

## PRIVACY POLICY

Dear Interested Party,

**LVenture Group S. p. A. ("LVG")** has great respect for the privacy of Users who visit the LVenture Group website.

The data that may be communicated in the Website will be managed with the utmost care and with all the instruments necessary to guarantee their security, in full compliance with the regulations in force to protect their confidentiality. We wish to inform you that the "European Regulation 2016/679 on the protection of individuals with regard to the processing of personal data and their free movement" (hereinafter "**Regulation**" or "**GDPR**") provides for the protection of individuals about the processing of personal data as a fundamental right. Therefore, according to Article 13 of the GDPR, we wish to inform you of the following.

### 1. WHAT IS LVENTURE GROUP

LVG is an investment holding company listed on the MTA of Borsa Italiana that invests in innovative startups. In particular, it provides structural and technical services to support startups and, through the LUISS EnLabs accelerator, helps them in their growth and development process.

LVG, under the GDPR Regulation, acts as **Data Controller** concerning the data communicated by the Users when browsing the Site.

By accepting the following privacy policy, the User declares that he is aware that his personal data may also be communicated to third parties, always for purposes related to the provision of services.

#### 1.1 WHAT IS CALL FOR SOLUTIONS

Within the "Call for solutions" program, LVG together with Poste Italiane S.p.a. (as Data Controller) developed a programme that looks for digital solutions that can improve the insurance offer of Poste Italiane Group for Small and Medium Enterprises (SMEs). Our target solutions will be sought in relation to innovative insurance products and the claims area.

The call is open to both Italian and International startups. They must be already incorporated and have raised at least one seed round. We are looking for startups with relevant market traction, an established customer portfolio and a use case compliant with the Poste Italiane context.

The aim is to digitize the insurance industry as well as provide customers with increasingly personalized products and services, this Program will select the most effective InsurTech solutions to test them and be developed with Poste Italiane.

The winning solutions will carry out a Proof of Concept with Poste Italiane. The Proof of Concept will last three months, with the aim of scaling up within the Poste Italiane Group.

### 2. GLOSSARY

**"Contact"** means the section on the Site in which the User voluntarily enters his/her data to be contacted by LVenture Group.

**"Personal data"** shall mean any information relating to an identified or identifiable natural person, namely an identifier such as a name, an identification number, location data, an

online identifier or one or more factors specific to his physical, physiological, genetic, mental, economic, cultural or social identity.

**"LVG" and/or "LVenture Group" is LVenture Group S. p. A. - Rome (RM) Via Marsala 29/h CAP 00185 P.IVA 01932500026 C.F. 81020000022 e-mail: [info@lventuregroup.com](mailto:info@lventuregroup.com).**

**"Data Processor"** the natural person, legal entity, public administration and any other entity that processes personal data on behalf of the Controller.

**"Site"** is the website belonging to LVenture Group.

**"Controller"** means the natural or legal person, public authority, service or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data and the instruments adopted, including security measures.

**"User(s)" and/or "Data Subject(s)"** means the individual who visits the Site ([www.lventuregroup.com](http://www.lventuregroup.com)) and to whom the Personal Data relate.

### 3. CATEGORIES OF DATA

The Data Controller collects Personal Data and other information directly from its Users through the [www.lventuregroup.com](http://www.lventuregroup.com) website (typically, this includes data such as e-mail address, first and last name).

The object of the processing may be the Personal Data of the Users such as:

#### **a. Data provided in the Contact phase.**

LVG will process the personal data that the User provides to contact LVenture Group directly. This data is provided directly by the User and may include contact data, including but not limited to name, surname, e-mail address and other data provided voluntarily by the User. If the User so authorizes, or also through the use of cookies, LVG may store data provided by the User. It is understood that the User will be entitled to request the deletion of the personal data provided during contact.

#### **b. Automatically collected data.**

LVG site computer systems and applications collect some data (whose transmission is implicit in the use of Internet communication protocols) that are potentially associated with identifiable users. The data collected include IP addresses and domain names of the Users' device that is connected to the Site, the URI (Uniform Resource Identifier) addresses of the resources requested, the method used to submit the request to the server, the file size obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters regarding the operating system, the browser and the computer environment used by the User, the name of the internet service provider (ISP), the date and time of the visit, the web page the visitor came from (referral) and the exit page.

#### **c. Data provided voluntarily by the User.**

The voluntary and explicit sending of emails to the addresses indicated in the Site does not imply a request for consent and entails the acquisition of the sender's address and data. This is necessary to respond to requests, as well as any other personal data

included in the message. Such data is understood to be voluntarily provided. By entering a comment or other information, the User expressly accepts this document

d. **Cookie.**

The Site uses cookies. The data collected thanks to cookies may be used to access parts of the Site or for statistical purposes or to make the browsing experience more pleasant and more efficient in the future, trying to assess user behaviour and to modify the proposed content offer according to their behaviour. For more information click [here](#).

e. **Plug-in.**

The Site also incorporates plug-ins and/or buttons for social networks to allow easy sharing of content on preferred social networks. These plug-ins are programmed in such a way as not to set any cookies when accessing the page, as to safeguard Users' privacy. If the social network requires it, cookies may be set only when the User makes effective and voluntary use of the plug-in. Please note that if the User browses while logged into the social network then he has already consented to the use of cookies conveyed through this Site at the time of registration with the social network. The collection and use of the information obtained using the plug-in are governed by the the social networks privacy policies.

#### 4. SOURCE OF PERSONAL DATA

The personal data held by the Data Controller are collected directly from the Data Subject through the voluntary completion of specific requests during contact.

#### 5. PURPOSE OF DATA PROCESSING AND LEGAL BASIS

The processing of Users' data has the following purposes and legal basis:

1. Newsletter

**Purpose:** to send e-mails on news and topics of interest.

**Legal basis:** consent of the User.

2. Detecting or preventing fraudulent activities

**Purpose:** to detect, prevent or stop fraudulent activities on the Site.

**Legal basis:** legitimate interest of the Controller and legal obligation.

3. Compliance with orders from judicial authorities

**Purpose:** to comply with legal obligations.

**Legal basis:** legal obligation.

4. Participation in the Call For Solutions Programme

**Purpose:** to know the data of the natural persons who will participate in the Call For Solutions programme.

**Legal basis:** the possibility of participation in the programme.

5. Automatically collected data

**Purpose:** to ensure and improve the web browsing experience.

**Legal basis:** the legitimate interest of the Controller.

6. Data provided voluntarily by the User,

**Purpose:** the purpose inherent in the request to enter that data.

**Legal basis:** User consent.

7. For cookies and plug-ins: see the cookie policy by clicking [here](#).

Consent for the purposes is optional and does not entail any negative consequences for Users' experience.

## 6. RECIPIENTS OF DATA

Within the limits of the processing purposes indicated, Users' data may be communicated to:

- subjects acting as data processors pursuant to art. 28 of the GDPR such as: partners, consulting companies, private companies, third party technical service providers, hosting providers, IT companies and/or communication agencies;
- bodies or authorities for which it is strictly necessary to disclose Personal Data
- internal subjects authorised by LVG and/or belonging to other companies connected to the Controller.

## 7. TRANSFER OF DATA TO A THIRD COUNTRY

LVenture Group may share some of the data collected with services located outside the European Union. In particular, through social plug-ins and the Google Analytics service. The transfer is authorized and strictly regulated by Article 45, paragraph 1 of EU Regulation 2016/679, so it does not require specific authorizations.

## 8. RETENTION PERIOD

According to the principle of storage limitation (Art.5, GDPR), the verification of the obsolescence of the stored data in relation to the purposes for which they were collected is carried out periodically.

In particular:

- a) automatically collected data are processed, for the time strictly necessary, for the sole purpose of obtaining statistical information on the use of the platform and to check its regular operation, including for security purposes or in accordance with the deadlines laid down by law.
- b) the data provided voluntarily by the User will be stored for a period of time not exceeding the achievement of the purposes for which they are processed or in accordance with the deadlines provided for by law.

## 9. RIGHTS OF THE DATA SUBJECT

The Data Subject shall always have the right to request from the Data Controller access to his/her data, its rectification or erasure, the restriction of processing or the possibility to object to processing, to request data portability, to withdraw consent to processing by asserting these and other rights provided by the GDPR by simply notifying the Data Controller. In any case, the Data Subject may also lodge a complaint with a supervisory authority.

The interested party may forward such requests to the following e-mail address: [info@lventuregroup.com](mailto:info@lventuregroup.com)

## 10. DATA PROCESSING METHODS

The personal data provided by the Users will be processed in compliance with the aforementioned regulations and with the obligations of confidentiality that inspire the activity of the Data Controller. The data will be processed by computer, on paper or on any other suitable medium, in compliance with the appropriate security measures pursuant to Article 5(1)(F) of the GDPR.

#### 11. **FINAL NOTES AND HOW TO UPDATE**

This information is provided only for the Site and not for other websites that may be consulted by the User via links contained in the Site. The information may be subject to change due to the introduction of new regulations in this regard. The User is kindly invited to periodically check the Privacy Policy in order to keep updated.

*Last updated 25.06.2021*