEDGE takes protecting your privacy and personal data very seriously. For this reason, your personal data is kept securely and treated with the utmost care, in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and the free movement of such data ("General Data Protection Regulation" or "GDPR").

This Privacy Policy regulates access and use of the Service that WEDGE makes available to Users interested in the Services and Content available on the Platform.

Regarding the sending of commercial communications, the User may withdraw their consent at any time by sending a message to the following email address: support@wedge.vip. The withdrawal of consent does not compromise the lawfulness of the processing carried out based on the consent previously given.

For the purposes of declaring, exercising or defending a right in legal proceedings or similar, WEDGE processes your personal data based on its legitimate interests (preserving evidence and allowing defense in legal proceedings or similar).

#### 5. For what purposes are your personal data processed?

Personal data collected by WEDGE may be used for the following purposes, taking into account any consent given in the corresponding registration form:

(i) Provide the Services and provide the Content offered through the Platform.

(ii) To manage, process and respond to User requests, incidents, or complaints.

(iii) If the User has given their consent, to send commercial communications or information about WEDGE products and services by letter, telephone, e-mail, SMS/MMS or other equivalent means of electronic communication;

(iv) Declaration, exercise or defense of rights in legal proceedings or similar.

# 6. Veracity of data provided by Users

The User guarantees the veracity of the personal data provided and undertakes to notify WEDGE of any changes thereto. The User will be responsible, in any case, for the veracity of the data provided, WEDGE reserving the right to exclude from the services any User who has provided false data, without prejudice to any other measures that may be taken by law.

Users are recommended to protect their data with utmost diligence using appropriate security tools. WEDGE will not be responsible for any theft, illicit modification or loss of data, except in the case of intent or gross negligence on the part of WEDGE.

Any modification or update of data must be communicated to WEDGE through the means of communication provided for in this Privacy Policy.

## 7. Storage of personal data

The User's personal data will be kept for the following periods:

Purpose Legality basis Conservation period

To provide the Services and provide the Content offered through the Platform. Execution of a contract with the User, or for pre-contractual measures at the User's request For the duration of the contract

To manage, process and respond to User requests, incidents, or complaints. Execution of a contract with the User, or for pre-contractual measures at the User's request For the duration of the contract, or if no contract has been concluded, for a period of 1 (one) year after receipt of the request or complaint

To send commercial communications or information about WEDGE products and services by letter, telephone, e-mail, SMS/MMS or other equivalent means of electronic communication Consent Until the User revokes their consent or up to 2 (two) years after the data collection, whichever comes first

Declaration, exercise or defense of rights in legal proceedings or similar Legitimate interests of WEDGE (preservation of evidence and allowing defense in legal proceedings or similar) For the applicable limitation period

The protection of Users' privacy and personal data is very important to WEDGE. Therefore, WEDGE makes every effort to prevent User data from being misused. Only authorized personnel have access to User data.

WEDGE undertakes to comply with its obligation of secrecy and confidentiality of personal data in accordance with the provisions of applicable legislation.

#### 8. User Rights

Users have the right to:

- (i) Access your personal data;
- (ii) Request the rectification of any inaccurate data;
- (iii) Request the deletion of your personal data;
- (iv) Request the limitation of the processing of your personal data;
- (v) Object to the processing of your personal data;
- (vi) Request portability of your personal data;
- (vii) Not be subject to automated individual decisions.

The User may exercise all these rights through the following email address: support@wedge.vip indicating the reason for their request.

The User can also send their order by post to the following address: Rue du Vully 20, CH-2000 Neuchâtel, Switzerland.

The communication addressed to WEDGE must contain the following information:

- User's name and surname;
- Explanation of the request.

If the User considers that the processing of their personal data is not in compliance with applicable legislation, or that their rights are not being respected, without prejudice to any other administrative or judicial remedy, the User has the right to lodge a complaint with the National Data Protection Commission (CNPD) – www.cnpd.pt – which is the competent Control Authority in Portugal.

The Control Authority will inform the User of the processing and outcome of the complaint.

#### 9. Data security

The protection of Users' privacy and personal data is very important to WEDGE. For this reason, WEDGE has taken all measures at its disposal to prevent your data from being misused, allowing access to it only to authorized personnel.

WEDGE maintains adequate security for the protection of personal data in accordance with applicable legislation and has established all technical means at its disposal to prevent the loss, misuse, alteration, unauthorized access and theft of data provided by the User through the Platform, without prejudice to informing the User that security measures on the Internet are not unassailable.

WEDGE undertakes to comply with the duty of secrecy and confidentiality in relation to personal data in accordance with applicable legislation.

## 10. Recipients of personal data

In principle, personal data will not be transferred to another third country or international organization, with the exception of transfer to Switzerland, under the adequacy decision of the European Commission (Commission Decision of 26 July 2000 under Directive 95 /46/EC of the European Parliament and of the Council and concerning the adequate level of protection of personal data in Switzerland).

We will only transfer your personal data outside the European Union or the European Economic Area, i.e. to a third country, ensuring strict compliance with European legislation on data transfer to third countries and we will provide you with all necessary information, in particular, an indication of the guarantees for this transfer (e.g. standard contractual clauses, adequacy decision, etc.).

To achieve the purposes indicated above, WEDGE may transfer personal data to the following categories of recipients:

a) Judicial, administrative and regulatory authorities;

b) Service providers/suppliers.

#### 11. Questions

If you have any questions about our Privacy Policy, please contact us at the following email: support@wedge.vip.

Likewise, if you consider that your rights are not adequately safeguarded, you have the right to lodge a complaint with the National Data Protection Commission (CNPD) – www.cnpd.pt, Av. D. Carlos I, 134, 1º, 1200-651 Lisboa, T (+351) 213 928 400, geral@cnpd.pt.

## 12. Declaration

The User declares that they have been provided with information regarding the processing of their personal data for the purposes described in this Privacy Policy.

## 13. Cookies

Cookies are not used on the Platform.