# **PRIVACY POLICY**

This privacy policy describes the processing of the personal data of visitors to the "maize.PLUS – Learning is human" website owned by Maize S.r.l., available at the domain https://plus.maize.io/ (the "Website"), where Maize S.r.l. provides additional information about its "maize.PLUS" e-learning platform (the "Platform").

This policy is provided solely in relation to data processed via the Website for the purposes identified in point 3. It does not relate to any other websites consulted and/or that can be consulted through links and/or widgets (e.g. social networks). Such other websites process personal data as independent controllers, in compliance with their respective privacy policies that users are warmly invited to consult.

Maize S.r.l. may amend this policy for consistency with future extensions of or changes made to the Website and/or the services offered. In the event of substantial changes, Maize S.r.l. will publish a notice on the Website about them and collect any requests to exercise the rights granted by the legislation on the protection of personal data.

#### 1. DATA CONTROLLER

The data controller is Maize S.r.l., with registered offices at Via Sile 41, Roncade (TV), Tax Code and VAT no. 07751720017 ("H-FARM Innovation").

### 2. DATA COLLECTED

### 2.1 Data provided by the User

The personal data processed via the Website comprises solely the personal data provided by you when asking for further information on our Platform via the specific "Call for a demo" or "Request your demo functions (the "Data").

In particular, the Data comprises your identification and contact details (e.g. name, e-mail address, employer) and any other personal data included in your message submitted to the questions box, which you can send to H-FARM Innovation before making an appointment with our contact person.

H-FARM Innovation will process the Data that is strictly necessary and reserves the right to delete or anonymize immediately any Data that is not necessary.

In all cases, please do not send the personal data of third parties to H-FARM Innovation, unless strictly necessary to achieve the purposes of processing: in that case, you are responsible for informing those third parties about the communication of their data and giving them this policy.

### 2.2 Browsing data

Whenever the Website is visited, systems automatically record and analyze your browsing data (e.g. information on the browser used, visited pages, date, time and duration of each visit – the "**Browsing Data**"). This information is collected automatically by the Website and does not require any action by you. In all cases, the Browsing Data is collected by the Website solely in an anonymous and aggregated form and, therefore, cannot be used to identify you. The information collected merely facilitates the identification and resolution of any technical problems with the Website or the improvement of its usability.

### 3. PURPOSES OF PROCESSING

The Data is processed by H-FARM Innovation, in strict compliance with the applicable data protection regulations and the instructions given by the competent supervisory authority for the protection of personal data, for the following purposes.

# Reply to your requests: make an appointment

Your Data will be processed in order to reply to your request to make an appointment with our contact person for further information about our Platform and obtain a demo ("Call for a demo" or "Request your demo): your request must contain your Data, so that H-FARM Innovation can reply to you.

The lawfulness of this processing is founded on the need for H-FARM Innovation to carry out pre-contractual actions at the request of the data subject.

The provision of Data is voluntary, but necessary: any refusal will make it impossible for H-FARM to make an appointment with an authorized contact person and give you any information requested on the Platform.

#### 4. PROCESSING METHODS AND DATA RECIPIENTS

The Data will be processed both manually and electronically by employees and collaborators of H-FARM Innovation and/or companies expressly appointed as processors. H-FARM Innovation has provided these parties with detailed operating instructions, with particular reference to the adoption of adequate technical and organizational security measures. They include:

- Calendly LLC., with registered office at 271 17th St NW, Ste 1000, Atlanta, Georgia, 30363, United States, a company whose service updates automatically the calendars of persons interested in making an appointment. In this context, Calendly LLC., as an authorized processor, may transfer the Data outside of the European Union. Although the United States does not guarantee a level of data protection similar to that guaranteed in EU member countries, the transfer of data is based on the standard contractual clauses approved by the European Commission, included in the processor agreement signed between H-FARM Innovation and Calendly LLC (available at the website: https://calendly.com/dpa), and the organizational, technical and security measures implemented by Calendly LLC (available here: https://calendly.com/security);
- parties that provide services for the management of the IT system and telecommunications networks of H-FARM Innovation;
- parties that check, audit and certify the activities organized by H-FARM Innovation, including in its own interests.

The full list of recipients of your Data is kept at H-FARM Innovation's headquarters and is available on request. This request can be sent to the addresses indicated in point 6 below or by contacting the Data Protection Officer at the addresses mentioned in point 7.

#### 5. RETENTION PERIOD

The Data collected and processed by H-FARM innovation for the purpose specified in point 3 above, i.e. to reply to your requests, may be retained in a form that allows your identification for the period needed to reply properly to your request and, in any case, for a maximum period of 12 (twelve) months from the last contact made with you.

Your personal data may be kept for longer periods when necessary to fulfill legal obligations or protect H-FARM Innovation's rights, until the relevant statutory time limit is reached.

# 6. YOUR RIGHTS AND H-FARM INNOVATION'S CONTACT DETAILS

At any time and in so far as the rights are applicable, you may: (i) obtain access to your personal data; (ii) obtain rectification, erasure or restriction of the processing of your personal data; (iii) lodge a complaint with the competent supervisory authority for the protection of personal data, or appeal to the competent judicial authority.

You can send requests to exercise the above rights to one of the following addresses or to the Data Protection Officer at the addresses mentioned in point 7 below:

- by e-mail to the address: privacy@maize.io;
- by registered letter to Maize S.r.l., Via Sile 41, 31056 Roncade (TV), Italy.

Requests for further information about this privacy notice may also be sent to the same addresses.

## 7. DATA PROTECTION OFFICER

The Data Protection Officer (DPO) appointed by H-FARM Innovation is LCA Servizi S.r.l., and can be reached at the following addresses: Via della Moscova 18, 20121, Milan; e-mail: dpo@lcalex.it, or certified e-mail (PEC): lcaservizi@pec.lcaservizi.it.

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### **COOKIE POLICY**

Cookies are small text strings that the websites you visit send to the browser on your device, where they are stored for retransmission to the same websites when you visit them again. While browsing a website, your device may receive "first-party" cookies managed directly by the owner and/or administrator of the website, as well as cookies sent from other websites or web servers (i.e. by "third parties"). This happens because there may be elements on the website visited (e.g. icons linking you to the various social networks) that reside on servers other than the one where the website is located.

Depending on their type, cookies may be used for technical, analytical or profiling purposes. The Website uses the following types of cookie for the purposes indicated below.

# **Analytical cookies**

Analytical cookies are used to collect information, in an aggregate form, about the number of users who browse the Website and how they visit it. This data is collected in an anonymous form and cannot be used, directly or indirectly, to identify the user.

The Website uses the following third-party analytical cookies (Google Analytics):

Cookie	Domain	Purpose	Duratio	Means of removal
			n	
_ga	.maizeplus.io	Store and count page views.	2 years	https://support.google.com/analytics/answer/
				9019185?hl=it&ref_topic=2919631
_gat_g	.maizeplus.io	Store a unique user ID.	1 minute	https://support.google.com/analytics/answer/
tag_U A_*				9019185?hl=it&ref_topic=2919631
_gid	.maizeplus.io	Store and count page views.	1 day	https://support.google.com/analytics/answer/
				9019185?hl=it&ref_topic=2919631

Alternatively, you can download and install the browser plug-in available at the following link https://tools.google.com/dlpage/gaoptout?hl=en-GB to prevent Google from recording the data obtained via these cookies.

Last updated: February 18<sup>th</sup>, 2022