



## **Legal Notice on the treatment of personal data according to article 13 of EU Code 2016/679**

With due regard for article 3, paragraph 1 and of article 3 of EU Code 2016/679 concerning the treatment and the free circulation of personal data (the “Code”), U-Start S.A., headquarters in Lugano, Piazzetta San Carlo, n. 2 and secondary headquarters in Milano, Viale Luigi Majno, n. 15 (the “Company” or “U-Start”), in its qualities of holder of the treatment, informs you of the following.

### **1. Personal Data subject to treatment**

The personal data relative to your person treated by the Company are: name, surname and e-mail address, profession (the “Data”).

### **2. Legal basis and mode of Data treatment**

The Company proceeds to the Treatment of Data on the basis of your legitimate interest, since you operate in the Venture Capital industry and acting in favor of funds, companies and/or juridical entities with which U-Start collaborates and/or co-invests.

The treatment of Data occurs through the operations or group of operations indicated by article 4, subsection 1), number 2), of the Code: gathering, registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication via transmission, diffusion or any other mode of provision, comparison or interconnection, limitation, cancellation or destruction.

These operations are pursued both with the help of digital or automated tools as well as manually and through hard-copy archives.

The Data will be treated by the Company in respect of the principles of honesty, legitimacy, transparency and of protecting your privacy and your rights, as well as in accordance with the current disposition regulating this area and through the adoption of appropriate safety measures according to article 32 of the Code.

The treatment of Data is effectuated by the holder and/or personnel duly instructed by the holder of the treatment itself and/or by third subjects explicitly nominated, where necessary, responsible for the treatment by the holder. If the treatment is effectuated by third subjects who act as autonomous holders of the treatment, these subjects commit with the Company to respect what the current legal dispositions rule in area of personal data treatment and to conform, for what is possible, to this waiver.

### **3. Purposes of the treatment of the data**

The treatment of Data is aimed to the sending, via e-mail, of communications relative to, but not only, the main news on the industry and the latest investments made by Club members of the Company (newsletter).

### **4. Conferral of the Data**



The conferral of the data for the purposes illustrated in the aforementioned point 3 is optional and therefore your eventual refusal to confer the Data will entail the impossibility for the Company to proceed with the sending of the newsletter via e-mail.

## 5. Communication of the Data

The Company, if strictly necessary for pursuing the purposes described in this waiver, may communicate the Data to third subjects indicated in this paragraph, to whom it asks to adopt adequate measures to maintain privacy over the Data received and it asks not to use this information for any other purpose.

The Data may be communicated to the following categories of receivers:

- constitutional institutions or of constitutional status;
- primary or secondary headquarters of the Company, even abroad;
- clients and members of U-Start Club;
- companies that run the management and maintenance of the Company's informatic systems;
- companies that run activities of video-editing and/or making and printing of *brochures*, flyers, videos and/or corporate *magazine*, etc.

These subjects, where necessary, will be nominated by the holder of the treatment responsible for the treatment.

## 6. Transfer of the Data

The Data may be transferred, within the limitation set by the purposes of this waiver illustrated in the aforementioned point 3, to countries of the European Union or other third countries; this transfer will occur in accordance with the dispositions on the subject ruled by the Code, such as decisions of adequacy taken by the European Commission (i.e. Switzerland) or the use of standard contractual clauses approved by the European Commission.

## 7. Diffusion of the Data

The Data will not be subject to diffusion.

## 8. Rights of the person concerned

In conformity with what is ruled by the Code, the rights recognized to you in relation to the Data are the following:

- **access:** You can obtain information regarding the treatment of your Data and a copy of them;
- **amendment:** in case you believe that your Data are inaccurate or incomplete, you may ask that these Data may be amended or modified following your instruction;
- **cancellation:** with the exception of the cases ruled by the applicable law, you have a right to ask the cancellation of your Data, when: (i) the data are not anymore necessary for the purposes for which they were gathered and treated; (ii) you revoke your agreement to the treatment; (iii) you oppose the treatment for purposes such as direct marketing or the treatment effectuated to pursue other purposes and there are no



- legitimate reasons for the continuation of the treatment; (iv) your Data are being treated illegitimately; (v) the cancellation is imposed by the law;
- **limitation:** You may ask for the limitation of the treatment of your Data in the hypothesis described by article 18 of the Code;
  - **opposition:** You have the right to oppose the treatment of your Data in the hypothesis described by article 21 of the Code;
  - **portability of the Data:** if the treatment is based on consensus, you have the right to receive, in a structured format, of standard use and readable from an automatic device, the personal Data that you have given and, if this is technically impossible, to the safe transmission of the Data to another holder of the treatment.

You may also, in every moment, ask not to receive anymore U-Start informative newsletter by contacting the Holder of the Treatment through the contact data indicated below or by using the link provided at the bottom of every newsletter.

To safeguard your rights and to protect your Data, you may, in every moment, decide to make a complain to the supervising authority in charge or to initiate an action to the legal entities in charge.

#### **9. Time of conservation of the Data**

The Data will be stored for the time necessary to the accomplishment of the purposes for which they were gathered and anyhow not beyond the limits provided for by law.

#### **10. Holder of the treatment**

Holder of the treatment is U-Start S.A., with headquarters in Lugano, piazzetta San Carlo, n.2 and secondary headquarters in Milan, Viale Luigi Majno, n. 15, C.F./P. IVA 08556580960, e-mail address: [info.privacy@u-start.biz](mailto:info.privacy@u-start.biz).

Sincerely,

U-Start S.A.