DISCLOSURE REGARDING PERSONAL DATA PROCESSING PURSUANT TO ARTICLES 14 OF THE REGULATION (UE) 2016/679

PayDo S.p.A. (hereinafter, “PayDo”), with registered office at Viale Regina Margherita, 30, Milan (MI), as the Controller of the processing, is providing you with the following information as required by the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (“GDPR”):

1. WHAT PERSONAL DATA WE PROCESS

The Controller processes common personal data, particularly identifying information (name, surname, email address or mobile number), IBAN code and language preference, for the purposes set forth in this disclosure.

2. PURPOSE OF THE TREATMENT AND RELEVANT LEGAL BASIS

PayDo may process your personal data in order to:

a) comply with obligations under applicable laws and/or regulations and orders issued by competent authorities/supervisory and monitoring bodies;

b) allow you to use the service, requested by you, to automatically fill fields necessary to complete Plicks you will receive in the future.

The legal basis for processing your personal data for the purposes under the preceding subparagraphs a) and b) consists, respectively, of the satisfaction of a legal obligation (article 6, section 1, subparagraph c), GDPR) and the performance of a contract to which the data subject is a party (article 6, section 1, subparagraph b), GDPR).

3. CONTROLLER

The Controller is PayDo S.p.A., as indicated above, represented by its legal representative pro tempore.

4. NATURE OF PROVIDING THE DATA

Providing the data is mandatory for the purposes set forth in the previous subparagraph 2. If you refuse to provide your data, PayDo will be unable to provide the requested service to you of auto-filling the fields necessary to complete Plicks you receive in the future.

5. TYPE OF PROCESSING AND RETENTION PERIOD

In relation to the purposes indicated above, your personal data may be processed using computer tools in accordance with GDPR. The processing operations shall be performed in such a manner that the security of the personal data is guaranteed, as set forth in Article 32, GDPR.

Your personal data will be processed for the period of time necessary from time to time to complete the Plick you receive. After that, to allow you to use the service you signed up for, the personal data will be retained by the Controller for a period of 12 months after the latest Plick you received or validated. After that period, your personal data may be retained by the Controller solely to satisfy any legal or tax obligations. Your personal data will be stored in servers owned or used by the Controller located in Europe.

6. WHO WE MAY SHARE THE PERSONAL DATA WITH

To achieve the goals listed above, the Controller may need to disclose your personal data to third parties belonging to the following categories:

- banks or financial institutions, in order to carry out the payment requests of the Plicks received;
- supervisory authorities or bodies, to comply with legal or regulatory obligations or orders;
• consultants of the Controller involved in the data processing process.

In some cases, Parties in the categories listed above will act completely autonomously as separate Controllers and, in other cases, as external Processors or persons acting under the authority of a Controller or Processor designated by PayDo for that purpose, in accordance with the provisions of Article 28, GDPR.

7. DATA SUBJECTS’ RIGHTS

In relation to the processing described in this disclosure, as the data subject you may, on the terms set forth by GDPR, exercise the rights set forth in Articles 15 to 21 of the GDPR and, specifically, the following rights:

• **Right of access**: right to obtain confirmation as to whether personal data concerning you are being processed, and, if so, obtain access to your personal data – including a copy thereof – and the following (among other) information:
  a) purpose of treatment
  b) categories of personal data processed;
  c) recipients to whom the data have been or will be disclosed;
  d) period the data will be retained or the criteria used to determine that period;
  e) the data subject’s right (rectification or erasure of the data, restriction of the processing and right to object to the processing);
  f) right to lodge a complaint;
  g) right to receive information about the origin of your personal data if they were not collected from the data subject;
  h) the existence of automated decision-making, including profiling;

• **Right to rectification**: right to obtain rectification of inaccurate personal data concerning you and/or completion of incomplete personal data.

• **Right to erasure (right to be forgotten)**: right to obtain the erasure of personal data concerning you, when:
  a) the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  b) you withdrew your consent and there is no other legal ground for the processing;
  c) you successfully objected to the processing of the personal data;
  d) the data were unlawfully processed; e) the data have to be erased to comply with a legal obligation;
  f) the personal data were collected in relation to the offer of information society services under Article 8, section 1, GDPR.

The right to erasure does not apply to the extent that processing is necessary to comply with a legal obligation, to perform a task carried out in the public interest or to establish, exercise or defend a legal claim.

• **Right to restriction of processing**: right to obtain restriction of processing, when:
  a) the accuracy of the personal data is contested by the data subject;
  b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  c) the personal data are required by the data subject to establish, exercise or defend a legal claim.

• **Right to object**: right to object to processing data that relate to you, unless there are legitimate grounds for the Controller to continue the processing.

• **Right to data portability**: right to receive, in a structured, commonly used and machine-readable format, personal data relating to you that were provided to the Controller and the right to transmit those data to another controller without hindrance, if the processing is based on consent and is carried out by automated means. In addition, the right to have your personal data transmitted directly from PayDo to another controller where technically feasible.

• **Right to lodge a complaint with the Italian Personal Data Protection Authority**, Piazza Venezia n. 11 – 00187, Roma (RM).
The rights above may be exercised, in regard to the Controller, by contacting PayDo at the following e-mail address: info@plick.eu.

You may exercise your rights as a data subject free of charge pursuant to the Article 12, GDPR. However, if you make requests that are manifestly groundless or excessive, which may be because they are competitive, the Controller may charge you for a reasonable expense contribution, in view of the administrative costs incurred to address your request, or refuse to satisfy your request.