

Privacy Policy

Wise SGR S.p.A. ("Wise") Privacy Policy

This privacy policy (hereinafter the "**Policy**"), drafted in accordance with EU Regulation 679/2016 ("**GDPR**") and Legislative Decree 196/2003, as supplemented and amended (together with the GDPR, the "**Applicable Privacy Law**"), describes how and when Wise collects, uses and shares the information generated or actively provided by you when using the website www.wisesgr.com and the other contact channels (e.g. e-mail address info@wisesgr.com) available on the website (jointly, the "**Services**"). The data controller and service provider is Wise SGR, with registered office in Milan, Italy, Foro Buonaparte no. 76 and Tax Code and VAT no. 13142090151 (the "**Data Controller**"). When you use any of our Services, you are aware that it implies the collection, transfer, storage, organization, consultation, processing, modification, selection, retrieval, comparison, use, interconnection, blocking, communication, dissemination, deletion and other uses of your information as described in this Policy, and we therefore recommend that you read it with due care.

Collection and use of information

Information you provide. You may provide us with personally identifiable information ("**Personal Data**") when using our Services, by entering your name and other personally identifiable information or by sending us materials and information that identify you.

Automatically Collected Information. We automatically collect your personal information when you use the Services. This may include your IP address, software configurations, smartphone ID numbers, the address of websites you visited before visiting our website, and other similar data.

Login Information. We collect the information you provide (username, email, password) to login to the private area of the site.

Cookies and other similar technologies

Like many other websites, we use "Cookies" technology to collect data about the website's use and to improve our Services.

Cookies may be stored on your device and transmitted back to you when you use the Services a second time. Through cookies, websites record the actions and preferences of users (such as, for example, the language chosen, font size, other settings regarding the layout of the site, etc.), so as to prevent the user from having to enter them when returning to the site a second time or when browsing another page of the same site. Cookies are also used to ensure the login of users, to monitor navigation sessions, to store information about users who have access to the site and may contain a unique identification code that makes it possible to track the user's navigation session on the site, for statistical and advertising purposes. Users may also download cookies on their devices that are owned by websites and servers other than the site they are currently visiting ("Third Party cookies"). Some Cookies are necessary for the technical functioning of the site; if you do not accept this type of Cookies, some features and characteristics of the site may not be accessible.

There are different types of cookies, depending on their characteristics and functions, and may be stored on your devices for different periods of time: session cookies are deleted at the end of each browsing session; persistent cookies may persist until the date predetermined by their owner.

On the basis of the current legislation on Cookies, the user's consent to the use of Cookies on the site www.wisesgr.com is not necessary, as the site uses only the so-called "technical cookies", exclusively for the purpose of transmitting a communication over electronic communication networks, or when it is strictly necessary for the provision of a service expressly requested by the user. This type of cookie is essential for the proper functioning of the site and to perform the activities specifically requested by users.

Among the **technical cookies**, which do not require express consent from the user to be used, the legislation includes the following:

- "Analytical cookies" to the extent that they are used directly by the website operator to collect aggregate information and information about visits to the website,
- "browsing" or "session cookies" (to login to the site),
- "Functional cookies", which allow users to navigate according to certain predetermined criteria, such as the language or products to be purchased, in order to improve the quality of service.

There are also **profiling cookies**, *ie* those aimed at creating user profiles and used to send advertising messages in line with the preferences shown by the user during navigation, for which the prior consent of the user shall be required. The website www.wisesgr.com does not use these cookies.

Types of Cookies used by the site

The site uses only proprietary cookies, which are the following:

- Technical browsing or session cookies, strictly necessary for the operation of the site and to provide users with the services they expressly requested;
- Technical and analytical cookies, used by the operator of the site to collect aggregate information about the number of visitors and information about visits to the site. This type of cookies does not collect Personal Data. The information collected is treated anonymously and in aggregated fashion. The data controller may use this aggregate information to analyse market trends, manage the site, track user movements and collect a large amount of demographic information for aggregate use;
- Functional technical cookies, which allow users to navigate according to certain predetermined criteria, such as language, in order to improve the quality of service offered.
- Tracking cookies, which allow us to verify the origin of a user from another site.

Please note that if you choose to disable technical/functional cookies, including through your browser as described below, the website may not function properly, and some website features may not be available or may not function properly.

How to view and change your Cookies settings through your browser

Users can select the cookies they wish to enable, disable or delete (totally or partially) using the tools offered by the browser used. In any case, it should be noted that the disabling of technical/functional cookies could lead to a deterioration in the use of the site and that some services offered or some features of the site may not function properly or not be available, and that it may be required to modify or manually enter certain information or preferences each time you visit the site.

To learn more about how to set your cookies preferences through your browser, please read the information available at the following links (Wise does not control third party browsing sites or their instructions on how to enable and disable cookies; these pages may be updated, modified or removed from third party browsers at their sole discretion):

- [Internet Explorer](#)
- [Firefox](#)
- [Safari](#)
- [Chrome](#)

For more information about cookies, please refer to our Cookie Policy, as set out in Annex A to this Policy.

Sharing information

We may share your personal information with the following parties:

Subjects predetermined by law or when necessary to protect our Services. There may be cases of communication of your information to other parties (e.g. public and/or private organisations authorised by law to receive it and to persons, companies, associations or professional firms providing services or activities of assistance and advice to the Data Controller), in order to:

- protect the rights of Wise and the users of its Services;
- protect the safety of users of the Services;
- prevent fraud (or for *risk management* purposes); or
- to comply with the requirements of the law or judicial proceedings or in the case of a request for cooperation by a government agency, whether or not required by law.

Other Subjects in aggregate form. We may also share your information with third parties in aggregate or non-personally identifiable form.

Safety and security

We use physical, technical and administrative measures to safeguard the information in our possession against loss, theft and unauthorized use, communication or modification of Personal Data. Please note that, in any case, no transmission or storage of Personal Data can be guaranteed to be 100% secure. Consequently, while we strive to protect the information we hold about you, we cannot guarantee or ensure the complete security of any information you transmit to us.

Policy for the processing of data relating to minors

Our Services are not intended for persons under 18 years of age. If you become aware that a child under the age of 18 has provided us with his or her personal data, please contact us at info@wisesgr.com. We do not knowingly collect personal information from children under 16 years of age. If we become aware that a child under the age of 16 has provided us with his or her personal data, we will take the necessary steps to remove that information.

Policy for the processing of data relating to candidates for positions at Wise

If you use our Services (*i.e.* interaction via email) to send, spontaneously or on request, your application for an open position with the Data Controller, the latter will process your common Personal Data, contained in your *curriculum vitae* and all those provided by you and concerning aspects relevant to the assessment of your professional aptitude such as, by way of example and not limited to, degrees, certificates of previous professional experience, your economic or organizational requirements relating to the employment relationship for which you apply. *Curricula* or other documents containing particular categories of data, as per art. 9 of the GDPR (*i.e.* disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs, etc.), will not be accepted, unless the processing of such data is necessary to fulfil the obligations and exercise the specific rights of the person concerned with regard to labour law, social security and social protection under the Applicable Privacy Law. If information is provided in any way relating to these special categories of data, as referred to in Art. 9 of the GDPR, the Data Controller will proceed with the deletion thereof. Please note that your personal data will be processed for the purposes of research, evaluation and selection of personnel, as well as for administrative and accounting purposes and to comply with legal obligations. The execution of pre-contractual measures taken on the basis of a request from the data subject and the fulfilment of legal obligations constitute the legal basis for the processing. The Personal Data transmitted in the context of your application or a staff selection process initiated by the Data Controller will be kept for 24 months following the closure of the selection process or the date of spontaneous sending of the *curriculum vitae*, in order to facilitate contact by both parties in the event of new employment opportunities.

Policy for the processing of data relating to professional contacts relevant to Wise

If your professional profile is of particular interest for the purposes of the activities carried out by the Data Controller, the latter may, also through the Services, process your common Personal Data, contained in your *curriculum vitae*, and all those provided by you concerning aspects relevant to the assessment of your professional aptitude and of your specific qualifications and/or professional experience relevant to the areas of activity of the Data Controller, such as, by way of example but not limited to, degrees, certificates of previous professional experience, your economic or organizational requests regarding your previous employment relationships with previous business partners, suppliers, subscribers or investors of the Data Controller. *Curricula* or other documents containing particular categories of data, as per art. 9 of the GDPR (*i.e.* disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs, etc.), will not be processed, unless it is necessary to fulfil the obligations and exercise the specific rights of the person concerned with regard to labour law, social security and social protection under the Applicable Privacy Law.

If the candidate provides information on these special categories of data, as referred to in Art. 9 of the GDPR, the Data Controller will delete them. Please note that your Personal Data will be processed to send you updates and information in relation to the availability of job opportunities in senior positions at Wise or third parties, for which you may be interested because of your professional profile. Your Personal Data will be kept for a period of 5 years from the time it was first transmitted by you, or for 2 years from the date of closure of a selection process in which you may have taken part, in order to facilitate contact by both parties in the event of new employment opportunities. Your Personal Data will be processed to provide a service you have requested or for which you have expressed an interest by sending or leaving your CV or other contact details to the Data Controller, pursuant to Article 6 paragraph 1 letter b) of the GDPR; for this reason, you will not be asked for your consent.

Your rights

Wise does not share your Personal Data with third parties for direct marketing purposes. Your Personal Data will not be subject to disclosure. Wise has adopted the iCloud *suite* of services to which the Wise domain mailboxes and *database* will be transferred. iCloud is a service of Microsoft Ireland Operations Limited ("**Microsoft**"), purchased by Wise through an external provider. Microsoft and the intermediary provider have been designated as data processor pursuant to Art. 28 of the GDPR, and will process Personal Data on behalf of Wise in accordance with its instructions and the highest security standards of the GDPR. The Data Controller has instructed the two data processors to process and store Personal Data within the European Union; if, by virtue of Microsoft's security and *back-up* policies, Personal Data were to be transferred outside the European Union, such transfer would take place on the basis of the standard clauses set out in Decision (EU) 87/2010.

We inform you that, in relation to your Personal Data, you may exercise all the rights provided for in the Applicable Privacy Law and in particular: *(i)* ask the Data Controller to confirm the existence of his/her Personal Data, the origin of such data, the logic and purposes of the processing, the categories of subjects to whom the data may be communicated, as well as the identification details of the Data Controller and the data processors; *(ii)* request access to Personal Data, transformation into anonymous form, blocking, rectification, integration or deletion of the same, or limitation of processing; *(iii)* oppose processing in the cases provided for in the Applicable Privacy Law; *(iv)* exercise the right to portability, within the limits provided for in Article. 20 of the GDPR; *(v)* revoke consent (where this is the necessary legal basis for processing) at any time without prejudice to the lawfulness of processing based on consent given prior to revocation; *(vi)* make a complaint to the Data Protection Authority, following the procedures and guidance published on the Authority's official website at www.garanteprivacy.it.

Exercise of users' rights

You can contact Wise by email at info@wisesgr.com, in order to assert your rights.

Amendments to this Policy

We may review this Privacy Policy over time. The most recent version of the Policy will govern Wise's use of your Personal Data and will be available on the website www.wisesgr.com. We may make changes to this Policy at our sole discretion. By continuing to access or use our Services after any changes have become effective, you agree to the terms of the revised Privacy Policy.

Questions, questions

If you have any questions about this Policy or your privacy in using our Services, please contact us at atinfo@wisesgr.com.

ANNEX A

Cookies Policy Cookies used at www.wisesgr.com

IIS (web server) / WAF (application firewall):

Technical cookies:

Cookie Name	Expiration Time	Purpose	Domain
ASP.NET_SessionId	session	session cookie (i.e. it expires and is removed from the browser when the browser is closed), is a technical cookie aimed at speeding up the navigation of the site	domain site
adm_2_0	session	user authentication management cookie, the purpose of which is to maintain knowledge of the authenticated user profile (i.e. a user who has registered by accepting the confidentiality document and who has subsequently explicitly authenticated himself at least once on the site with a username and password) and thus enable the use of content reserved for him.	domain site
BNES_*	Session	functional cookies to manage the security of the site	domain site

MATOMO (formerly PIWIK)

A tool for analyzing site traffic in aggregated and anonymous cookie list

form:

Cookie	Expiration Time	Purpose	Domain
_pk_id*	1 year	is used to count the visits made by the browser on the site. It is increased with each visit and also contains the date-time of the last visit. The standard setting is for the cookie to be valid for two years.	domain site
_pk_ses*	30 minutes	is used in combination with the previous one to manage the increment of the count. It is a cookie whose validity is 30 minutes.	domain site
_pk_ref*	6 months	is used to track the origin on the site from third party sites. Contains the url of the site of origin. The standard setting is a cookie validity date of 6 months.	domain site
_pk_cvar*	changeable	any custom variables	domain site

In accordance with current legislation, the site does not provide for the deactivation of cookies used.