

PRIVACY POLICY

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation ("UK GDPR"). We are also subject to the EU General Data Protection Regulation ("EU GDPR") in relation to goods and services we offer to individuals and our wider operations in the European Economic Area (EEA).

With this privacy policy ("Privacy Policy"), we wish to provide you with information on the processing operations of your personal data collected through our application "U-App" for smartphones and tablets ("App")

Remember that you will be able to use the services made available on our App ("Services") only after having read and accepted the "Terms and Conditions of the Site" [<https://www.u-earth.eu/terms-conditions>] ("General Conditions") of our website www.u-earth.eu (the "Site").

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you. Those third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies as appropriate.

This version of the privacy policy is primarily written for adults, including parents and guardians of child users.

WHO IS THE OWNER OF THE PROCESSING OF YOUR PERSONAL DATA?

The data controller of your data is U-Earth Biotech Ltd ("U-Earth"), VAT number GB311666618, incorporated and registered in the United Kingdom with no. 11599132 having its registered office in 172 Fulham Road, SW10 9PR London. The use on the Site and in this Privacy Policy of expressions such as "we" and "our" must be understood as referring to U-Earth.

You can contact U-Earth and make any questions or comments regarding this Privacy Policy, by writing to the e-mail address legal@u-earth.eu.

WHICH CATEGORIES OF DATA DO WE TREAT?

For the pursuit of the purposes indicated in the next section, we process the following categories of data:

1. Navigation data

Through the App we acquire some personal data relating to your navigation.

This category includes:

- The IP addresses of the computers and devices used to access the App and to use the Services;
- information relating to the device used to visit or access the Site (such as, for example, model, operating system and browser used, etc.).

2. Geo-location data

If the user allows the use of the geo-location function on the App, U-Earth will be able to acquire precise data relating to your location, in compliance with the configurations you have chosen directly through your device.

3. Data provided voluntarily by the user

We may collect the following information, provided by you directly (eg via the online registration form):

- name, surname, e-mail address;
- identification codes, such as username and password and a profile picture;

- information provided as part of a request for assistance or clarification (reason for contact or complaint, etc.);
- information provided when participating in user surveys and market surveys.

FOR WHAT PURPOSES AND ON WHICH BASIS DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data for the following purposes:

- (A) to provide you with the requested Services and, therefore, for purposes strictly connected and instrumental to the establishment and management of customer relations.

The processing of your personal data is necessary to execute the contract we have entered into with you or the pre-contractual measures adopted at your request. In particular, we process your personal data for:

- allow you to browse and use the App;
- verify your identity;
- manage your registration and account;
- allow you to use, in compliance with the General Conditions, the Services requested from time to time.
- provide you with assistance and/or follow up on your complaints through our customer service (through remote communication tools, such as email, chat, etc.) in relation to the requested Services and/or the products purchased;

The treatments for the purposes referred to in this section do not require your consent as it is necessary to allow us to provide the Services and, therefore, if you do not intend to communicate your personal data for this purpose, we will not be able to provide you with any Service.

The data processed for this purpose belong to the following categories: navigation data and data provided voluntarily by the user.

- (B) to fulfil the legal obligations to which U-Earth is subject and, therefore, for purposes deriving from legal obligations, regulations, community legislation, provisions issued by authorities legitimated by the law or by supervisory and control bodies

We also process your personal data for:

- allow us to act in accordance with applicable legal and/or regulatory obligations;
- to assert and defend the rights of U-Earth;
- manage and respond to requests from competent authorities (administrative, tax and judicial).

The data processed for this purpose belong to the following categories: navigation data and data provided voluntarily by the user.

- (C) To pursue the legitimate interests of U-Earth

We also process your personal data for:

- purposes of improving products and/or services, internal management control, to operate and defend the rights of U-Earth;
- carry out a sale of assets, a company or branch of a company as well as a potential merger or corporate and/or financial transactions, in this case communicating and transferring the data to the third party (s) involved in the operation;
- identify or prevent fraud;
- maintain and improve the security of the Site, our network and our information system.

These treatments are carried out on the basis of our legitimate interest and therefore do not require your specific consent. However, you can object to the processing at any time by sending a written communication to legal@u-earth.eu.

The data processed for this purpose belong to the following categories: navigation data, geo-location data and data provided voluntarily by the user.

- (D) Subject to your express and specific consent we may process your personal data to send you marketing communications (including discounts, special offers, market research and surveys) relating to our products and/or Services or to notify you of initiatives, contents and/or updates on our products and / or Services, also in light of your interests, your interactions with the Site.

This treatment requires your prior consent. You can revoke any consent given at any time by sending a written communication to legal@u-earth.eu or by clicking on the unsubscribe link in each direct marketing communication by email.

The data processed for this purpose belong to the following categories: navigation data, geo-location data, data provided voluntarily by the user and data collected through the use of cookies and other tracking tools.

WHO CAN WE COMMUNICATE YOUR DATA TO?

Your data may be disclosed to the following categories of subjects:

- parent companies and/or associates of and/or controlled by U-Earth;
- suppliers, agents, sub-suppliers, business partners contractors and sub-contractors and all those who are part of our sales or assistance network or who offer us services of various kinds whose performance requires the processing of personal data. In particular, we use third-party providers to provide you with our newsletter service, to optimize our Services, to manage and maintain the Site and to provide IT and software solutions;
- freelancers or professional firms that assist U-Earth in relation to legal, administrative and/or tax matters, including those of a contentious nature, as well as debt collection companies;
- counterparties in the context of corporate transactions or sales of a company or business unit or of individual corporate assets and entities resulting from the merger or any other form of transformation concerning U-Earth;
- public security and judicial authorities, subjects, bodies or other authorities to whom it is mandatory to communicate your data by virtue of legal provisions or orders of the same authorities.

WHO DO WE TRANSFER YOUR DATA TO ABROAD?

The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

As we are based in the UK we will also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK[/EEA] where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an 'adequacy regulation') further to Article 45 of the UK GDPR.

- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an ‘adequacy decision’) further to Article 45 of the EU GDPR.
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

Where we transfer your personal data outside the EEA we do so on the basis of an adequacy decision or (where this is not available) will carry out this transfer on the basis of the conditions set out in Articles 46 or 47 of the GDPR (adequate guarantees or binding corporate rules) and/or the exceptions referred to in art. 49 GDPR, and will adopt the technical-organizational and/or contractual measures from time to time necessary to ensure a level of protection of your personal data comparable to that guaranteed by the applicable legislation in the EEA. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

HOW LONG DO WE KEEP YOUR DATA?

Your data will be kept for a period of time not exceeding that necessary to pursue the purposes for which it was collected, without prejudice in any case to the exercise of your rights referred to in the next section. In particular, the data processed to send our informative newsletter will be kept as long as the Service is active or as long as the interested party does not request cancellation from the Service.

U-Earth may retain some data even after the termination of the relationship with you relating to the provision of the Services, depending on the time necessary for the management of specific contractual or legal obligations, as well as for administrative, fiscal and/or contributory purposes, for the period of time imposed by laws and regulations in force, as well as for the time necessary to assert any rights in court.

Without prejudice to the foregoing, the data processed for marketing purposes on the basis of consent will be kept for a period of 24 months starting from the date on which the consent was given or renewed.

KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

WHAT ARE YOUR RIGHTS?

You generally have the following rights, which you can usually exercise free of charge:

- **Right of access:** you can ask us for information about the treatments we carry out on your data or for confirmation that U-Earth processes your personal data. In this case, you can ask us to provide you with a copy of your data and check which data is in our possession.
- **Right of rectification:** you have the right to request the rectification of your personal data if they are incorrect, including the right to request the integration of incomplete personal data.
- **Right to erasure:** you have the right to request us to erase the data (or part of it) that you have provided to us, including those which do not need to be kept for the purposes for which the data were collected or otherwise processed.
- **Right of limitation:** you can ask us to limit the processing of your personal data if the legal hypotheses occur.

- **Right to object:** you can object to the processing of your data, without prejudice to the existence of a prevailing legitimate reason for the continuation of such processing.
- **Right to portability:** you can obtain from U-Earth, in a structured format, commonly used and readable by an automatic device, the personal data you have communicated to us, in order to transmit them to another person. This right is applicable in the cases in which U-Earth carries out the processing of such data through automated tools, on the basis of your consent or for the purpose of providing the Services.
- **Withdrawal of consent:** if the processing is based on your consent, you can withdraw it at any time, without prejudice to the lawfulness of the processing carried out prior to said withdrawal.
- **Right to lodge a complaint with the Guarantor:** without prejudice to any other administrative or judicial appeal, you have the right to lodge a complaint with the Guarantor for the protection of personal data in the event that you believe that the treatments carried out by U-Earth violate current legislation regarding data protection.

You can exercise your rights at any time by sending a written communication to legal@u-earth.eu.

Pursuant to article 2-tendencies of the Privacy Code, the rights listed above may be exercised, in the event of death, by those who have an interest of their own, or act to protect you (as your agent, or for family reasons worthy of protection). You can prohibit the exercise of all or some of these rights by the assignees by sending us a written declaration.

DO WE USE COOKIES AND OTHER TRACKING TOOLS?

U-Earth uses identifiers (other than cookies) to carry out activities that are strictly necessary to ensure the proper functioning of the App and the provision of the Services and, therefore, do not require your consent. You can disable these Identifiers by changing the settings on your device, however this may adversely affect basic operational functions or result in the unavailability of the Services.

To allow us to improve the performance and services of our App, we also collect statistical information, in anonymous and aggregate form, in relation to users who access the App and the related methods of use and interaction through the use of other identifiers.

For this purpose, U-Earth uses Firebase Analytics, an analysis service provided by Google Ireland Limited (for an understanding of Google's use of data, please consult Google's partner policies). To allow Firebase Analytics to work, U-Earth uses identifiers for mobile devices or technologies similar to cookies. The User can opt-out from some Firebase functions through the settings of their mobile device

UPDATES TO THIS PRIVACY POLICY

We will periodically update this Privacy Policy to comply with the applicable legislation on the protection of personal data and/or adapt to the adoption of new systems or internal procedures, or in any case for any other reason that makes it appropriate.

The aforementioned changes will be promptly published on the Site and we will notify you with our communication tools. The changes will be binding as soon as they are made known. If you do not want to recognize or accept the changes made to this Privacy Policy, you can exercise one of the rights mentioned above.

We invite you to periodically consult this page.

HOW TO CONTACT US

Individuals in the UK

You can contact us [and/or our Data Protection Officer] by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint. Our contact details are shown below:

Post: U-Store, 172 Fulham Road, SW10 9PR, London, United Kingdom

E-mail: legal@u-earth.eu

Telephone: [+44 20 7341 7492](tel:+442073417492)

Individuals in the EEA

We have appointed our Italian branch to be our data protection representative within the EEA. Their contact details are U-Earth Biotech Ltd (“U-Earth”), C.F. 95209340108 e P.IVA 10920970968P, Via Bandello 16 (20123), Milan, Italy.

Version updated to 06 December 2021.