

PRIVACY NOTICE FOR WEBSITE USERS

According to Article 13 of the Regulation (EU) 2016/679 ("GDPR") General Data Protection Regulation

DATA CONTROLLER

Morecognition s.r.l.

VAT No. 11628590017

Registered office: Piazza Carlo Felice, 7, 10121 Torino (TO)

Data Controller's e-mail: privacy@morecognition.com

In accordance with Art. 13 of the Regulation 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 and on the free movement of such data (hereinafter "GDPR"), Morecognition s.r.l. (hereinafter referred to as the "Data Controller" or "Morecognition"), as the Data Controller, hereby informs you (hereinafter referred to as the "User") that your personal data will be processed for the following purposes and in the following manner:

1. Types of data collected

The Data Controller processes the User's identification data and usage data collected during the User's navigation through the Data Controller's website (hereinafter referred to as the "Website"). The Data Controller's website can be reached at <https://www.morecognition.com/> (hereinafter referred to as the "Personal data" or "Data").

The information relating to the network used by the User (e.g., IP address) may also be collected and processed by the Data Controller.

2. Purposes and legal basis of processing

Your Personal data will be processed for the following purposes:

- a. Allowing the User to send messages to the Data Controller by sending an email (Data will not be processed directly through interaction with the website);
- b. Acquiring statistics and metrics to ensure the proper functioning of the Website;
- c. Exercising the rights of the Data Controller (e.g., data processing for exercise or defence of legal claims)

The legal basis for the data processing is the following:

- With regard to the purpose (a), the processing is necessary for the performance of a contract to which the User is party to or in order to take steps at the User's request prior to entering into a contract;
- With regard to the purposes (b) and (c), the legitimate interest of the Data Controller, specifically, monitoring the proper functioning of the Website and processing personal data where necessary for the establishment, exercise, or defense of legal claims, constitute the legal basis for the processing of personal data.

3. Retention time

The Data Controller will store and process Personal data for the period of time necessary to fulfill the purposes specified in this Privacy notice. Your data will not be retained for a longer period of time unless required by current law to extend the retention period. The Italian Civil Code requires the storage of all documents of commercial or legal relevance for a period of 10 years. Personal data can also be stored for the duration necessary for the establishment, exercise, or defense of legal claims.

4. Disclosure of personal data

The User's personal data will not be disseminated but may be made accessible, when necessary, for the provision of services or to fulfill statutory obligations, to the following recipients:

- employees or collaborators of the Data Controller in Italy or abroad, in their capacity of subjects authorized to process Personal data and/ or system administrators;
- third-party companies or other subjects (e.g., credit institutions, IT consultants, etc.) which carry out activities in outsourcing on behalf of the Data Controller, in their capacity of Processors.

The Data Controller may communicate your Personal data for the purposes established by Art. 2 of the present Privacy notice to supervisory authorities, legal authorities, public authorities to which it is obligatory to communicate the Data, as well as to those subjects to which the communication is obligatory by law for the fulfillment of the above-mentioned purposes.

5. Transfer of personal data

The Personal data will be stored on servers located within the European Union and managed by third-party companies duly appointed as Processors.

The Data Controller may transfer the User's Personal data to a third country. The data will be transferred exclusively to countries considered "adequate" and therefore, "safe" by the European Commission or to the companies which ensure appropriate safeguards pursuant to Articles 44-50 of the GDPR.

6. Users Rights

You may exercise the rights granted by the GDPR (articles 15-22), including:

- a. The right to receive confirmation as to whether the Data Controller is processing the User's Personal

- data (access rights);
- b. The right to update, modify and/ or correct Personal data (right of rectification);
 - c. The right to request the erasure of data or the restriction of the processing. This right can be granted if the process is unlawful or the Data Controller no longer needs the Personal data for the purposes of the processing (right to be forgotten and right to restriction of processing);
 - d. The right to oppose to the processing (right of opposition);
 - e. The right to propose a complaint to the Supervisory Authority in case of violation of the regulations regarding the protection of Personal data;
 - f. The right to receive an electronic copy of the User's Personal data (in a structured, commonly used and machine-readable format) and right to transmit those Data to another Data Controller without hindrance from the Data Controller to which the Personal Data have been provided (right to Data portability).

7. Data Controller contact information

Data Controller: **Morecognition s.r.l.**

Registered office: **Piazza Carlo Felice, 7, 10121 Torino (TO)**

You can contact the Data Controller to exercise your rights granted by the GDPR by sending the registered letter to Morecognition s.r.l. at Piazza Carlo Felice, 7, 10121 Torino (TO) or by sending e-mail at privacy@morecognition.com providing the following information: name, surname, and a copy of your identity document.

8. Data Protection Officer contact information

The Data Protection Officer (DPO): **Argo Business Solutions S.r.l.**

The DPO can be contacted by sending an e-mail to the following address: dpo.morecognition@argobs.com

9. Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

10. Changes to this privacy policy

The Data Controller reserves the right to make changes to this Privacy notice at any time by notifying its Users within this Website at the following link: XXX

Privacy Notice updated on: 27/07/2023