

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

Data Subjects: prospects (legal representatives/proxies/contact persons of companies)

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

Joint Controllers	Personal Data	Special Categories
360 Payment Solutions S.p.a	name and surname, VAT number, professional domicile and/or place of work, contact details such as email address and /or certified email address and phone number.	Categories of data referred to in Articles 9 (special categories) and 10 (relating to criminal convictions and offenses) of the GDPR are not processed.
Plose Sistem Service S.p.A.		
Trans Ferry S.p.A.		
Trans Modal S.r.l.		
Yes Money S.A.		

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 commercial relationship, such as activities aimed at entering into a contract, introduction of products and services management of the relationship with prospects (art. 6, paragraph. 1, lett. b, GDPR) with one or more Joint Controllers or companies controlled and or/connected and/or belonging to the same group of companies.

The provision of such data for these purposes is mandatory being this an essential requirement for the conclusion of the contract with one or more Joint controllers as well as for the execution of pre-contractual obligations related to the provision of services.

3.2 PROCESSING FOR MARKETING PURPOSES (WITH THE CONSENT OF THE DATA SUBJECT, ART. 7 GDPR):

- direct marketing activities, consisting in the distribution and dissemination of material of an informative nature on the products and services of one or more of the Joint Controllers or subsidiaries and/or affiliates and/or otherwise part of the same corporate group: sending newsletters, DEM of a commercial nature, invitations to events via e-mail, including on social network platforms. The provision of data is optional for these purposes and any refusal to process them does not compromise the regular execution and/or continuation of pre-contractual negotiations. In any case, the data subject may revoke his/her consent at any time by clicking on the appropriate link at the occasion of any communication.

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 and, in any case, for a period not longer than 12 months from the in any case, for a maximum period of 12 months from the sending of the business proposal, provided that the data will be further stored in case of conclusion of a contractual relationship;

For the purposes referred to in clause 3.2: data are processed and stored until the data subject's consent is revoked, which may be expressed at any time.

Your 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 GDPR. This assures you that all necessary measures will be taken in order to ensure the fullest protection of your personal data as 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 laws.

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.

Last. Rev.: December 2022