

Privacy and Cookie 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 policy ("**Policy**"), we wish to provide you with information on (i) the processing operations of your personal data collected through our site u-earth.eu and through our applications for smartphones and tablets (jointly, the "**Site**") and (ii) the use of cookie and other tracking tools through 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 privacy policy is primarily written for adults, including parents and guardians of child users.

Remember that you will be able to use the services made available on our Site ("**Services**") only after having read and accepted the "Terms and Conditions of the Site" ("**General Conditions**")

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

The controller of the processing of your personal data is U-Earth Biotech Ltd ("**U-Earth**"), VAT number GB311666618, incorporated and registered in United Kingdom with no. 11599132 and with registered office in 172 Fulham Road, SW10 9PR London. The use on the Site and in this Policy of expressions such as "we" or "our" shall be meant to refer 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 PROCESS?

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

1) *Navigation data*

Through the Site we acquire some personal data relating to your navigation:

- the IP addresses of the computers and devices used to access the Site 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) *Data regarding the use of the Site*

We collect data relating to your interactions with the Site, such as information regarding the products viewed and/or purchased and/or the Services you have selected, the history of searches carried out, etc.

3) Data provided voluntarily by the user

We may collect the following information, provided by you directly (eg via the online registration form for sending our newsletter or requesting information or assistance):

- name, surname, e-mail address, telephone number;
- identification codes, such as username and password;
- information provided as part of a request for assistance or clarification (reason for contact or complaint, etc.);
- information provided as part of a request for information on our products and / or services, including for example information regarding the user's company and / or sector;
- information provided when participating in user surveys and market surveys.

4) Data of employees and / or collaborators of U-Earth corporate clients

We may also treat personal data (limited to name, surname, profession, telephone number and professional email address) relating to employees and / or collaborators of our corporate clients as an independent owner and in compliance with the applicable legislation ("**Collaborators**"), communicated directly by the latter through the Site or, in any case, in the context of the contractual relationship with U-Earth.

The U-Earth company has the duty to properly inform its Collaborators about the aforementioned treatments.

5) Data collected through cookies and other tracking tools

In the event that you expressly consent to the installation and use of analytical and profiling cookies, we will collect data through the use of cookies, web beacons and other technologies, including advertising data. For more information, please consult our cookie policy, at the bottom of this Policy.

FOR WHAT PURPOSES AND ON WHAT 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 (art. 6, paragraph 1 letter b GDPR).

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 Site;
- verify your identity;
- manage your registration and the account;
- allow you to use, in compliance with the General Conditions, the Services requested from time to time. In particular, we will process your data to send you our newsletter via email, if you have expressly requested it;
- 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;

- contact you, as part of the pre-contractual requests submitted by you through the Site using the appropriate online form, to make an appointment and to give you a free consultation in relation to our products.

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.

In particular, our newsletter information service is aimed at those who have explicitly requested it (by filling out the appropriate registration form or expressing this will in the context of other communications). You can request cancellation from the newsletter service at any time by sending a written communication to the address legal@u-earth.eu or by clicking on the unsubscribe link in each newsletter.

The data processed for this purpose belong to the following categories: navigation data, data provided voluntarily by the user and data of employees and / or collaborators of U-Earth corporate clients.

- (B) To fulfill the legal obligations** to which U-Earth is subject and, therefore, for purposes arising from legal obligations, regulations, European Union legislation, provisions issued by authorities empowered by law or by supervisory and control bodies (art. 6, paragraph 1 letter c GDPR)

We also process your personal data:

- to enable us to act in accordance with applicable legal and/or regulatory obligations;
- to prevent fraud and to enforce and defend the rights of U-Earth;
- manage and response to requests from relevant authorities (administrative, tax and judicial).

Data processed for this purpose belong to the following categories: navigation data, data relating to the use of the Site, data provided voluntarily by the user and data of employees and / or collaborators of U-Earth corporate clients.

- (C) To pursue the legitimate interests** of U-Earth (art. 6, paragraph 1 letter f GDPR)

We also process your personal data:

- 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.

The data processed for this purpose belong to the following categories: navigation data, data relating to the use of the Site and data provided voluntarily by the user.

Any personal data relating to Collaborators provided by one of our corporate clients are also processed by us in order to strengthen and improve the existing contractual relationship. In particular, we process the related personal data to send and / or show these Collaborators marketing communications and / or updates relating to our products and / or Services.

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, or, with specific reference to the receipt of communications by email, by clicking on the unsubscribe link present in each communication.

- (D)** Subject to your express and specific **consent** (Article 6, paragraph 1 letter a UK GDPR and EU GDPR), 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.

his 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, data relating to the use of the Site, data provided voluntarily by the user, data of employees and / or collaborators of U-Earth corporate clients and data collected through the use of cookies and other tracking tools.

TO WHOM MAY WE DISCLOSED YOUR DATA?

Your data may be disclosed to the following categories:

- parent companies and/or associates of and/or controlled by U-Earth;
- suppliers, agents, sub-suppliers, contractors, sub-contractors, business partners 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.

TO WHOM DO WE TRANSFER YOUR DATA 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 EU GDPR (adequate guarantees or binding corporate rules) and/or the exceptions referred to in art. 49 EU 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 RETAIN YOUR DATA?

Your data will not be kept longer than necessary for the purposes for which they were collected, without prejudice in any case to the exercise of your rights under 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 certain data even after the termination of the relationship with you relating to the provision of the Services, for the time required to manage specific contractual or legal obligations as well as for administrative, fiscal and/or contributory purposes, for the period of time required by laws and regulations in force, as well as for the time required to enforce any rights in court.

Notwithstanding the above, data processed for *marketing* purposes on the basis of your consent will be retained for a period of **24 months** starting (i) from the date on which the consent is given or renewed when purchasing a product through the Site, or (ii) from the date of the Last Contact, meaning, by way of example, the access to the Site and/or the interaction with a *marketing* communication sent by U-Earth.

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 request information about the processing we perform on your data or ask for the confirmation that U-Earth is processing your personal data. In this case, you can ask us to provide you with a copy of your data and verify what data are in our possession.

- **Right of rectification:** you have the right to request for the rectification of your personal data if they are incorrect, including the right to request for the integration of incomplete personal data.
- **Right to erasure:** you have the right to request for the erasure of the data (or of part of it) you have provided us, including data that does not need to be stored in relation to the purposes for which the data was collected or otherwise processed.
- **Right to restriction of processing:** you have the right to request us to limit the processing of your personal data if the conditions set out by the law are fulfilled.
- **Right to object:** you have the right to object to the processing of your data, subject to the existence of an overriding legitimate reason to continue such processing.
- **Right to data portability:** you will be able to receive from U-Earth, in a structured, commonly used and machine-readable format, the personal data that you have provided us, in order to transmit them to another party. This right may be exercised in the hypothesis in which CHILI's processing of such data is carried out by automated means, on the basis of your consent or for the purpose of providing the Services.
- **Withdrawal of consent:** if the data processing was based on your consent, you may revoke it at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.
- **Right to lodge a complaint with the Data Protection Authority:** without prejudice to any other administrative or judicial recourse, you have the right to file a complaint to the Data Protection Authority in case you consider that the data processing carried out by U-Earth breaches the current data protection legislation.

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

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?

To make your experience on the Site more user friendly and intuitive and to provide you with a more pleasant and efficient browsing experience, we also use *cookies*, which are small text files sent by the Site to your device ("**Device**") and stored on the latter, to be retransmitted on each subsequent visit.

Types of cookies

Cookies can be classified according to the entity that acts as the controller of the personal data gathered by the *cookie*, distinguishing between *cookies* set directly by the operator of the site visited by the user (so-called first party *cookies*), and third-party *cookies*, meaning *cookies* coming from sites other than the one being browsed. In particular, third-party *cookies* come from external domains and are installed on the Device by third party sites. In the following tables you will find a list of third-party *cookies* used by the Site, with an indication of the *links* to the website of the third party where you can find the privacy policy related to personal data collected through *cookie* and how to deactivate it.

Moreover, *cookies* are usually divided into two macro-categories: technical *cookies* (which includes most of the analytical *cookies*) and profiling *cookies*.

Technical *cookies*

Technical *cookies* are used for the sole purpose of optimizing your web-surfing on the Site and to allow U-Earth to provide the required Services. Technical *cookies* used on the Site can be further divided into:

- **Strictly necessary *cookies***

These *cookies* are strictly necessary to allow your browsing on the Site and for its proper functioning. They do not store personal information and are set only in response to your actions (such as, for example, a request for services, setting *privacy* preferences, logging in or filling out forms).

Navigation *cookies* are normally session *cookies* and, therefore, once the *browser* is closed, they are deleted. You can also set your *browser* to block or warn you about these *cookies*, but as a result some parts of the Site may not work or work incorrectly.

Below is a list of all the navigation *cookies* used by the Site:

Cookie	Type	Origin	Information
XSRF-TOKEN	Essential	Wix	Used for security reasons
hs	Essential	Wix	Used for security reasons
svSession	Essential	Wix	Used in connection with user login
SSR-caching	Essential	Wix	Used to indicate the system from which the site was rendered
_wixCIDX	Essential	Wix	Used for system monitoring/debugging
_wix_browser_sess	Essential	Wix	Used for system monitoring/debugging
consent-policy	Essential	Wix	Used for cookie banner parameters
smSession	Essential	Wix	Used to identify logged in site members
TS*	Essential	Wix	Used for security and anti-fraud reasons
bSession	Essential	Wix	Used for system effectiveness measurement
fedops.logger.sessionId	Essential	Wix	Used for stability/effectiveness measurement

- **Performance or analytical *cookies***

These *cookies* allow us to gather statistical information, in an anonymous and aggregate form, about how many users access the Site and how they use and engage with it. This allows us to improve the products and Services of our Site.

Below is a list of all the analytical *cookies* used by the Site:

Cookie	Type	Origin	Information
_ga	<i>first-party</i>	Google Analytics	Used to distinguish users.
_gid	<i>first-party</i>	Google Analytics	Used to distinguish users.
_gat	<i>first-party</i>	Google Analytics	Used to throttle request rate.
AMP_TOKEN	<i>first-party</i>	Google Analytics	Contains a token that can be used to retrieve a Client ID from AMP Client ID service.

<code><_gac_<prop-erty-id></code>	<i>first-party</i>	Google Analytics	Contains campaign related information for the user
<code>__utma</code>	<i>first-party</i>	Google Analytics	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing <code>__utma</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.
<code>__utmt</code>	<i>first-party</i>	Google Analytics	Used to throttle request rate.
<code>__utmb</code>	<i>first-party</i>	Google Analytics	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing <code>__utmb</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.
<code>__utmz</code>	<i>first-party</i>	Google Analytics	Not used in ga.js. Set for interoperability with urchin.js.
<code>__utmz</code>	<i>first-party</i>	Google Analytics	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
<code>__utmv</code>	<i>first-party</i>	Google Analytics	Used to store visitor-level custom variable data. This cookie is created when a developer uses the <code>_setCustomVar</code> method with a visitor level custom variable. This cookie was also used for the deprecated <code>_setVar</code> method. The cookie is updated every time data is sent to Google Analytics.
<code>__hstc</code>	<i>first-party</i>	HubSpot	The main cookie for tracking visitors.
<code>hubspotutk</code>	<i>first-party</i>	HubSpot	This cookie keeps track of a visitor's identity. It is passed to HubSpot on form submission and used when deduplicating contacts.
<code>__hssc</code>	<i>first-party</i>	HubSpot	This cookie keeps track of sessions.
<code>__hssrc</code>	<i>first-party</i>	HubSpot	Whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser.

- **Functionality cookies**

These *cookies* allow us to provide you with enhanced functionality and customization. In particular, they are used to store some of your preferences and information (e.g. language, country of origin, products selected for purchase) without you having to re-enter them on subsequent visits. Functionality *cookies* are often persistent *cookies*: they remain stored on your Device even after you close your *browser*, until their expiration date or until the user decides to delete them. If you do not authorize these *cookies*, some or all of the Services may not function properly.

Below is a list of all the functionality *cookies* used by the Site:

Cookie	Type	Origin	Information
wixLanguage	Functional	Wix	Used on multilingual websites to save user language preference

Profiling cookies:

Profiling *cookies* are designed to create profiles of the user and are used to send you advertisements in line with your browsing preferences.

These *cookies* may be set through our Site by our advertising partners. They may be used by these companies to build a profile of your interests and to show you relevant ads on other websites.

The use of profiling *cookies* and other tracking tools requires the prior acquisition of your free consent. If you do not consent to the use of these *cookies*, you will not be shown or sent personalized ads, nor will profiles be created based on your interests. On the other hand, refusal or withdrawal of consent will not affect your ability to access or navigate the Site.

Below is a list of all the profiling cookies used by the Site:

Cookie	Type	Origin	Information
__utma	<i>first-party</i>	Google Analytics	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	<i>first-party</i>	Google Analytics	Used to throttle request rate.
__utmb	<i>first-party</i>	Google Analytics	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmc	<i>first-party</i>	Google Analytics	Not used in ga.js. Set for interoperability with urchin.js.
__utmz	<i>first-party</i>	Google Analytics	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	<i>first-party</i>	Google Analytics	Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics.

HOW CAN YOU MANAGE COOKIES?

You may deny your consent and/or change your options regarding the Site's use of *cookies* at any time via the button "Manage Cookies". Please note, however, that disabling certain types of cookies may affect your navigation on the Site and the use of its Services.

You can remove existing *cookies* and block the installation of new *cookies* through your *browser* settings. With particular reference to third-party *cookies*, please note that, if you have already given consent, you must delete them through the *browser* or by requesting the *opt-out* directly to the third parties or through the site: <http://www.youronlinechoices.com/it/le-tue-scelte>.

The procedure for managing your preferences in relation to *cookies* is different for each *browser*. Below are the instructions for the most common *browsers*:

#	Browser
	Edge
	Chrome
	Opera
	Safari
	Firefox

UPDATES TO THIS POLICY

We will periodically update this *privacy* and *cookie* Policy in order to comply with the applicable data protection legislation and/or to adapt to the adoption of new internal systems or procedures, or for any other appropriate reason.

Such changes will be promptly published on the Site and we will inform you about them with all our communication tools. The changes will be binding as soon as they are published. If you do not wish to acknowledge or accept the changes to this Policy, you may exercise any of the rights mentioned above.

Please check this page periodically. Version updated as of 19/09/2022.