

ufirst Users' Privacy Policy

Version U1/07/2021/PP/EN

U-First S.r.l. - with a registered office in Via Giovanni Amendola n. 46 – 00185 Rome (Italy) - , Fiscal Code, VAT number 12753241004, R.E.A. n. RM-1397673, fully paid-up share capital of Euro 237.866,00, (the “**Company**” and/or “**uFirst**”) pursuant to Sections 13 and 14 of the EU Regulation 2016/679 (the “**Regulation**”), hereby provides the following privacy policy, acting as the controller of the personal data of the users (the “**Users**”) who intend to register or are already registered to the ufirst platform through the website www.ufirst.com (the “**Website**”) or the U-First application for mobile devices (the “**App**”).

This privacy policy is provided to the Users in addition to the U-First Website Privacy Policy.

1. What personal data do we process and how we obtain it

The personal data we collect when you register with the App or the Website is your name, or the nickname you choose to use for the uFirst service, and your email address. When you use the services of the App, we collect information about your booking or reservation, including but not limited to the operator you selected, the type of service you requested, the date and time of your booking or reservation.

However, you may be asked to provide further personal data for the use of the service by certain operators and that these operators require and process as independent data controllers. For example, we may ask for your telephone number if the operator asks for it in order to facilitate communication between you and the operator; your student ID number if you are booking a service at a university in order to provide an effective system for handling your application; an identification code given to you by the operator; your telephone number so that the operator can contact you for service announcements. We may also process your personal data contained in communications with uFirst, when you decide to contact the Company through the channels made available by the same.

All this data is provided directly by you.

Access via social network or Apple - Cookies used

When you register with ufirst through a social network, we will only receive certain personal data from the relevant social network operator that is necessary to pre-fill the registration form. If you subsequently log in to the App or Site using your social network credentials, we will ask the social network operator to confirm that your credentials are correct. Before logging in using the social networking buttons, please read the social networking providers' policy on the use of these cookies. If you do not want to receive these cookies, please register on ufirst without using the social media buttons. Here are the cookies associated with social networks that are used on ufirst, with links to the information pages created by their owners:

Facebook Login	Third party technical authentication cookie. Permanent	https://it-it.facebook.com/help/330229433729799/
Apple Login	Third party technical	https://www.apple.com/le

	authentication Permanent	cookie.	gal/privacy/it/cookies/
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To disable these cookies, please refer to the privacy policies of the social networks you use to log in. If you disable third-party cookies, you will no longer be able to log in to ufirst via social networks.

In addition, if you access uFirst through Facebook, Facebook, as an autonomous data controller, may collect or receive information from your App in order to provide measurement services and targeted advertisements. You can find out more about how to access and delete the information collected by Facebook by accessing your Facebook settings.

You may also access and sign up for uFirst through your Apple ID, in which case, you may: choose to share your email with us or choose to hide it, in which case Apple will share with us a random, unique email address that can only be used for communications from us.

2. Data processing purposes

The personal data of the Users will be processed by the Company for the following purposes

- a) fulfilment of contractual obligations (art. 6, co. 1, lett. b) of the Regulation), i.e. to allow the User to register on the Site and the App and to execute the Terms and Conditions with uFirst or to fulfil, prior to the conclusion of such Terms and Conditions, specific requests of the User;
- b) fulfillment of legal obligations (art. 6, co. 1, letter c) of the Regulation), to fulfill obligations provided for by law, regulation or European legislation.
- c) pursuit of the legitimate interest to answer questions and requests of the Users who contact the Company using the contacts published on the Site or on the App (art. 6, co. 1, letter. f) of the Regulation) or to obtain statistics, also through the use of aggregate data, on the use of our App and of our service and/or to pursue our legitimate interest to exercise or defend a right in court;
- d) with your optional consent some personal data will also be processed for marketing, profiling, geolocation purposes, transfer to third parties, such as, for example, the Operators where the User used the uFirst service.
- e) in the context of the COVID-19 health emergency, we may process your data to protect a vital interest of yours as well as to pursue your legitimate interest in receiving information regarding your reservation to vaccination services offered by the National Health Service. Such processing is also justified by the need to comply with a request received from a public authority, for the pursuit of a public interest and for the humanitarian purpose of controlling the spread of the epidemic (C. 46 of the Regulation, art. 6, co. 1, lett. d and f).
- f) with your consent some personal data falling into the special categories of personal data (art. 9 of the Regulations), specifically the data concerning the health status of the User,

will be processed for the management of requests made by the User to book appointments for vaccination for COVID-19. Consent to the processing of personal data for this purpose is optional, but failure to provide such consent will make it impossible for the User to use the Website and/or the App to book appointments for the vaccine.

The provision of personal data for the processing purposes indicated in letters a), b), c) and e) is optional but necessary, since failure to provide such data will make it impossible for the User to register with uFirst via the Website and/or the App.

3. Other processing purposes: marketing and profiling

With the optional consent of the User (art. 130 of Legislative Decree 196/2003; art. 6, co. 1, let. a) of the Regulation), which can be expressed by checking the appropriate box during registration on the Site and/or the App, the User's personal data (name or nickname and e-mail address) may be processed by the Company for (i) marketing purposes through e-mail, as well as for sending notifications to the device on which the User has installed the App and/or (ii) for profiling purposes, i.e. to track back the User's tastes and consumption habits, identifying the User's consumer profile, in order to be able to offer a personalized way of participating to the ufirst eco-system and send the User commercial offers consistent with the identified profile. Consent to the processing of personal data for both marketing and profiling purposes is optional, and if consent is not given, the possibility of registering with ufirst and using the Website and/or the App will not be affected in any way. Even in the case of consent, the User may revoke it at any time, freely and free of charge, by making a request to the Company in the manner indicated in paragraph 9 below, or change their preferences through the settings on the App and/or the Website. In relation to the consent for marketing activities, the User may revoke his consent also selectively, opposing, for example, the further sending of promotional communications by e-mail but continuing to receive SMS or notifications, or vice versa. Promotional communications sent by email are managed by the Company directly or by an external provider who acts as a data processor on behalf of uFirst. The User may also revoke his or her consent to the processing of his or her email address for marketing purposes by clicking on the opt-out link in each marketing email. If you do not consent to the processing of your personal data for marketing purposes, your personal data will be processed by the Company only for any service communications necessary for the use of uFirst. Withdrawal of consent does not affect the legitimacy of the data processing carried out up to the moment of withdrawal on the basis of the consent previously given, nor the right to the further processing of such data on another legal basis, for example to comply with legal obligations.

4. Other processing purposes

TRACKING. The Company may process the Users' personal data, including their IP addresses and their browsing data on ufirst, for the purpose of pursuing a legitimate interest (in accordance with Section 6, paragraph 1, letter f) of the Regulation and Section 24, paragraph 1, letter g) of the Privacy Code), that is to collect statistical information, to perform analysis on the App usage, or to improve the Users' experience on ufirst. To this end, the Company uses the tools provided by third-party suppliers, in their quality of processor of the personal data. The Users may opt-out at any time from the tracking, by contacting U-First as indicated in paragraph 8 below. Data will be retained by the Company for a maximum of a 12-month period or for the different time period allowed from time to time by the applicable privacy law. Log data will be stored for six months.

GEOLOCALIZATION In order to take full advantage of the features of the App and/or the Website, the User may, at his or her discretion, activate the geolocation function, which will allow ufirst to identify the User's geographical location and indicate to him or her, in real time, the nearest shops and operators at a given time, where the ufirst service is active. If the geolocation function is not activated or deactivated, the possibility of using the App and the Website may not be optimal, but their use will not be affected in any way.

The User can activate geolocation by clicking on the appropriate symbol next to the string in which it is possible to enter the city of interest.

If the geolocation function is activated, we use the geolocation data existing on the mobile device or generated through the use of the features of the devices used by the User to show the customer the closest operators using uFirst, according to the option chosen by the User: through the pop up, the User can choose whether (i) to allow uFirst to use its location only at that moment, for the time necessary to show the customer the closest operators using uFirst, or (ii) to allow uFirst to use its location when using the App, or (iii) not to allow uFirst to use its location.

Geolocation data is not retained. Use of the App and/or the Website is possible without access to this data. Access can be deactivated and reactivated at any time via the phone's settings. Consent to geolocation is optional and its revocation does not affect the legitimacy of the data processing carried out up to the time of revocation based on the consent previously given, nor the right to further processing of such data on another legal basis, for example to comply with legal obligations.

5. Processing means and storage

The processing of the Users' personal data will be carried out by electronic and non-electronic means, with logics strictly related to the purposes of the processing. Specific security measures are observed to prevent the loss of data, unlawful or incorrect use and unauthorized access.

If you have contacted us by letter or e-mail to obtain information about ufirst and the services we offer, your data will be stored for a maximum of 60 days from the day on which we provided you with the requested information, unless further storage of the data is necessary to comply with legal obligations or to exercise or defend our rights in court.

Your data collected when you register with ufirst will be retained for as long as your account remains active and will be deleted immediately after you close your account, unless applicable law requires longer retention, in which case we will retain your data for the additional period of time permitted by applicable law.

Additional data that is requested from time to time by the Operator to enable you to use the ufirst service at their premises, as well as data relating to bookings and tickets taken out, will be retained for twelve months following the period corresponding to the contractual term with the Operator for which such additional personal data was processed or in any case for a period not exceeding ten years; at the end of this period it will be processed in aggregated form for statistical purposes.

With regard to processing carried out on the basis of consent, personal data will be processed until the User revokes consent to the processing of his data for such purposes.

6. Persons who may have access to the data

The personal data of the Users may be disclosed to the employees and/or collaborators of the Company in charge of managing and maintaining the Site or the App. These subjects, who are formally designated by the Company as "authorized persons", will process the User's data exclusively for the purposes indicated in this privacy policy and in compliance with the provisions of the Regulation.

Furthermore, Users' personal data may be disclosed to third parties who may process personal data on behalf of the Company as "data processors", such as, for example, IT and logistic service providers operating the Website or the App, outsourcing or cloud computing service providers, professionals and consultants, companies in charge of marketing activities on behalf of the Company. The Users have the right to obtain a list of the Company's data processors, if any, by making a request to the Company in the manner indicated in paragraph 8 below.

Users' personal data may be communicated to the Operators where the User used the uFirst service in order to allow the latter to provide the relevant service or to provide it more efficiently. In this case, the Operator will process personal data as an independent data controller.

In relation to the processing and purposes referred to in paragraph 2, letter (e), the data may be communicated to public Operators or private Operators acting on behalf of public Operators who request it. In this case, these Operators will process the personal data as autonomous data controllers.

7. Data transfer outside the European Economic Area

Some of our IT service providers are located outside the European Economic Area. In particular, we use servers that are located (i) in the United Kingdom based on the adequacy decision issued by the European Commission on July 28th 2021; (ii) to the United States, where the transfer is made on the basis of standard contractual clauses (Commission Implementing Decision (EU) 2021/914 of June 4th 2021); and (iii) to the Republic of Ecuador, where the transfer is made on the basis of standard contractual clauses (Commission Implementing Decision (EU) 2021/914 of June 4th 2021).

UFirst has carried out a prior study and analysis of the U.S. legislation on the processing of personal data to ensure that the United States complies with the obligations prescribed by the model contractual clauses and offers an adequate level of protection of uFirst Users' personal data.

We will also continue to monitor the evolution of systems for international data transfers under the Regulation and we are committed to conducting data transfers in a lawful manner in accordance with applicable data protection laws from time to time.

8. User's rights

Pursuant to Section 7 of the Italian Privacy Code, the Company hereby informs the Users that they have the right to obtain confirmation as to whether or not personal data concerning them exist, regardless of their being already recorded, and communication of such data in intelligible form. Users also have the right to be informed (i) of the source of the personal data; (ii) of the purposes and methods of the processing; (iii) of the logic applied to the processing, if the latter is carried out with the help of electronic means; (iv) of the identification data concerning data controller and data processors; (v) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may have access to said data in their capacity as data processor(s) or person(s) in charge of the processing. Furthermore, Users have the right to obtain a) updating, rectification or, where they have an implied interest, integration of the data; b) deletion, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected. Users have the right to object, in whole or in part, a) on legitimate grounds, to the processing of their personal data, even though they are relevant to the purpose of the collection; b) to the processing of their personal data, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys. The Users will be able to exercise the following rights set forth in Sections from 15 to 22 of the same: the right of access to their personal data (i.e. the right to obtain from the Company confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the information set forth in Section 15 of the Regulation); the rights to rectification (i.e. the right to obtain from the Company the rectification of inaccurate personal data or the right to have incomplete personal data completed); the right to erasure (i.e. the right to obtain from the Company the erasure of personal data concerning them where one of the grounds indicated in Section 17 of the Regulation applies); the right to restriction of processing where one of the grounds indicated in Section 18 applies; the right to data portability (i.e. the right to receive personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance). The Users also have the right to withdraw their consent at any time. The consent withdrawal will not affect the validity of the processing based on their consent before the withdrawal. The Users have the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them pursuant to Section 6, paragraph 1, letter e) or f) of the Regulation, including profiling based on these provisions. Should their personal data be processed for direct marketing purposes, they have the right to object to the processing of personal data concerning them at any time, including the profiling to the extent that it is linked to such direct marketing. The above-mentioned rights can be exercised by contacting the Company by (i) registered mail to the address “*Via Giovanni Amendola n. 46, 00185 Rome (Italy), to the attention of the Data Protection Officer*” or (ii) email to the email address privacy@ufirst.com or (iii) lodging a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*) (www.garanteprivacy.it). uFirst has appointed a Data Protection Officer pursuant to section 37 of the Regulation. The DPO can be contacted for all privacy-related issues at privacy@ufirst.com.