

Privacy Policy

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I. What is a privacy policy for?

I.A. Principles

Fresh Fund Management srl (FFM) is committed to protect your personal data online in accordance with privacy regulations. It also undertakes to respect image rights (see part [B. Legal notice](#)). This policy governs all the pages of the websites and mobile application managed by FFM.

FFM uses the information it collects about you to communicate with you, better understand how its website (including its mobile applications) or its services are used and to you send information likely to interest you (see parts [II](#) of this policy).

There are several other names for this policy – “privacy statement”, “data protection policy” or sometimes, just “privacy”. Their objective remains the same: to inform users about the use of their private data.

FFM invites you to read the policy developed below to find out how your personal data will be processed.

This privacy policy is a document setting out how FFM collects, uses, and communicates data. It aims to fulfil four roles:

1. Inform users about the collection and use of their personal data.
2. Give users a choice of opting out of collected data.
3. Give users access to collected data or challenge its accuracy.
4. Provide users with security of their data.

All of these measures help to ensure that your personal data will not be sold to third parties or used for malicious purposes.

I.B. Legal Notice

I.B.1. Privacy regulations

FFM uses your data in accordance with the regulations relating to privacy, i.e. in particular the following legal texts:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95 /46/EC (General Data Protection Regulation, also known as “GDPR”).
- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (directive on privacy and electronic communications).
- The law of December 3, 2017, creating the Data Protection Authority.

I.B.2. Special laws

The laws relating to provisions will be indicated in the appropriate place as to the purpose to be achieved.

I.C. Privacy Policy Amendment

FFM reserves the right to modify this Privacy Policy to ensure compliance with the regulations relating to privacy in force or to adapt it to its practices. Therefore, it invites you to consult it regularly to find out about any changes. New versions will be uploaded to our website, updating the date in its last paragraph.

FFM will not make any changes likely to reduce the level of protection of your rights, as guaranteed in this Privacy Policy, without obtaining your prior consent.

II. Collection of personal data – Privacy charter

II.A. What is personal data?

“Personal data” (hereinafter “your data” when it concerns yours) represents any information relating to an identified or identifiable natural person or a legal entity (hereinafter referred to as “data subject”). A person who can be identified, directly or indirectly, by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more particular elements specific to his physical, physiological, genetic, psychic, economic, cultural, or social identity.

Personal data must be processed fairly, lawfully, and transparently with regard to the data subject, be collected for specified, explicit and legitimate purposes, be adequate, relevant, and not excessive, be accurate and kept in a form that allows identification of the persons concerned.

II.B. What personal identification information is collected about you?

The types and volume of information that FFM receives, and stores depends on how you use our website and other communication platforms. You can access most of our pages without indicating who you are or revealing any personal information.

In some cases, FFM asks you for this information to provide you with specific services or send you correspondence. The personal identification information you provide in this way will not be transmitted to any third party, except for the purpose of performing the requested service.

FFM does not collect personal data unless this information is disclosed voluntarily. By voluntarily entering into contact with FFM, you agree to the legitimate collection of data, such as: surname and first name of the person concerned, e-mail address, telephone number, message content, the moment (date and time), the e-mail header and any physical addresses mentioned as well as other personal data that you have provided to it.

On the one hand, the data that you voluntarily communicate to it come either, for example, from the creation of a personal account, or from participation in one of our questionnaires, or even from your registration for the one of its services (newsletter, etc.).

These include the following data in particular, depending on the purpose to be achieved:

- first and last name,
- pseudonym,
- e-mail address,
- date of birth,
- your city, country, and postal code of residence,
- the dates of your participation as well as the answers given in the context of our questionnaires.
- Identification number with the ECB for businesses

In addition, some data must be communicated, others are optional. In the first case, if you refuse to provide FFM with the data requested, you may be denied access to certain content and it may be impossible for you, for example, to answer certain questionnaires.

In order to facilitate your registration, sometimes you have the option of linking your Facebook, Google, or other account to your FFM account. In this case, some of the personal data that you have communicated to these third-party services (basic information, e-mail address, etc.) may be transmitted to FFM by the publishers of these third-party services. FFM invites you to familiarize yourself with and, where applicable, configure these third-party services with regard to the transmission of personal data concerning you.

By accepting this Privacy Policy when creating your account, you consent to your data being processed under the conditions and according to the methods specified in this Privacy Policy.

II.C. Who collects your information?

When you are on the FFM website or on any other communication platform dependent on it or on which its staff members are active, and you are asked for personal data, you communicate this data to FFM, and only to it, unless otherwise provided.

This is the case, for example, with online payments. When you use our form provided for this purpose, after having completed it with your personal identification information and validated, you are automatically transferred to the secure environment of a partner company, most often your own bank. This is a highly secure environment where you will be asked to enter your debit/credit card information.

II.D. What to do in case of identity theft, data theft or hacking?

FFM has taken all possible and relevant legal and technical measures to prevent unauthorized access and use of your data. Therefore, it declines all responsibility in the case of identity theft, data theft or computer crime. In the case of hacking of our IT systems, FFM will immediately take all possible measures to limit the damage and/or theft to a minimum, and it will inform you of the data affected and to what extent it is affected.

In the case of identity theft, data theft or computer crime, FFM invites you to write to FFM at **support@Infound.com** as well as the competent authorities. Once the complaint has been received by FFM and unless otherwise instructed by the said authorities, FFM will keep the data in question for a period of two years.

II.E. How does FFM use your data?

FFM does not distribute, sell, or rent user information to anyone. It uses data about you to better understand the people who visit its websites (including social networks, blogs, forums, etc.), applications and other technological and communication devices. It also uses your data to be able to send you information to which you have subscribed, or which may be considered to be of interest to you.

If you owe a sum to FFM your data may be partially transmitted to third parties for purely technical and administrative processing. These third parties are not authorized to distribute, sell, or rent your data.

II.E.1. The purposes of processing your data

FFM processes your data only for specific, explicit, and legitimate purposes aimed at:

- Allow the conduct of the questionnaire in which you participate.
- Manage the FFM relationship with you, manage advertising for its services or those of the FFM partners, or even those of third parties: for example, it must collect and use your data to send you its newsletters and keep you informed of its competitions, coupons maps and other information likely to interest you.
- Individualize your experience by recommending content likely to interest you based on your areas of interest, your age category, and your previous use of its services.
- To know your preferences and your habits as well as possible in order to allow it to personalize its offer and, ultimately, to offer you content, including advertising, which better corresponds to your profile.
- Offer personalized content and adapt its websites and services as well as the content and advertising it offers (i) to the characteristics that you have provided yourself and of which we may become aware (age, sex, etc.) and, if applicable (ii) to your previous browsing of which he may have knowledge.
- Improve its content based on information on who consults and how its content is consulted.
- Evaluate the effectiveness and user-friendliness of the FFM websites and other technological devices, as well as their improvement, for the benefit of our Internet users and users.

- Carry out internal statistical surveys and market studies: for example, to assess your interests and to better define the development of questionnaires, services, and communication strategies.

II.E.2. Duration of retention of your data

FFM only keeps your data for a period not exceeding that necessary with regard to the purposes for which they are processed and in accordance with legal requirements.

II.E.3. Communication of your data

FFM may communicate your data to its administrations and partners, to accomplish exactly the same purposes as those developed above, provided that the sharing of information is fair and lawful, in order to achieve a specific, explicit, and legitimate purpose.

In order to make you discover products or services likely to interest you, FFM may also communicate your data to other third-party companies, provided that you have given your explicit consent.

Your data may be transmitted to persons acting in the name of FFM or on its behalf, with a view to processing in accordance with the purposes for which they were collected (for example, a company that will send the newsletters). FFM ensures that its own subcontractors guarantee an adequate level of protection, i.e. it requires a contractual guarantee that its subcontractors will process your data exclusively for the authorized purpose, with discretion and security required.

II.E.4. Right of access, rectification, and opposition

FFM makes it a point of honor that you retain control of your data. This is why you can at any time correct, complete or delete the data that you have communicated to it by logging into your personal account.

Otherwise, in accordance with the regulations relating to privacy, you have the right at any time to exercise your rights of access, rectification, opposition, limitation, deletion.

II.E.5. Security and confidentiality of your data

Access to your data is limited to members of FFM staff who need to know it and who observe strict confidentiality standards in the processing of your data.

To guarantee the security and confidentiality of your data, FFM has implemented the highest security standards and only works with subcontractors who are also subject to them. Despite the resources deployed to create a reliable and trustworthy website, FFM would like to point out that the internet is not a perfectly secure environment. Consequently, FFM does not assume any responsibility or guarantee as to the security of your data during their transit via the Internet.

II.E.6. Transfer of your data outside the European Union

In accordance with the privacy regulations, personal data may only be transmitted to countries which guarantee an adequate level of security and comply with the same or equivalent provisions as the privacy regulations. The country, the duration of the transmission and storage, the nature of the data and the exact purposes, are criteria that must be examined on a case-by-case basis.

FFM guarantees to refrain from activating the processing or storage of data in countries which cannot offer the same guarantees, unless:

- the person concerned has explicitly given his consent.
- the transmission is necessary for the performance of the contract (between the User and FFM).
- the transmission is necessary for the end, or the execution of a contract concluded or to be concluded between the controller and a third party in the interest of the User.
- the transmission is necessary or is a legal obligation (important public interest or right).
- the transmission takes place from a public register aimed at informing the public.

II.E.7. Sending advertising by e-mail and any other means of communication

FFM will be happy to share with you by e-mail and/or any other means of communication (Facebook, X (ex Twitter), Instagram, forums, etc.) its newsletters, competitions, tips, or other information likely to interest you.

Of course, you have the right at any time to object, free of charge, to the use of your personal data in order to receive advertisements from FFM, its administrations, partners, or third-party companies. To oppose any subsequent sending of such communications, simply send an unsubscribe email or change your account settings.

Only if you have consented, we will transmit your e-mail address and/or other relevant personal data to our partners and other third-party companies in order for them to send you offers of products or services which may interest you.

II.E.8. Hypertext links to other websites

The FFM websites and its services may contain hypertext links to other websites that are neither operated nor controlled by FFM. Consequently, FFM cannot be held responsible for the content of such websites, nor for the data protection practices of the third parties that operate them, and which may differ from ours.

III. Data controller

Fresh Fund Management srl is the legal responsible for the use of the user's personal data. FFM act as data controller. To contact the data controller:

FFM email address : support@Infound.com

Next to FFM, the de facto controller in this matter, Ingenium, also offers sufficient guarantees with regard to technical and organizational security measures relating to data processing.

If you would like to receive additional information or make a complaint about privacy or security checks, you can contact FFM to the mentioned email address.

In order to proceed as well as possible according to your request, be sure to specify the object of your request.

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