



# PRIVACY POLICY

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Finder S.p.A. with sole shareholder (“Finder”) recognizes the importance of protecting the privacy and personal data of all subjects with whom it interacts, in compliance with current regulations - General Data Protection Regulation (GDPR - EU Regulation 2016/679) and the Italian Personal Data Protection Code (Legislative Decree no. 196/2003) - including the ISO/IEC 27701 standard. This Privacy Policy outlines the way in which Finder processes personal data to ensure confidentiality, integrity and availability of information.

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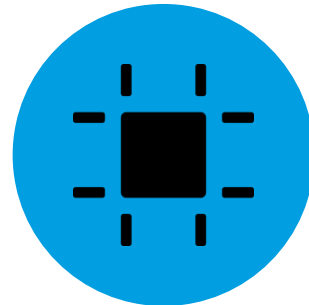
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This Privacy Policy applies to all personal data processing carried out by Finder, using electronic or paper tools, concerning:

- Employees, Employee's Spouse, Family Members and Dependents;
- Job Applicants, Prospective Collaborators, Collaborators and Interns;
- Visitors and Users of Online Systems;
- Customers, Suppliers, Employees, Partner or Third Party Companies, Public Administrations, Private Citizens, Other Stakeholders;
- Reporting Persons, Persons Concerned, Third Persons, Facilitators;
- Subjects filmed by the video surveillance system in company areas.

**Finder commits to:**

- Ensuring the compliance of personal data processing with current regulations;
- Protecting the rights of data subjects;
- Ensuring transparency and clarity on how data is processed.

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The processing of personal data by Finder is based on the following principles:

1. **Lawfulness, fairness and transparency:** Data is processed in a legal, ethical and transparent manner in relation to the Data Subjects;
2. **Purpose limitation:** Personal data is collected for explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. **Data minimization:** Only data strictly necessary for the specified purposes is collected.
4. **Accuracy:** Data is kept up to date and correct.
5. **Storage limitation:** Data is stored only for the period necessary to achieve the purposes of the processing.
6. **Integrity and confidentiality:** Data is processed ensuring an appropriate level of security to prevent unauthorized access, loss or damage.
7. **Accountability:** Finder adopts appropriate technical and organizational measures to demonstrate the compliance of data processing with applicable regulations.

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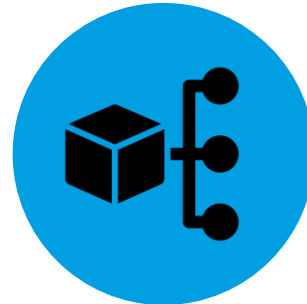
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Finder processes the following **categories** of personal data:

- **Identification data** (tax code, images (photo/video), name, surname, gender, date and place of birth, residence, phone number);
- **Contact data** (email, phone number, address, province, country);
- **Contractual and payment data** (bank details, tax data, contract details, profession, any additional personal data contained in the proof of purchase, accumulated points and rewards granted);
- **Professional data** (job position, curriculum vitae, personal information voluntarily communicated by the Data Subject, fitness for work);
- **Sensitive data** within the limits set by law (medical certificates for work purposes, personal information voluntarily communicated by the Data Subject);
- **Browsing data** (technical browsing data, statistical information on website usage, information described in the cookie policy);
- **Personal data** provided in the **report** or in information subsequently provided by the reporting person;
- **Personal data necessary for the exercise of rights**;
- **Personal data whose communication is required by law** or by order of the Public Authority.

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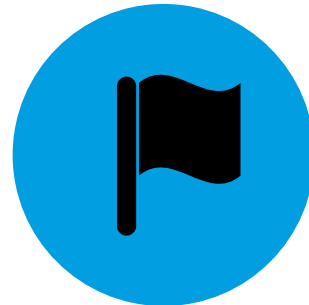
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Personal data is **processed** for the following purposes:

- To respond to requests from the Data Subject sent through the contact channels available on the website;
- Proper and complete execution of the contractual relationship with Customers and Suppliers, surveys on service satisfaction;
- Compliance with legal, administrative, accounting, tax obligations of the Data Controller;
- Human resources and work relationships management;
- Guarantee of physical and IT security;
- Marketing and promotional communications, subject to express consent, participation in prize operations and the execution of related activities;
- Management and handling of whistleblowing reports;
- Protection of the safety of people and property within the company areas;
- Anonymous statistical analysis;
- Collection, use and storage of images for informational purposes and potentially promotional purposes regarding Finder's activity;
- Protection of rights.

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The **legal basis** on which Finder bases the processing of personal data include:

- **Pre-contractual measures** adopted at the request of the Data Subject;
- **Performance of a contract** in existence or under negotiation between the parties;
- **Compliance with a legal obligations**;
- **Consent** of the Data Subject, where required;
- **Legitimate interest** of the Data Controller, in compliance with the fundamental rights and freedoms of the Data Subjects;
- **Art. 122 Legislative Decree 196/2003** - consent not necessary.

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In accordance with the ISO/IEC 27701 standard, Finder has implemented a Privacy Information Management System (PIMS), which may include:

- **Encryption or pseudonymization** of personal data;
- **Access controls** based on the principle of least privilege;
- **Data backup and recovery procedures**;
- **Periodic audits** to verify the effectiveness of security measures;
- **Continuous training** of staff on security and privacy topics.



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Under the GDPR, data subjects may exercise the following **rights**:

- **Access** to their personal data;
- **Rectification** of inaccurate or incomplete data;
- **Erasure** of data (right to be forgotten);
- **Restriction** of processing;
- Data **portability**;
- **Objection** to processing, for legitimate reasons;
- **Withdrawal of consent** , where applicable.

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Personal data may be shared with:

- Public Authorities and Competent Authorities, where required by law;
- Suppliers and Partners involved in the services provided by Finder;
- Finder Group companies, in compliance with the stated purposes.

In the case of data transfers to non-EEA countries, Finder ensures compliance with the provisions of the GDPR by adopting standard contractual clauses or other appropriate measures.

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To exercise any of rights relating to the processing of personal data, Data Subjects may contact the Data Controller by sending request through the **Contact Form**:

<https://www.findernet.com/en/worldwide/>

or

<https://www.findernet.com> select “Support” ➡ “Data Protection”.

Data Subjects also have the right to lodge a complaint with the Personal Data Protection Authority.