

Privacy Notice

pursuant to Articles 13 and 14 of the Regulation (EU) 679/2016 ("GDPR")

6 April 2022

Introduction

This page describes the features of the processing of personal data of users (the "**Users**") of the website <https://www.wethod.com/> (the "**Website**") and of the online platform, accessible through authentication to the same website, in order to use Wethod SaaS services (the "**Platform**").

The information on this page is not applicable to websites, apps and contents of third parties in general, not even if accessible from the Website. In these cases the provisions for the protection of such third parties' data shall be applicable, which may be different than the provisions hereof and which are recommended to be referred to before providing any data.

1 Data controller and Data Controller contact data

The data controller is the company **Wethod S.r.l.**, an innovative start-up operating in the project management sector and, more specifically, in the development of IT systems for the streamlining and management of project activities and human resources.

WETHOD S.R.L., with registered office in Roncade (TV), 31056, Via Sile n. 41, Tax Code and VAT Number 04732090263 (hereinafter referred to as “**Wethod**”, the “**Company**”, or the “**Data Controller**”).

In case of any doubt about how personal data are processed by the Company, please contact the same:

- by email to info@wethod.com
- by mail to Via Sile n. 41, 31056, Roncade (TV).

2 Data collection and type of processed data

Navigation data automatically collected by the Website: access and navigation data

When Users access the Website, the IT systems and software procedures based on which the Website operates acquire, during their standard operation, access and navigation data (for example: IP addresses or the domain names of the computers used by Users, URI – Uniform Resource Identifier – addresses of the resources requested, time of the request, method used in submitting the request to the server, size of the file obtained in response to the request, the numeric code indicating the status of the response provided by the server and other parameters relating to the operating system and the IT environment of the User – the “**Navigation Data**”).

Data provided by Users to contact the Data Controller: personal information, contact data and personal data voluntarily provided by Users

Through the Website it is possible to contact Wethod, by (i) entering one’s own email address in the Website section “Email us”; (ii) entering one’s own email address to obtain a demo version of the Platform software and/or (ii) through the “Chatbot” function on all the Website pages, to request any information or clarification relating to the services provided through the Platform. The data requested are exclusively the User’s email address and any data voluntarily provided in the message accompanying the email and/or the chatbot message.

Pursuant to Article 14 of the GDPR, we hereby inform you that if Wethod is contacted through the social networks, the Request Data may be also provided through such social networks and in this case the entity that sends us the Data will be the data controller of such social networks, which processes the users’ personal data in accordance with the information existing on their website.

The provision of the Request Data takes place on a voluntary basis: if Users do not provide such data, they may still navigate on the Website, however without receiving any response to their requests and without obtaining any information or clarification they wish to receive from Wethod.

Users are invited not to provide third party personal data unless this is required (for example, because the Users who want to receive information from Wethod do not have their own email address and do not have any other direct contact address): in this case, we remind that the Users

have to fulfil the personal data protection law obligations and, in particular, have to inform the third parties about the data provision and collect their consent, should that be the case.

Data provided by Users: personal or contact data for the creation of the Wethod Account: personal data and contact data

In the Website section “Try it now” you may start the registration on the Platform where the User is requested, subject to prior acceptance of the **SaaS License Terms and Conditions** and of this privacy policy, to provide specific personal data: name, last name, email address and team name, where applicable. Such data is requested, in particular, for the registration of an account that allows to access a reserved area thanks to which it is possible to use the services (the “**SaaS Services**”) relating to the Platform use. Subject to the foregoing, the SaaS Services can be used by Users also by entering the data relating to their credit card and after payment of the subscription plan selected – except for the free subscription –, in accordance to the **SaaS License Terms and Conditions**.

The provision of such data takes place on a voluntary basis: if Users do not provide it, they can still navigate on the Website without benefiting from the functionalities of such area and of the SaaS Services. Moreover, such data is collected to the extent that and how such data is provided by the same Users.

Users are invited not to provide third party personal data unless this is required (for example, because the Users who want to access to the reserved area do not have their own email address and do not have any other direct contact address): in this case, we remind that the Users have to fulfil the personal data protection law obligations and, in particular, have to inform the third parties about the data provision and collect their consent, should that be the case.

Data provided by Users to receive the newsletter: email address

Users may register at Wethod newsletter services, by entering their email address in the specific box in Website footer. Such data is requested, in particular, for the purpose of allowing the User to benefit from such service and, therefore, to receive by email updates on the Platform functions and features and on the SaaS Services.

The provision of such data is necessary: any refusal to provide such data will not allow Wethod to send the newsletter to the User.

(The data relating to the foregoing paragraphs hereinafter jointly referred to as “**Data**”)

3 Legal basis and purposes of data processing

The **Navigation Data** will be used: (i) for the purpose of monitoring the proper operation of the Website, (ii) in aggregate and unidentified form, for statistical purposes related to understanding how the Website is used by Users, in order to make its access easier and increase its attractiveness (iii) to detect any technical issue as soon as possible.

The legal basis of such data processing is the Data Controller’s legitimate interest in improving its digital services, which is compatible with the data subjects’ position as: (a) the monitoring of the Website operation and the statistical data related to its use do not involve a direct identification;

and (b) the interest of the Company reasonably seems to correspond also to the interest of Users, who may thus use an increasingly performing and optimized Website.

The **Data provided to contact Wethod** will be used to respond to the requests made by Users and/or to provide the demo version of the Platform management software.

The legal basis of such processing is to enforce pre-contractual measures (e.g., reply to specific clarifications requested about the SaaS Services) adopted on the User's specific request.

The **Data provided for the creation of the account** shall be used for the purpose of allowing the creation of a User account, which enables the access to a reserved area through which the User may use Wethod SaaS Services. It should be noted that the email included in the Account Data shall also be used to send information exclusively about the progress of the updates and operating functions of Wethod SaaS Services.

The legal basis of such processing is to enforce a contract to which the User is a party (i.e. the **SaaS License Terms and Conditions**).

The **Data provided to receive the newsletter** shall be used for the purpose of sending emails to the User about the updates on the Platform functions and features and on the SaaS Services, as well as on Wethod activities, so as to evaluate the opportunities provided by the Platform from time to time.

The legal basis of such processing is to enforce pre-contractual measures adopted on the User's specific request. The *Newslettering* service may be disabled by the recipient by clicking "UNSUBSCRIBE".

4 Data Recipients

The Data will be provided to and may be known by (i) the Data Controller's employees and collaborators, duly instructed about the data processing; and (ii) third parties providing ancillary services or services instrumental to the Data Controller's activity - in relation to the development, performance and operating management of the Website, of the reserved area and of the SaaS Services - , specifically appointed as data processors (or sub-processors).

5 Place of Data processing and transfer of Data to foreign countries

The processing of the User Data shall take place at the aforementioned Company's registered office, and the Data shall be retained in the servers located within the European Union.

Any further transfer of Data to foreign countries shall take place, if to Countries not benefiting from any European Commission adequacy decision and, consequently, not providing an adequate level of personal data protection, only and solely (i) subject to prior adoption of adequate guarantees like, by way of example without limitations, the stipulation of the relevant clauses approved by the European Commission, or (ii) upon occurrence of a derogation of the prohibition of transfers outside the European Union and, therefore, again by way of example without limitations, subject to prior reception of the explicit and informed consent of the User, or only to the extent that it is necessary for the performance of an agreement entered into between the User and the Company, or between the Company and a third party to the User's benefit, or upon enforcement of pre-contractual measures adopted on the User's request.

6 Processing modes, security measures and Data retention period

Data will be processed both on paper and by means of digital, computer or automated tools, through systems ensuring their protection, security and confidentiality.

The Data Controller also adopted specific and adequate, logic, legal, organizational and technical security measures to prevent loss, unlawful or unauthorised use of Data and unauthorised access to Data.

Navigation Data – not allowing User identification – are retained for max. 7 days and are immediately deleted after their aggregation (subject to any required assessment of any offences by the competent Judicial Authority).

Data having the purpose of responding to Users' requests shall be retained for 12 months after reception of the relevant request.

Data having the purpose of responding to Users' requests to register to the Platform and to use the Wethod SaaS Services shall be retained for the entire duration of the agreement term and for the limitation period envisaged by the applicable legislative provisions.

Data provided to receive newsletters shall be retained and processed for 24 months after subscription.

Data shall be retained for a longer period of time if this is necessary to perform any statutory and/or legal obligations as well as to ensure legal protection of the Company's rights, in compliance with the ordinary limitation terms.

7 User's rights

Users, as data subjects (i.e. subjects to whom Data refers), also hold the rights assigned by the GDPR. More specifically, pursuant to articles 15-23 of the GDPR, the data subjects shall have the right to request and obtain, at any time, access to their personal data, information about the processing, rectification and/or update of personal data, erasure or restriction of processing. Moreover, they have also the right to object to processing and to request data portability (i.e. to receive personal data in a structured, commonly used, machine-readable format). Finally, data subjects have always the right to revoke their consent at any time – where provided – (in any case, this shall not affect the lawfulness of data processing made based on the consent given before its revocation) and to file a complaint to any personal data protection authority (in Italy: the Personal Data Protection Authority).

The aforementioned rights may be exercised at any time, by simple request to the Data Controller, to be sent:

- by email to info@wethod.com
- by mail to Via Sile n. 41, 31056, Roncade (TV).

For any other information or clarification about the aforementioned rights, you may contact the Data Controller at the same addresses.

8 Cookie policy

The purpose of this Cookie Policy is the following:

- to describe the types and terms of use of the cookies existing on the Website and on the Platform; and
- to provide Users with information about how to refuse or delete such cookies, if requested.

Cookies are small text strings that are sent by the websites visited by Users to the browser of their PC, where they are stored and subsequently resent to the same websites the next time the Users visit the website. This makes the internet navigation experience smoother and more customized.

During website navigation, Users may receive on their PC “first-party” cookies, when cookies are directly managed by the website owner and/or manager, as well as cookies that are sent by different websites or web servers (so-called “third-party” cookies); this occurs because on the visited website there may be elements that reside on servers other than the one on which the Website is residing, set up by a website other than the one you are currently visiting.

With reference to the purposes pursued by the data controller, cookies may be (a) technical; (b) analytic, and (c) profiling cookies.

(a) Technical Cookies

Description

Technical cookies are used only for the purpose of sending any communication through an electronic communication network, or to the extent that is strictly necessary for the web service provider to provide a service explicitly requested by the user.

The use of session cookies, that are not permanently stored in the user’s PC and are deleted when the browser is closed, is strictly limited to the transmission of session identification data (i.e. casual numbers generated by the server) required to allow a secure and effective Website browsing; this allows, for example, to use a service or to log in to access reserved areas.

The prior consent of users is not required for the installation of such cookies.

Which are the technical cookies on the Website?

The Website uses the following technical cookies:

Cookies	Domain	Process data	Purposes	Cookie retention term
__stripe_mid	.stripe.com		Make payments through Stripe	1 year
__stripe_sid	.stripe.com		Make payments through Stripe	1 year
SFSESSID	.wethod.com		Recognize an authenticated user	7 days
intercom-session-hxp3wz3i	.wethod.com		Recognize the user and remember the chats occurred through Intercom	7 days
intercom-id-hxp3wz3i	.wethod.com		Identify an unknown visitor	9 months
SEARCH_SAME SITE	.google.com		Used by Google to prevent the browser from sending cookies for cross-site requests	6 months

(b) Analytic Cookies (so-called *analytics*)

Description

Analytic cookies are used to collect information on, analyse and measure, in an aggregated form, the number of Users and how Users visit the Website. These cookies do not collect personal data, but exclusively data in anonymous and / or aggregate form, which in any case are not shared with third parties.

Which are the analytic cookies on the Website?

The Website uses the following third party analytic cookies.

Cookies	Domain	Process data	Purposes	Cookie retention term
_gat	.wethod.com		Used by Google Analytics for the throttling of requests	1 minute
_gid, _ga, DV	.wethod.com		Used by Google Analytics to differentiate Users	1 minute

(c) Profiling Cookies

Description

These cookies allow to create a User profile based on Users' Website navigation experience and habits. In this way it is possible to display advertisements tailored to the users' specific interests during navigation instead of general advertisements.

Which are the profiling cookies on the Website?

The Website does not use first-party profiling cookies.

Conversely, it should be noted that the Website uses the following third-party profiling cookies:

Cookies	Provider	Domain	Processed data	Purposes	Cookie retention term	Privacy policy
AnalyticsSyncHistory	LinkedIn	.linkedin.com		Save information about the date on which a synchronization with the cookie lms_analytics took place	30 days	https://www.linkedin.com/legal/privacy-policy
UserMatchHistory	LinkedIn	.linkedin.com		Advertisements on LinkedIn	30 days	https://www.linkedin.com/legal/privacy-policy
lang	LinkedIn	.linkedin.com		Remember user's language settings	Session	https://www.linkedin.com/legal/privacy-policy
li_gc	LinkedIn	.linkedin.com		Save hosts' consent in relation to the use of	2 years	https://www.linkedin.com/

				cookies for non-essential purposes		legal/privacy-policy
SSID	Google	.google.com		Advertisements on Google	2 years	https://policies.google.com/privacy
HSID	Google	.google.com		Advertisements on Google	2 years	https://policies.google.com/privacy
SID	Google	.google.com		Advertisements on Google	2 years	https://policies.google.com/privacy
CONSENT	Google	.google.com		Advertisements on Google	2 years	https://policies.google.com/privacy
SIDCC	Google	.google.com		Advertisements on Google	1 year	https://policies.google.com/privacy
__Secure-3P SIDCC	Google	.google.com		Advertisements on Google	1 year	https://policies.google.com/privacy
__Secure-3P APISID	Google	.google.com		Advertisements on Google	1 year	https://policies.google.com/privacy
SAPISID	Google	.google.com		Advertisements on Google	1 year	https://policies.google.com/privacy
APISID	Google	.google.com		Advertisements on Google	1 year	https://policies.google.com/privacy
__Secure-3P SID	Google	.google.com		Advertisements on Google	1 year	https://policies.google.com/privacy
__Secure-3P SID	Google	.google.com		Advertisements on Google	1 year	https://policies.google.com/privacy

Finally, it should be noted that the so-called *social buttons* on the Website home page are solely mere links to external pages of the relevant social networks, that do not install cookies.

(d)How personal data is provided by Users

Users authorise the use of cookies by continuing their navigation, after reading the relevant banner on the home page. The provision of data is optional.

It is possible to modify the preferences relating to cookies at any time by means of specific browser configurations, according to the specific procedures described below. Through the browser preferences it is also possible to remove the cookies previously installed, including the cookie in which the consent to the installation of cookies may be saved by the Website.

If the Users decide to disable the cookies (even technical cookies), they will not have access to many features that make this Website more efficient and some of the Company's services accessible through the Website will not operate properly.

With regard to third-party cookies, Users may also exercise their right to object to personal data processing by obtaining information through the third party's privacy policy, through the opt-out link

if explicitly provided in the aforementioned privacy policy or in the cookie policy, or by directly contacting the same third party.

(e) Options for the use of cookies

It is possible to check the cookies through the settings of the browser used. Since each browser has different functions, Users shall check the “help” menu of their browser to understand how to correctly change the cookies settings.

Users may change the browser settings so that cookies are deleted or are not saved on the PC or mobile device without their explicit consent. Users may better understand how to set their browser at the following links:

- Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: https://support.mozilla.com/en-US/kb/cookies-information-websites-store-on-your-computer#w_cookie-settings
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Safari: <http://support.apple.com/kb/PH504>

For any other information about cookies, Users may refer to the website www.allaboutcookies.org

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The Data Controller may amend this privacy notice to adapt it to any future upgrades of or changes to the Website.