

PRIVACY STATEMENT
ex artt. 13-14 Reg. 679/2016 UE

Data Subjects: clients (legal representatives/proxies/contact persons of companies and public entities)

1. IDENTITY AND CONTACT DETAILS OF THE JOINT CONTROLLERS

360 Payment Solutions S.p.A., with registered address in Via Quintino Sella n. 3, 20121, Milano, VAT n. 13091510159, duly represented by Marco Alberti, **Trans Ferry S.p.A.**, with registered address in Via Quintino Sella n. 3, 20121, Milano, VAT n. 10503910969, duly represented by Marco Alberti, **Trans Modal S.r.l.**, with registered address Via Quintino Sella n. 3, 20121, Milano, VAT n. 06752410966 duly represented by Marco Alberti, **Plose Sistem Service S.p.A.**, with registered address in Via Vittorio Veneto n. 69, 39042, Bressanone (BZ), VAT n. 01178970214 duly represented by Marco Alberti e **Yes!Money S.A.**, with registered address in Via delle Scuole 5, 6900, Paradiso, VAT n. CHE114254599 duly represented by Luca Papa, are joint controllers pursuant to art. 26 GDPR.

For communication regarding the processing of personal data you can contact the Joint Controllers at the following email address: privacy@360pays.com.

2. PROCESSED PERSONAL DATA

360 Payment Solutions S.p.A. provides intercompany services and therefore it does not have any client, however, by carrying out services to other companies of the group, it may process clients' personal data collected by the other joint controllers.

2.1 PERSONAL PROCESSED BY PLOSE SISTEM SERVICE S.P.A

Personal Data	Special Categories
<ul style="list-style-type: none">- Biographical data- Contact information (email, phone number, cell phone number)- Tax code- VAT number;- Residential address- Copy of the identity document of the legal representative- Copy of the identity document of the customer's employee (i.e. driver), which can be obtained from the company Plose Ate Soc.A.R.L., which is controlled by PSS and appointed as the responsible party ex art. 28 GDPR.- corporate banking data	Other categories of data referred to in Articles 9 (special categories) and 10 (relating to criminal convictions and offenses) of the GDPR are not processed, with the exception of data contained in copies of identity documents that may be collected.

2.2 PERSONAL PROCESSED BY TRANS FERRY S.P.A

Personal Data	Special Categories
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<ul style="list-style-type: none"> - full name; - tax code; - VAT number; - professional domicile and/or place of work; - email address and/or certified email PEC; - telephone and fax number; - company bank details; 	<p>Categories of data referred to in Articles 9 (special categories) and 10 (relating to criminal convictions and offenses) of the GDPR are not processed.</p>
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2.3 PERSONAL PROCESSED BY TRANS MODAL S.R.L.

Personal Data	Special Categories
<ul style="list-style-type: none"> - full name; - tax code; - VAT number; - professional domicile and/or place of work; - e-mail address and/or certified email (PEC); - telephone and fax number; - company bank details; - copies of identity documents 	<p>Categories of data referred to in Articles 9 (special categories) and 10 (relating to criminal convictions and offenses) of the GDPR are not processed.</p>

2.4 PERSONAL PROCESSED BY YES MONEY S.A.

Personal Data	Special Categories
<ul style="list-style-type: none"> - first and last name - date and place of birth - nationality - tax code and VAT number - professional domicile and/or place of work - home address - e-mail address - telephone and fax number - copy of an identity document of the legal representative - U.S. tax status declaration for natural persons - Request for Taxpayer Identification Number and Certification (Mod. W -9 Form) - Waiver of Banking Secrecy Rights - political involvement - Citizenship (specifically: if there is U.S. citizenship) - Client data if employee: position, name of employer, industry, estimated annual salary - Client data if professional/entrepreneur: company name, location, number of employees, address, group structure, detailed business description, turnover in USD for the last three years - Copy of valid identity document - Certificate of domicile, utility bill (not older than 3 months) or other official document confirming the place of residence - Copy of tax declaration or equivalent official document confirming that the funds used to recharge the card are declared to the tax authorities of the country of residence - Estimated net worth 	<ul style="list-style-type: none"> - Any special categories of data from the tax declaration collected; - Any data collected from copies of identity documents; - Political involvement; - Criminal records certificate.

<ul style="list-style-type: none"> - Source of funds (savings, salary, family fortune, inheritance/gift, sale of assets, other) - Estimated annual reload amount/estimated annual cash withdrawals as a percentage of card use - Data on transactions made with the Yes!Money card by individual users (amount, date, location of transaction) - Copy of an identity document of the Yes!Money card user 	
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3. PURPOSE AND LEGAL BASIS OF PROCESSING

3.1 PROCESSES NECESSARY FOR THE PROVISION OF SERVICES (WITHOUT THE CONSENT OF THE DATA SUBJECT)

- Fulfillment of contractual and/or pre-contractual obligations arising from any contractual relationship, e.g., sales management activities, sales and after-sales services, administration/invoicing/accounting, customer relationship management, provision of data on transactions made by customers (art. 6, para. 1, lett. b, GDPR)
- fulfillment of obligations under applicable laws, regulations, national and/or EU norms or orders of public, judicial authorities to which one or more of the Joint controllers are bound (art. 6, para. 1, lett. c, GDPR);
- protection of defense rights in case of litigation (art. 6, para. 1, lett. f, GDPR).

The provision of data in connection with the aforementioned purposes is mandatory, as it is a necessary requirement for the conclusion of the contract or the execution of pre-contractual measures in connection with the provision of services.

3.2 PROCESSING FOR "SOFT SPAM" MARKETING PURPOSES (WITHOUT THE CONSENT OF THE DATA SUBJECT AND ON THE BASIS OF LEGITIMATE INTEREST, ART. 6, PARA 1, LETT. (F), GDPR) BY THE JOINT CONTROLLERS AND BY OTHER COMPANIES OF THE SAME GROUP:

- sending electronic communications to market and promote the sale of products and services analogous to those already purchased by the data subject or that the data subject may be interested in purchasing or considering purchasing; such products and services will be those developed and/or marketed by one or more of the Joint Controllers or other companies of the same group within the scope of their business activities. As part of the above purposes, an individual Joint Controller may promote the sale of products and services of other Joint Controllers or other companies of the same group based on the activities carried out by its customers that are analyzed in an aggregate manner. In any case, the data subject has the opportunity to oppose the processing of data for the purposes referred to in this point at any time, either at the start of the processing or by clicking on the appropriate link provided in each communication (Article 130, paragraph 4, Legislative Decree No. 196 of June 30, 2003, as updated).

4. STORAGE AND PROCESSING METHODS

For the purposes referred to in clause 3.1, the data are kept for the time necessary for their achievement, therefore until the date of termination of the contractual relationship and, in any case, in compliance with the prescriptive terms mandatory by law.

For the purposes referred to in clause 3.2, above, the data are processed for the period corresponding to the duration of the contract and, in any case, up to a maximum of 12 months following the termination of the contract for whatever reason or at the time when the client communicates to one of the Joint Controllers that he/she no longer wishes to place purchase orders or that he/she is not interested in the products and/or services marketed by the group.

Personal data will be processed, managed and stored on servers located within the European Economic Area and may be transferred, if necessary for the performance of the activities of one or more of the Joint Controllers to some countries outside the European territory (mainly Switzerland). Should it be necessary to use the services of third parties located outside the European territory, we hereby inform you that the transfer of your personal data to such parties will be carried out in strict compliance with the provisions of Articles 44 et seq. of the Regulations. This assures you that all necessary measures will be taken in order to ensure the fullest protection of your personal data since this transfer will be based on contractual agreements or other appropriate legal basis aimed at protecting Your rights and interests. Your personal data will not be disseminated.

5. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The processing of personal data is also carried out by the Joint Data Controllers through data processors and authorized persons appointed pursuant to Articles 28 and 29 GDPR, including within the other companies of the corporate group to which they belong.

Depending on the services provided and the agreements entered into from time to time with suppliers, the latter may act as autonomous data controllers, issuing their own information to data subjects and collecting consent where necessary.

An up-to-date list of Data Processors and Authorized Persons in charge of data processing is kept at the head office of one or more of the Joint Controllers and can be requested by sending an e-mail to: privacy@360pays.com

6. DATA SUBJECTS' RIGHTS

The data subject may exercise the following rights: to withdraw the consent provided at any time (Art. 7 GDPR), access his/her personal data (Art. 15 GDPR); rectification request (Art. 16 GDPR), erasure (Art. 17 GDPR), restrictions of processing (Art. 18 GDPR), portability of data in a structured, commonly used and machine-readable format (Art. 20 GDPR); oppose the processing, even automated (Art. 21 and 22 GDPR); lodge a complaint before the competent supervisory authority (Art. 77 GDPR), if the processing is deemed to be against the applicable legislation.

For full reading of the text of the above articles, please refer to the website of the Authority for the Protection of Personal Data, (<https://www.garanteprivacy.it/Regolamentoue/diritti-degli-interessati>).

You may exercise your rights by sending an e-mail to privacy@360pays.com

Data subjects may also request to view the essential content (excerpt) of the Joint Controllers' Agreement entered into by Yes!Money S.A., 360 Payment Solutions S.p.A., Trans Ferry S.p.A., Trans Modal S.r.l. and Plose Sistem Service S.p.A.

360 Payment Solutions S.p.A.

Trans Ferry S.p.A.

Trans Modal S.r.l.

Plose Sistem Service S.p.A

Yes!Money S.A.

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