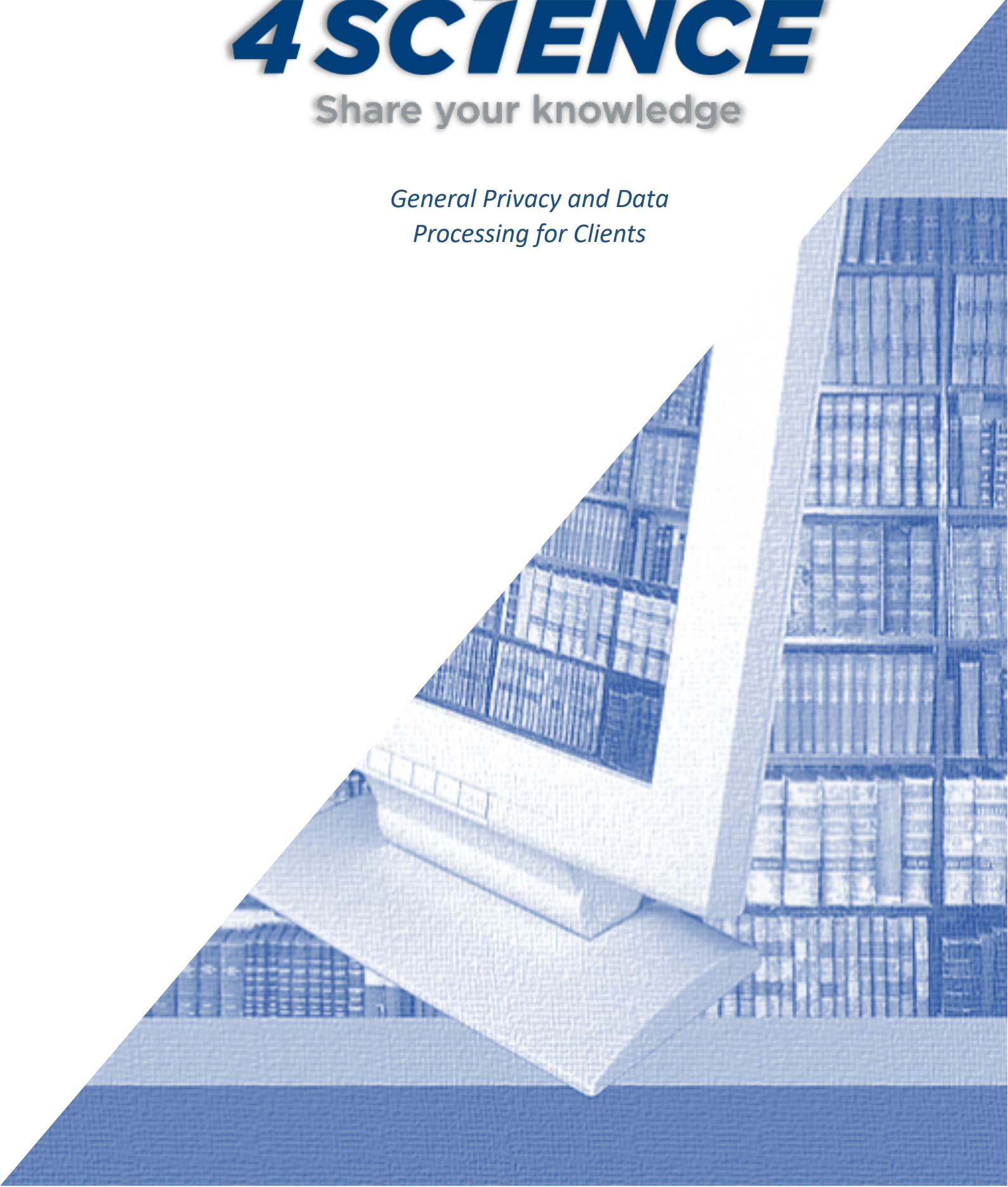


4SCIENCE

Share your knowledge

*General Privacy and Data
Processing for Clients*



The Company 4Science S.p.a. with registered office in Milan (MI), Fiscal Code and VAT IT02451840397, is required to provide precise information on the processing of your personal data, pursuant to Article 13 of EU Regulation 2016/679 "European Regulation on the protection of personal data" (hereinafter "GDPR") and Legislative Decree 196/2003 "Privacy Code", on the rights due to those who contract a contract with the aforementioned Company. We therefore invite you to carefully read the following information in order to then consciously express your will regarding the processing of your data for the purposes and in the manner indicated below.

1. TERMS AND USE

This document is dedicated and may refer to "Users" possibly sharing their data to 4Science's personnel for the purposes enlisted below, notably: Clients, partners and employees identified by Clients/Partners, candidates, or any third party that does business with 4Science.

2. DATA CONTROLLER

The Data Controller, i.e. *the person responsible for deciding on the purposes, methods of processing personal data and the tools used*, is 4Science s.p.a. , with registered office in Milan (MI), via Achille Papa, Nr 30, Tel +39 0544.288711 - Fax +39 0544.463481 - e-mail: privacy@4Science.it – pec: 4Science@pec.4Science.it.

3. PURPOSE OF THE PROCESSING / LEGAL BASIS OF THE PROCESSING

All data communicated by you in advance, in constancy and after the termination of the contract are collected and used within the limits established by law and regulations on the processing of personal data and are processed for the following purposes with relative legal basis:

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PURPOSE	LEGAL BASIS
1. Purposes strictly connected and instrumental to the execution of the obligations deriving from the contract between the Data Controller and the interested party, e.g.: inclusion in the personal data and computer databases for the management of the file, for the provision of the required IT services, the management of estimates and offers, the management of correspondence, transport, shipments and delivery of services even if non-material.	1. The provision of these data has as its legal basis the contract (or pre-contract) between the interested party and the Data Controller pursuant to art. 6.1 letter B. of the GDPR. For all those legally able to enter into a legally enforceable contract, we process the data necessary for the performance of such a contract (also referred to as "General Terms"). The "General Terms and/or Conditions" and their relevant Appendixes set forth the contractual services for which data processing is necessary.
2. Purposes strictly connected and instrumental to the fulfillment of legal obligations to which the Data Controller is obliged	2. The provision of these data has as its legal basis the fulfillment of legal obligation pursuant to art. 6.1 letter C. of the GDPR.

<p>3. If necessary, ascertain, exercise or defend the rights of the Data Controller in court or recover credits out of court.</p>	<p>3. This processing has as its legal basis the legitimate interest of the Data Controller pursuant to art. 6.1 letter F. of the GDPR.</p>
<p>4. Development and continuous improvement of the software in use by Clients which include the importance we assign to providing an innovative, interoperable, fair, Open, secure and profitable service. This excludes any instance in which those interests, whether subjective or not, are overridden by the personal freedoms that require data protection.</p>	<p>4. This processing has as its legal basis the legitimate interest of the Data Controller pursuant to art. 6.1 letter F. of the GDPR.</p>

The processing of data for these purposes is necessary for a correct management of the relationship and their provision is mandatory to implement the purposes indicated above. Any refusal to provide your data could result in the failure to establish or continue the relationship, its exact performance and any legal obligations. Please note that if the communication of your data is incomplete or inaccurate, the correctness of the processing cannot be guaranteed.

4. CATEGORIES AND DATA PROCESSED

- **General:** the processing concerns or may concern the following categories of data: personal data, contact details domiciliation data, data relating to the bank account and other personal data, requested or acquired, for the exclusive achievement of the purposes related to the execution of the contract and the achievement of the purposes of this treatment.
- **User messages and ticketing issues:** 4Science may collect emails Users send to support services for the sole purpose of responding to Users' request and eventually creating reports on the types of issues that arose, including suggestions to improve the services. The emails sent to (or received by) the addresses of the @4Science.com email domain are stored in mail servers managed only by companies that have adhered to the GDPR at least in the services they distribute within the European Union. Anyone who has received one or more messages not addressed to them by mistake from one of these email addresses is asked to delete them and not forward them to any third party.
- **Payments:** Customers provide data that allows 4Science to manage payments for the service being offered and all related tax obligations, including where a customer is a natural person. Italian State tax regulations apply to this data, meaning it shall be stored, once the service has been accepted, in accordance with the prevalent regulation.

4Science may also collect contact names, email addresses, mobile and landline numbers for the administrative purpose of facilitating the performance of these practices. These data concern the Customer or may also concern subjects indicated by her/him/them/them, such as employees, or even users of computer systems (user names), if 4Science is appointed as Data Processor and / or It System Administrator.

5. METHODS OF PROCESSING PERSONAL DATA

The processing of your data will take place at the headquarters of the Data Controller (or if necessary, at the subjects indicated in paragraph 7 below) using paper, electronic or Cloud instrumentation, with logic strictly related to the purposes and in order to guarantee the security and confidentiality of the data. These tools are designed in such a way as to minimize the risk of destruction or loss of data, unauthorized access to them, processing that does not comply with the purposes described in this statement.

Your data is collected exclusively for the purposes described above. **Such data are adequate, relevant, complete and not excessive with respect to the purposes of the processing;** they will be updated, if necessary, so that they can always be guaranteed to be accurate. We also inform you that no automated decision-making process is carried out regarding your data and no profiling is carried out regarding your person.

6. DATA RETENTION TIMES

Your data will be kept for only the time necessary for the execution and fulfillment of the contractual obligations required, except for the exercise of the rights listed below. In any case, the Data Controller and the managers designated by them may keep your data for a further time in order to fulfill specific legal obligations and providing, at the end of this period, for their cancellation. The retention period is usually set at maximum 10 years from the dissolution of the contract; in the case of litigation, until the deadlines for bringing appeals have been exhausted.

We usually store data as long as is necessary for providing our services or until an account is deleted/the contract is expired, whichever occurs sooner. This is decided case by case and varies on the basis of elements such as the nature of the data, the reason for which it has been collected and processed and legal or pertinent operational requirements to retain information.

If the Users wishes to manage, change, limit or erase their data, they may do so in the ways described below and always in written.

7. CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED OR WHO MAY BECOME AWARE OF THEM AS MANAGERS OR EXECUTIVES

For the pursuit of the purposes set out above, your personal data will be processed by the Data Controller, by the Data Processors appointed by her/him/them and by the strictly appointed data processors.

Your data may also be communicated to:

- Subjects whose right of access to data is recognized by law, National and European legislation;
- Collaborators, employees, suppliers and consultants of the Data Controller, as part of their duties and / or any contractual obligations, including the managers of the processing and the authorized;
- Natural and / or legal persons, public and / or private when the communication is necessary or functional to the performance of the institutional activity of the Data Controller or the execution of the contract in the manner and for the purposes described above;

- Territorial Office of the Government for Anti-Mafia certification, pursuant to Presidential Decree 252/1998 and Legislative Decree 490/1994, as well as Public Authorities and Administrations for legal obligations;
- Post offices and couriers for sending documentation and / or material;
- Credit institutions for the management of receipts and payments deriving from the execution of the contract;
- External subjects who carry out specific tasks on behalf of this company in relation to legal, corporate, accounting, tax and judicial obligations (the latter in the event of litigation);
- Parent companies in particular Itway S.p.A., appointed as Data Processor;
- Responsible for the processing in case of requesting Cloud storage services is Aws Amazon Inc;

Your data are not subject to further dissemination.

8. MANAGING DATA

We store data as long as is necessary for providing our services or until the contract is expired/the account(s) is(are) deleted, whichever is sooner. This is decided case by case and varies on the basis of elements such as the nature of the data, the reason for which it has been collected and processed and legal or pertinent operational requirements to retain information.

If the User wishes to manage, change, limit or erase their data, they may do so in the ways described below.

9. DATA TRANSFER TO A THIRD COUNTRY

Processing usually takes place in the EU. Personal data may be processed with IT / electronic tools which could involve a processing of the same in "Cloud Computing", in this case, the storage of the same could also take place on servers located in non-EU countries. 4Science will occasionally employ the assistance of suppliers who are resident outside of the European Union but in nations that have an agreement with the European Union that brings our own legislation into line with that of the Union as concerns privacy policies and data protection. To this end, express consent is required from the interested party if there are no adequacy decisions or the transfer is not subject to adequate guarantees. It is specified that, if the data will be processed with the use of this technology, particularly stringent security measures will be used, and if the transfer must take place at third parties that have not been the subject of adequacy decisions or if the transfer will not be subject to adequate guarantees, the prior consent of the interested party will be required.

10. DATA THAT COULD BE COLLECTED AUTOMATICALLY

- **Usage and access to 4Science' hosted platform** may lead to information regarding User activity within the services it offers, such as use, diagnostics and performance. This includes information on User activity (including how our services are used, settings, interaction with others through our services, time accessed, frequency of use and the duration of such activities and interactions), log files and reports regarding diagnostics, anomalous service crashes, web sites and performance. It also includes data on the moment at which a User registers for our services, the functions they

use, when they last used our services (“last access”) and when they last updated their personal data.

- **Third-party service providers.** We work with third-party service providers to make services available and provide support within them. We work with companies that allow us to support our platforms in a way that provides continuity of service and guarantees that your data is protected. These companies apply at least the same level of policies that we ourselves have adopted in order to guarantee the protection of your data.
- **Website cookies** (see below)

11. WEBSITE COOKIES AND CONTROL

Cookies are small text files. Websites ask browsers to save cookies on computers or mobile devices.

We use cookies to understand, safeguard, run and provide our services through the Internet. For example, we use cookies to:

- identify each User session until they disconnect, without attributing it to the device they used to connect, their name or any of the data being read, collected or processed.
- understand how 4Science’ services are being used and improve them. This is particularly important for studying the functions most used across the world and to improve and optimize user experience.

4Science may use cookies in our web services to make available and provide services, to offer such services on the web, to improve user experience and to understand how our services are being used and improvement them. Cookies may be used to remember anonymous user choices, such as language preferences, so as to provide a more secure experience and to personalize the services offered to users. Please see our complete cookie policy at <https://www.4science.com/wp-content/uploads/2023/07/cookie-policy-finale-4science-v2-eng-1.pdf>.

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12. ENCRYPTION AND DATA SECURITY

4Science is committed to protecting data transmission to all hosted web applications through SSL/TLS encryption with domain certification (DV) using strong encryption algorithms/keys (such as TLS 1.2, ECDHE_RSA and AES_256_GCM). By default, the HSTS directive (HTTP Strict Transport Security) is also enabled.

The servers are located within a VPC, accessible only via SSH with private RSA keys. A software firewall is used to allow only the necessary dialogues between the various application layers reducing to a minimum the surface exposed to any computer attacks.

13. MANAGEMENT OF HOSTED WEB LOG FILES AND APPLICATIONS

Web log files are rotated every 60 minutes and transferred to centralized storage, redundant S3 bucket over multiple data centers in the eu-west-1 region (Dublin), or other location specified in the Contract, with a 99.99999999% durability index. Local retention of log files is 72 hours. The application log files are rotated no

less frequently than daily and are also transferred to centralized storage at a fixed location. Local retention is no more than 30 days.

Individual servers have access only to the storage of logs in a folder reserved for them and cannot retrieve from the centralized bucket any files, including those they sent previously. Centralized storage is configured for 30-day retention of web and application logs.

All operations on the hosted cloud infrastructure are tracked through the AWS CloudTrails service (<https://aws.amazon.com/it/cloudtrail/>) and audit logs maintained on centralized storage with 90-day retention.

14. ACCESSING LOG FILES

The log files are accessible only to 4Science technical staff authorized to analyze problems reported by the Client or detected automatically or manually by monitoring and application analysis. The technical staff has access to the server infrastructure via a private personal SSH key and can use the AWS Cloud services via a personal account protected by 2FA.

15. MONITORING THE INFRASTRUCTURE

Log files are automatically processed once they are available in centralized storage on servers managed by 4Science within its VPC infrastructure in Dublin, or other location specified in the Contract, to enable usage analysis and automatic detection of infrastructure anomalies. Identifying information such as IP address and user name in some logs are automatically removed from the analytical database after 15 days as there is no longer any reason to be. This information is used for the first 15 days to support the analysis of incidents and detect possible DoS attacks.

Anonymous information collected in this way is maintained at 4Science's discretion for statistical analysis only purposes.

16. DELETING DATA METHOD

Data deletion should normally take place using the appropriate application functionalities. Where this is not possible, upon written request supported by documented legal advice from the Customer, 4Science staff will delete the data using one or more of the following alternative strategies:

- direct manipulation of the database, filesystem, object storage and/or other storage;
- application of filters and firewall rules to prevent access to such data if not physically removable.

Where possible, 4Science will apply, within the limits of reasonableness (10% value of the maintenance and hosting contract, if any), the necessary technological interventions to any third parties who have accessed such data in the past, creating or not local copies, to detect the removal of the data.

17. RIGHTS OF THE INTERESTED PARTY/PARTIES

We inform you that the law gives you specific rights indicated in Article 15 et seq. of the GDPR, which you can exercise at any time, including: knowing the existence or not of data concerning you and how they are used; that of requesting their cancellation, transformation into anonymous form or blocking of data processed in violation of the law as well as updating, the correction or when it is interested in the integration of data and to oppose, for legitimate reasons, to the processing itself, as well as to oppose, in whole or in part, for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection, by contacting our Company, mandatorily explaining your request and providing evidence that you own the data concerned at **+39 0544.288711**, or by fax to **+39 0544.463481** .

In any case, the requests referred to in this paragraph may be submitted in writing by e-mail sent to the address **privacy@4Science.it** - pec: **4Science@pec.4Science.it**.

Data subjects may object to the processing of their data in the event that it is being processed on the basis of a joint data controller's legitimate interests. In such an instance, we shall immediately cease processing their personal data unless the processing has a valid legitimate basis or is a legal requirement.

In any case, you will always have the right to lodge a complaint with the **Guarantor Authority for the Protection of Personal Data, at Piazza Venezia Nr. 11 - 00186 Rome (RM) - Tel. 06- 696771 - rpd@gpdp.it**;

18. POLICY UPDATES

The User shall be informed of any relevant changes made to the present Privacy Policy in future and shall be supplied with a copy of the modified version so as to make an informed decision as to whether to continue using our services.

- **END OF DOCUMENT** -

On behalf of

I declare that I have read and understood the entire content of the information provided by you pursuant to Article 13 of EU Regulation no. 679/2016 and that I have received a copy.

Milan, ___/___/_____

Role _____

Signature _____