



PRIVACY POLICY AND COOKIE POLICY

made pursuant to art. 13 and 14 of EU REGULATION N. 2016/679 ("GDPR")

The objective of UCapital24 S.p.A. (the "**Company**," the "**Data Controller**", or "**We**") is to connect all economic and financial operators and business users on a global scale by serving as an "aggregator" between supply and demand and making available through the web platform of the same name fintech services and content, including an innovative platform, also usable through an App, which enables UCapital24 to be positioned in the market as the world's leading Social Media fintech company.

The company UCapital24 S.p.A. is listed on Euronext Growth Milan and with the Investor Relations website it intends to provide all information about the financial performance of the company and the main operations it carries out. Correct IR activity requires timely communications about any news that may influence the market's evaluation of the company. The legislation provides for a series of mandatory communications, but the market requires much more and this is why UCapital24 carries out all the necessary communications so that there is full transparency and timeliness in communicating the management's choices.

In this context, with this Privacy and Cookie Policy the Data Controller, committed to protecting the privacy of the interested parties, intends to provide them with information regarding the processing of their personal data, as defined below, collected and processed through the site <https://investor.ucapital24.com/>.

Where not otherwise specified, this *Policy* applies as a disclosure - pursuant to Articles 13 and 14 of Regulation (EU) No. 2016/679 (hereinafter the "**GDPR**") - made to those who interact with the above site ("**Users**", "**Interested Parties**", or "**You**").

2. Data controller. Data Processors.

In relation to the personal data collected that is the object of this Privacy Policy, the Data Controller is **UCapital24 S.p.A.**, with registered office at Via dei Piatti 11, 20123, Milan (MI), C.F. and P.IVA 10144280962, e-mail privacy@ucapital24.com. The updated list of data processors is available upon request at the Data Controller's office.

3. Data Protection Officer.

The Data Controller has appointed a Data Protection Officer ("DPO" or "RDP"), pursuant to Article 37 of the GDPR, who is responsible for supervising compliance with data protection regulations and acting as a point of contact for data subjects and who can be contacted for any needs pertaining to the processing of personal data by writing to the following e-mail address: dpo@ucapital24.com.

4. Categories of personal data processed, source from which they originate, and why we use Data Subjects' data. Purposes and legal basis of the processing. Consequences if data is not provided.

Following is a list of all the *purposes* for which we collect personal data from Users of the sites and App covered by this policy, *legal basis* of processing and *Legitimate interests* pursued.

Personal data collected will be processed:

a) For browsing the websites and activities related to its functioning and operation:

1. **Purposes of processing:** to enable web browsing and, in the case of computer crimes, to ascertain possible liability.
2. **Processed data:** The computer systems and software procedures responsible for the operation of the web page acquire, in the course of their normal operation, some personal data whose transmission is

implicit in the use of Internet communication protocols. This category of data includes IP addresses, domain names, URIs. Regarding the App the data collected are the following: connection time, how many sessions the User has active, first connection, device name, unique Id of the User to generate notifications, app version, language.

3. Legal basis:

- i. provision of services aimed at enabling Users to browse the sites, execution of contractual or pre-contractual measures pursuant to Art. 6 c. 1 lett. b) of the GDPR;
- ii. legitimate interest consisting in ensuring the proper functioning of computer systems and to proceed with the investigation of possible crimes (possibly also based on the existence of a legal obligation) pursuant to Art. 6 c. 1 lett. f) of the GDPR.

4. Retention period: 30 days after the date of collection, unless legal provisions or orders of Public Authorities impose a different retention time in connection with investigations related to possible computer crimes.

5. Provision of personal data: the provision of data is mandatory for the pursuit of the legitimate interests of the Data Controller indicated in the points above. Failure to provide it will result in the impossibility of following up on the User's requests and carrying out the activities indicated above.

b) Filling out forms:

- 1. Purposes of processing:** by filling in forms within the websites, Data Subjects may, depending on specific indications, obtain information about the services provided by the Data Controller or request to be contacted.
- 2. Data processed:** first name, last name, e-mail, telephone number and text message.
- 3. Legal basis:** execution of the contract of purchase and sale of products or pre-contractual measures taken as a result of a request from the data subjects pursuant to Article 6, c.1, lett b) of the GDPR.
- 4. Retention period:** two years after completion of the form.
- 5. Provision of personal data:** The provision of personal data is optional, but necessary to handle and process requests from Interested Parties. Failure to provide the data will result in the inability of the Data Controller to handle the requests of the Interested Parties. It should be noted that the telephone number is always optional proviso (it is infact not marked with the red asterisk which indicates data that must be provided).

c) Proximity marketing (soft spam) to its customers/users:

- 1. Purpose of processing:** for the Data Controller to send information via e-mail (not ofr telephone communications) for informational/promotional purposes of products and/or services provided by the Data Controller (and not by third parties) regarding services similar or related to those already purchased or for which the User has registered or shown interest (so-called "soft spam").
- 2. Data processed:** contact data such as first name, last name, e-mail.
- 3. Legal basis:** If the data subject is already a customer of the Data Controller, or has registered or demonstrated interest in certain services and there is a balance of interests, or has created an account on the Social UCapital, the legal basis may consist of the legitimate interests of the Data Controller (pursuant to Art. 6 c. 1 lett. f) of the GDPR) and therefore consent is not required for sending occasional advertising communications.
- 4. Retention period:** for the duration of the cotractual relationship with the customer or as long as the User has the active account within the Social UCapital or until the User who has demonstrated interest in a service or product does not exercise the right to object to the processing of his/her personal data for marketing purposes.

5. **Provision of personal data:** the provision of data is optional. Failure to provide data will have no consequence on the usability of the services and it remains at the complete discretion of the User to decide to object to the processing of their personal data for marketing purposes.

d) **Legal obligations to which the Data Controller is subject:**

1. **Purpose of the processing:** to fulfill legal obligations to which the Data Controller is subject (e.g. accounting, tax, administrative) or to protect the security of Users, of the Data Controller itself or third parties.
2. **Processed data:** any acquired data of Users that is necessary for the Controller to fulfill the legal obligations to which it is subject or the defensive needs referred to above.
3. **Legal basis:** the processing is necessary to fulfill a legal obligation to which the Data Controller is subject pursuant to Article 6, c. 1, lett. c) of the GDPR.
4. **Retention period:** the Data Controller will process the Personal Data of the data subjects for the time strictly necessary to achieve the aims stated in the purposes.
5. **Provision of Personal Data:** the provision of data is mandatory in order to comply with legal obligations of the Data Controller indicated in the points above. Failure to provide it will make it impossible for the Data Controller to carry out the activities indicated above.

e) **Anti-fraud and ascertainment, exercise or defense of a right:**

1. **Purpose of the processing:** for the establishment, exercise or defense of a right of the Data Controller, including in court.
2. **Processed Data:** It is not required new and specific provision of Personal Data, as the Data Controller will pursue this additional purpose by processing, where necessary, the Personal Data already collected.
3. **Legal basis:** legitimate interest in order to ensure the establishment, exercise or defense of a right of the Data Controller pursuant to Article 6(f) of the GDPR.
4. **Retention period:** two years following the collection of the data or for the duration of any judgment.
5. **Provision of personal data:** it is mandatory for the pursuit of the legitimate interests of the Data Controller indicated in the points above. Failure to provide it will result in the impossibility of carrying out the activities indicated above.

4. Recipients and possible categories of recipients of personal data.

Personal data may be made accessible to, brought to the attention of, or communicated to the following parties, who are appointed by the Data Controller, as appropriate, as data processors or persons authorized to process data, or act as autonomous data controllers:

- employees and/or collaborators in any capacity of the Data Controller duly authorized and trained in accordance with the provisions of the GDPR;
- suppliers and partners of the Data Controller who provide services and all activities related to the Sites/Apps, IT service providers etc. appointed as data processors, through the signing of a contract;
- freelancers and consultants for the purposes of legal, financial and accounting management of the Data Controller's activities (such as accounting, administrative, legal operators etc.) and credit institutions and insurance companies, acting as autonomous data controllers;
- public authorities or police forces, in cases where access to the data is recognized by provisions of law, regulation or EU legislation.

5. Transfer of data to countries outside the European Union:

The recipients referred to in 4 above are established and process data within the European Union and no data transfers are made to non-EU countries.

In this last regard, please note that the site covered by this policy currently use analytics cookies from Google Ireland Ltd. Any data transfers to the United States enjoy the legal basis of Article 45 of the GDPR, an adequacy decision having

entered into force in July 2023 with respect to the United States which provides for the possibility of transferring data to U.S. companies that have undergone the required certification mechanisms. Google holds all the required and necessary certifications in order to be able to carry out the data transfer in compliance with the applicable regulations. Lastly, it is specified, as further discussed below, that such cookies will be subject to consent by Users.

6. Cookie

Cookies are small text files that the sites visited send to the User's terminal, where they are stored, and then re-transmitted to the same sites on the next visit. Cookies allow sites to function correctly and efficiently to improve the user experience, allowing the relevant site from time to time to store information in the memory of the computer or other devices. Thanks to cookies it is therefore possible to collect information regarding Users's online browsing and use them to facilitate or personalize the browsing experience.

Classification of cookies:

Cookies can be classified in different ways: depending on the site that generates them, depending on their duration and depending on their purpose of use.

- *Classification of cookies depending on the site that generates them:*
 - First Party Cookies: they are generated by the site the User is visiting and only that site can read this data.
 - Third Party Cookies: they are generated by other sites, outside of the one the User is visiting. When the User visits a page on a site, he may encounter content inserted by external sites such as Facebook, Twitter, You Tube, Vimeo or others, and these sites may generate cookies. The site covered by this policy has no control over them. Users are asked to check these sites and their Privacy Policies.
- *Classification of cookies according to their duration:*
 - Temporary (or session) cookies: they do not have an expiry date, and are deleted as soon as the browsing session ends or the browser is closed.
 - Persistent cookies: they have an expiry date and remain on the computer even when the browsing session ends or after closing the browser. They can be read by the site that created them on subsequent visits to the same site.
- *Classification of cookies according to their purposes of use:*
 - Technical cookies
 - Profiling cookies
 - Analysis cookies

In detail, combining the classifications we have:

- First-party Technical Cookies: This type of cookie allows the correct functioning of some sections of the Site. They are of two categories, temporary (or session) and persistent (see above). These cookies are necessary to correctly view the site and in relation to the technical services offered, they will therefore always be used and sent, unless the visitor changes the browser settings (with the possibility, however, of not making the most of or making some services unusable). Technical cookies are those used for example to authenticate, to use multimedia content such as flash players or to allow the choice of navigation language. In general, it is not necessary to obtain the User's prior and informed consent. The legal basis that allows their use is the legitimate interest of the Data Controller in the regular functioning of the website. Furthermore, analytical cookies through which the Data Controller becomes aware exclusively of statistical information, collected in aggregate form, relating to the number of visitors and how they use the website are also assimilated to technical cookies. If the information is not collected in aggregate form and instead includes identifying data (for example,

the IP address used by the non-anonymized user's device), the cookies used to collect this additional data will be qualified as "profiling cookies", active only with the user's consent.

- Technical Cookies to integrate third-party functions: This type of cookie integrates functions developed by third parties within the site pages such as icons and preferences expressed in social networks for the purpose of sharing site contents or for the use of services third-party software (such as map generation software and other software that offers additional services). These cookies are sent from third-party domains and partner sites that offer their functionality on the site's pages.
- Analysis cookies of third-party services: These cookies are used to collect information on the use of the site by Users: pages visited, time spent on the site, origins of the traffic of origin, geographical origin, age, gender and interests for the purposes of marketing campaigns. These cookies are sent from third-party domains external to the site and according to current legislation they can be assimilated to technical cookies "if tools are adopted that reduce the identification power and the third party does not cross-reference the information collected with other information it already has", otherwise they are assimilated to profiling cookies.
- Profiling cookies: These are those cookies necessary to create user profiles in order to send advertising messages in line with the preferences expressed by the user within the pages of the site. This type of cookie is currently not operational within the Sites in question.
- social widgets and plugins: some widgets and plugins made available by social networks may use their own cookies to facilitate interaction with the reference site;

Technical cookies do not require the acquisition of a prior and informed consent from the User for their enabling. The legal basis that allows their use is the legitimate interest of the Owner in the regular functioning of the website.

As regards **non-technical cookies**, the User will be asked for **prior consent** upon first access, by selecting the settings from the cookie banner. Without this consent, cookies cannot be enabled on the User's device, who can manage his preferences at any time. Any consent given to the use of cookies is valid for 6 months, after which the cookie banner will be shown again to renew your preferences.

List of cookies used on the sites and apps covered by this policy which require prior consent from the User to enable them.

Consent is required for the following cookies, without which they will not be enabled on Users' devices. For each of them the following data is reported: source, cookie name, type, duration and purpose.

Source	Cookie's Name	Type of Cookie	Duration	Purpose
Google	_ga_*	Analytics	1 year 1 month 4 days	Google Analytics sets this cookie to store and count page views.
Google	_ga	Analytics	1 year 1 month 4 days	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly

				generated number to recognise unique visitors.
WPML	wp-wpml_current_language	Functional	session	WordPress multilingual plugin sets this cookie to store the current language/language settings.
YouTube	yt-remote-device-id	Functional	Never Expires	YouTube sets this cookie to store the user's video preferences using embedded YouTube videos.
YouTube	LAST_RESULT_ENTRY_KEY	Functional	Never Expires	ytidb::LAST_RESULT_ENTRY_KEY is used by YouTube to store the last search result entry that was clicked by the user. This information is used to improve the user experience by providing more relevant search results in the future.
YouTube	yt-player-headers-readable	Functional	Never Expires	yt-player-headers-readable cookie is used by YouTube to store user preferences related to video playback and interface, enhancing the user's viewing experience.
YouTube	yt-remote-connected-devices	Functional	Never Expires	YouTube sets this cookie to store the user's video preferences using embedded YouTube videos.
YouTube	yt-remote-session-app	Functional	Duration session	The yt-remote-session-app cookie is used by YouTube to store user preferences and information about the interface of the embedded YouTube video player.
YouTube	yt-remote-cast-installed	Functional	Session	The yt-remote-cast-installed cookie is used to store the user's video player preferences using embedded YouTube video. Cookie.
YouTube	yt-remote-cast-available	Functional	Session	The yt-remote-cast-available cookie is used to store the user's preferences regarding whether casting is available on their YouTube video player.
YouTube	yt-remote-session-name	Functional	Session	The yt-remote-session-name cookie is used by YouTube to store the user's video player preferences using embedded YouTube video.
YouTube	yt-remote-fast-check-period	Functional	Session	The yt-remote-fast-check-period cookie is used by YouTube to store

				the user's video player preferences for embedded YouTube videos.
YouTube	YSC	Advertisement	Session	Youtube sets this cookie to track the views of embedded videos on Youtube pages.
YouTube	VISITOR_INFO1_LIVE	Advertisement	6 months	YouTube sets this cookie to measure bandwidth, determining whether the user gets the new or old player interface.
YouTube	VISITOR_PRIVACY_METADATA	Advertisement	6 months	YouTube sets this cookie to store the user's cookie consent state for the current domain.
YouTube	yt.innertube::requests	Advertisement	Never Expires	YouTube sets this cookie to register a unique ID to store data on what videos from YouTube the user has seen.
YouTube	yt.innertube::nextId	Advertisement	Never Expires	YouTube sets this cookie to register a unique ID to store data on what videos from YouTube the user has seen.

How to disable cookies via browser configuration:

In general, cookies can be disabled by the User by checking and/or modifying the settings of their browser based on the instructions made available by the respective providers at the links indicated below:

- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)
- [Opera](#)

More information on cookies is available at <http://www.youronlinechoices.com/it> .

7. Rights of the Interested Parties.

The Interested Parties may exercise the rights that the Gdpr guarantees, as set forth in Articles 7, c. 3, and 15 et seq. by sending an e-mail to privacy@ucapital24.com , or, alternatively, a communication by registered letter with return receipt to the headquarters of UCapital24 at Via dei Piatti 11, 20123, Milan (MI).

The Data Subject may, in particular, exercise the following rights:

- **Right of access:** to obtain confirmation of the existence or otherwise of the processing of personal data concerning him/her and the purposes of such processing, to obtain copies of the data and information on: the origin of the data, the categories of data processed, the recipients of the data, the purposes of processing, the existence of automated decision making (including profiling), the period of data retention and the rights provided by the GDPR;
- **Right to obtain rectification** of inaccurate personal data and **supplementation** of incomplete personal data;

- **Right to obtain the deletion of personal data**, if any of the conditions set forth in Article 17 of the GDPR exist, in cases where the data were no longer necessary or the Data Controller no longer had the authorization to process them;
- Right to obtain the limitation of the processing of personal data, pursuant to Article 18 of the GDPR, in the following cases: 1. if the accuracy of the data is contested, for the time necessary to verify the accuracy of the data; 2. In the event that the data controller is no longer authorized to process the data, it is possible to request the restriction of the processing alternatively to deletion ; 3. If the data is no longer necessary for the data controller but is necessary for the data subject for the establishment, exercise or defense of a right in court;
- **Right to data portability**, if the conditions set forth in Article 20 of the GDPR are met, i.e., to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and to request its transmission to another data controller, if technically feasible;
- **Right to revoke consent** for processing based on it, without affecting the lawfulness of the processing based on the consent given before revocation. Consent can be revoked by writing an e-mail to privacy@ucapital24.com .
- **Right to object to processing in pursuit of the legitimate interest of the Data Controller**. Each Data Subject has the right to object at any time to the processing of his or her personal data carried out in pursuit of a legitimate interest of the Data Controller. In the event of opposition, personal data will no longer be processed, unless there are legitimate grounds for processing that override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of a legal claim.

Right to file a complaint with the Guarantor.

Each Data Subject may lodge a complaint with the Guarantor for the Protection of Personal Data if he or she believes that his or her rights under the GDPR have been violated, in the manner indicated on the website of the Guarantor for the Protection of Personal Data.

11. Changes to this policy

This policy may be subject to updates or changes (including due to new legislation or regulations) for that reason Users are encouraged to check this document regularly. Substantive changes will in any case be highlighted through the website or, if possible, notified by e-mail.

Last revision date: 18/11/2024