

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA OF THE PARTICIPANTS IN THE GOBEYOND CONTEST

Last update and effective date: April 2022

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the "**Regulation**"), Sisal S.p.A., as Data Controller (the "**Data Controller**" or the "**Society**"), wishes to inform those who subscribe to the site www.gobeyond.info (the "**Data Subjects**" and the "**Site**") about the purposes and methods of processing personal data, their scope of communication and the nature of their conferment.

1. Data Controller

The Data Controller is Sisal S.p.A., with registered office in 20159 Milan, via Ugo Bassi 6, which can be reached at privacy_sisal@legalmail.it.

2. Data Protection Officer

The Data Controller appointed a Data Protection Officer ("DPO") who can be reached at the following email address: dpo@sisal.it.

3. Source of the personal data

The personal data being processed are acquired by the Data Controller and/or through Third Parties specifically appointed directly by the Data Subject at the time of registration and use of the Site, and whenever the Data Subject participates in activities related to the Site (i.e., GoBeyond Academy, innovation contest, etc.). The data may also be acquired from Third Parties, such as partners of GoBeyond contests, in order to verify that the Data Subjects meets the criteria for participation in the contests described in the advertisements, and from social media such as Google, if the Data Subject uses the social login mode made available by the Data Controller for registration and access to the Site.

4. Purpose and legal basis of the processing

The Data Controller processes the personal data of the Data Subject for the following purposes:

- a) Allow the Data Subject to register on the Site, use it and participate in activities reserved for members such as, for example, innovation contests and the GoBeyond Academy, and manage the related activities (i.e. identification of the winners of the contests, awarding of prizes). The legal basis of such processing is the execution of a contract in which the Data Subject is a party (Article 6 paragraph 1 letter b) of the Regulation);
- b) Fulfill legal obligations and orders/provisions of Public Authorities and/or Supervisory Bodies: in this instance, the processing of personal data is necessary for the fulfillment of legal obligations by the Data Controller and/or orders/provisions of Public Authorities (i.e., public security Authorities, Judicial Authorities) and/or Supervisory Bodies. The legal basis of this processing is the fulfillment of a legal obligation to which the Data Controller is subject (Article 6 paragraph 1 letter c) of the Regulation).
- c) Pursue the legitimate interests of the Data Controller in order to verify the existence of the conditions of participation in the activities by the Data Subject, such as the innovation contests carried through the Site; to monitor and verify the quality of the service (including the sending to the Data Subject, by the Data Controller, of any surveys aimed at investigating the level of interest in the initiatives reserved for members of the Site or at collecting evidence on the startup market, also for the purposes of the development of the contests or the Academy); to manage any disputes and to exercise or defense a right out of court and judicially. The legal basis of this processing of personal data is the pursuit of the legitimate interest of the Data Controller (Article 6 paragraph 1 letter f) of the Regulation).

5. Categories of personal data processed and processing methods

The personal data processed by the Data Controller are:

- anagraphic data (i.e., name and surname);
- contact data (i.e., email address);
- audio and video recordings (as acquired during the participation in the activities by the members of the Site, for example during the elevator pitch provided in the context of innovation contests) and pictures (for example if provided by the Data Subject or through the social media following the use of the social login made available by the Data Controller);
- payment data (e.g., IBAN of the Data Subject for the possible disbursement of the loan following the victory of the contest);
- data regarding the relationship of the Data Subject with the Data Controller and/or with the Data Controller's partners (in order to verify that the Data Subject meets the criteria for participation in the contests described in the

advertisements);

- any other data voluntarily communicated to the Data Controller by the Data Subject.

Data Subjects who choose to use the social login method are aware that, in this case, the data of the Data Subject transmitted by the Social Media to the Data Controller are the name, surname, email and profile picture, in addition to language preferences.

The processing of such data takes place using manual, automatic and telematic tools, with logic strictly related to the purposes listed above and, in any case, in compliance with the precautions, guarantees and necessary measures prescribed by the applicable law, aimed at ensuring the confidentiality, integrity and availability of the data and at avoiding damages, whether material or immaterial (i.e. loss of control of personal data or limitation of rights, discrimination, identity theft, financial loss, unauthorized decryption of pseudonymization, damage to reputation, loss of confidentiality of personal data protected by professional secret or any other significant economic or social damage).

6. Communication and dissemination

For the pursuit of the purposes, the Data Controller has the right to communicate personal data to recipients belonging to the following categories:

- Public Authorities and/or Supervisory Bodies (i.e. judicial authorities, public security authorities, etc.);
- other companies of the group to which the Data Controller belongs, or in any case parent companies, subsidiaries or affiliates, pursuant to art. 2359 c.c., also located abroad, in the context of the existing intercompany agreements for the management of the activities referred to in the aforementioned purposes;
- partners who contribute, together with the Data Controller, to the promotion, organization and management of the activities reserved for members of the Site (contest, Academy);
- operators of the web platforms where the videos of the participants in the innovation contests will be published;
- online and offline press;
- subjects that provide data acquisition, processing and storage services;
- subjects that provide services for the management of the Data Controller's information system and telecommunications networks (including chat and mailing services);
- subjects that carry out documentation archiving and data-entry activities;
- subjects who carry out activities of assistance to the Data Subject;
- professional firms or companies in the context of assistance and consultancy relationships;
- subjects that carry out assistance and communication consultancy activities;
- subjects who carry out control, revision and certification of the activities carried out by the Data Controller;
- subjects who in various ways succeed the Company in the ownership of legal relationships (e.g., assignees or potential assignees of goods, credits and/or contracts).

The subjects belonging to the categories listed above operate independently as separate Data Controllers, or as Data Processors appointed for this purpose by the Data Controller. The updated list of third parties to whom the personal data are communicated is available by submitting a request to privacy_sisal@legalmail.it. The data may also be known, in relation to the performance of the tasks assigned, by the staff of the Data Controller, specifically authorized by the Data Controller.

The personal data of the Data Subject may be disseminated within the limits of what is indicated from time to time by the Data Controller and communicated to the Data Subject (i.e., within the contests carried through the Site, the publication of the videos of the Data Subject, on the web platforms of the Data Controller or third parties, as well as the communication of the names of the winners to the online and offline press) or following the consent of the Data Subject.

7. EXTRA-UE transfer of data

Personal Data may be transferred to Parties located in countries outside the European Union which cooperate with the Data Controller to pursue the above purposes. Data transfer will take place only against the existence of international agreements or adequacy decisions by the EU Commission (Article 45 of the Regulation) or against the stipulation of Binding Corporate Rules ("BCR" pursuant to Article 47 of the Regulation) or in any case on the basis of other appropriate guarantees that guarantee the personal data transferred an adequate degree of protection. A copy (or an extract) of the guarantees adopted for the transfer as well as the list of third countries / international organizations to which the personal data have been transferred, may be requested at the e-mail address privacy_sisal@legalmail.it.

8. Data Retention

The personal data will be kept by the Data Controller for the entire duration of the relationship with the Data Subject, i.e. until the data subject's account on the Site remains active. If the Data Subject participates in an innovation contest, the data will also be kept for 10 years from the end of this contest pursuant to tax legislation.

For the pursuit of legitimate interests, the Data Controller will keep the personal data of the Data Subjects until the exhaustion of these legitimate interests, considering either the rights of the Data Controller and the Data Subject. It is specified that, in relation to the activities of sending to the Data Subject, by the Data Controller, any surveys aimed at investigating the level of interest in the initiatives reserved for members of the Site or at collecting evidence on the startup market (also for the purpose of evolution of the Contest) the personal data of the Data Subject will be kept for 36 months from the end of the Contest.

Once these terms have elapsed, the Data Controller will delete the personal data of the Data Subject or will anonymize them. In the event of any further processing carried out for the handle of complaints, for the exercise of a right in court or to fulfill further obligations provided for by law, these periods may be extended until the end of the handle of the complaint, the exhaustion of any judicial procedure, or the end of the obligation provided for by law.

9. Rights of the Data Subject

The rights referred to in Articles from 15 to 22 of the Regulations are guaranteed. In particular, the Data Subject can obtain:

a) confirmation of the existence of personal data processing concerning him and, in this case, access to such data; b) the correction of inaccurate personal data and the integration of incomplete personal data; c) the deletion of personal data concerning him, in cases where this is permitted by the Regulation; d) the limitation of processing, in the cases provided for by the Regulation; e) the communication, to the recipients to whom the personal data have been transmitted, of requests for rectification / cancellation of personal data and for the limitation of processing received by the Data Subject, unless this proves impossible or involves a disproportionate effort; f) the receipt, in a structured format, commonly used and readable by an automatic device, of the personal data provided to the Data Controller, as well as the transmission of the same to another Data Controller. The Data Subject also has the right to object at any time, for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection, without prejudice to the case in which the Data Controller demonstrates the presence of overriding legitimate reasons or the exercise or defense of a right pursuant to art. 21 of the Regulation. The Data Subject also has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way, unless this decision: a) is necessary for the conclusion or execution of a contract between the interested party and the Data Controller; b) is authorized by the law of the Union or of the Member State to which the Data Controller is subject; c) is based on the explicit consent of the interested party. In the cases referred to in the aforementioned letters a) and c), the Data Subject has the right to obtain human intervention from the Data Controller, to express their opinion and to contest the decision. The Data Subject may submit requests to the address privacy_sisal@legalmail.it indicating in the subject "Privacy - exercise of privacy rights", detailing which right he intends to exercise and providing the Data Controller with the information needed to identify him pursuant to articles 11 and 12 of the Regulation. The Data Subject also has the right to lodge a complaint with the supervisory authority, in particular in the Member State in which he habitually resides, works or in the place where the alleged violation for which the complaint is submitted has occurred (e.g., the Garante per la protezione dei dati personali in Italy), as required by art. 77 of the Regulation, as well as to take the appropriate judicial offices pursuant to art. 78 and 79 of the Regulation.

10. Nature and obligatory of the conferment

The registration on the Site and participation in related activities by the Data Subject requires the provision of his/her personal data. The provision of data is mandatory for the purposes referred to in paragraph 4, letters a) and b). Any refusal by the Data Subject to provide the necessary information will make it impossible to register on the Site and participate in related activities (i.e. contest, Academy). The processing for the purposes referred to in letters c) is not mandatory and the Data Subject may oppose such processing in the manner indicated in the paragraph "Rights of the Data Subject" of this privacy policy. If the Data Subject opposes his data may not be used for this purpose unless the Data Controller demonstrates the presence of binding legitimate reasons or the exercise or defense of a right pursuant to of art. 21 of the Regulation.

11. Update of the Privacy Policy

The Data Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained herein to stay updated with respect to any changes that have occurred since the last consultation.