

PRIVACY POLICY

Last Updated: October 7th, 2022

Maawi S.r.l (“**Maawi**” or “**we**”, “**us**”, “**our**”) recognizes that your privacy is very important and we take it seriously. Maawi commits to protect and respect your privacy and to provide you with all required information concerning the processing of personal data that we collect about you or that are otherwise provided to us, in compliance with the relevant applicable data protection laws.

This privacy policy (“**Privacy Policy**”) informs you about our policies and procedures regarding the collection, use, protection and disclosure of your personal information we receive from your use of the Maawi platform (the “**Platform**”) or otherwise as hereinafter better detailed. This Privacy Policy also tells you about your rights and choices with respect to your personal information, how you can reach us to update it or get answers to questions you may have about our privacy practices.

First of all, definitions of the key words contained in the Privacy Policy are provided below:

- Personal data: any information relating to a natural person who is identified or identifiable, including indirectly, by making reference to any other information, including a personal identification number or an online identifier;
- Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means (e.g. the collection, registration, storage, consultation, processing, modification, use and disclosure of information);
- Controller: natural person or legal entity, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data (in this case, Maawi);
- Processor: natural person, legal entity, public authority, agency or other body appointed by the controller to process personal data on behalf and in the interests of the controller;
- Data subject: the party to whom the personal data refers.

For the purposes of this Privacy Policy, the data controller is Maawi S.r.l. having its registered office in Vicolo Santa Maria alla Porta no. 1, 20123 Milano, C.F. e P. IVA n. 09559670964.

YOUR INFORMATION SUBJECT TO COLLECTION AND PROCESSING

1. Information that you provide to us directly

We collect information that you provide when you set up your Maawi account, such as your name and surname, address and email address, date of birth, username and password and any other personal information that you choose to add to your profile.

In addition, we collect the information that you share by using the Platform, e.g. contents created or published through the Platform, messages and communications, imported or uploaded images, photos and videos as well as associated metadata (such as when, where and by who the content was created). If you choose to import your contact, we will collect information from your device’s contact book or your social media contacts so that it will be easier for you and your contacts to connect and interact in the Platform.

By using the Platform, you may also choose to share sensitive data that are subject to special protection under the applicable laws, e.g. racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information relating to your health. Considering the particular relevance of such personal data under the applicable laws, we kindly invite you not to share such data through the Platform.

You can also choose to participate in one of our surveys, marketing campaigns or events and in such case we will collect the information that you will share with us in such contexts.

If you need to contact us, we will collect the information that you will decide to share with us in order to process to your request and reply to you. Please be aware that, depending on your requests, we may require you to provide us some necessary personal information, such as name, email and/or proof of identity or age, in order to detect and avoid possible violation of policies and terms and conditions of the Platform or applicable laws and regulations.

When you sign up for a Maawi account, you will be asked to provide your consent to the processing of your personal data for the purposes laid out in this Privacy Policy; however, if you communicate with us by email or in another manner before having expressed your consent to the processing of your personal data according to this Privacy Policy, we will process the data that you voluntarily provide us only to give you a response to your request.

You are always free to decide whether to provide your personal data or not. However, any refusal to provide the information necessary for using the Platform (eg. log in data) or necessary to reply to your requests may prevent us from providing you the relevant service.

2. Navigation data

Every time you use the Platform, the following data will be gathered automatically:

- technical information, such as device and network connection information related to your access to the Platform, information related to the performance of the services provided through the Platform, crash report, performance logs, log history. In addition, when you will first log in to the Platform, you will be automatically assigned with a device ID and user ID and such information will be used to identify your activity when you use Platform through different devices;
- information about how you use the Platform and the relevant features, such as people and accounts you interact with and time, frequency and duration of your activities, data on the series of clicks generated (clickstream), the content you view or your search history on the Platform and your settings;
- your approximate location based on technical information in order to customize your experience or for diagnostic and troubleshooting and, subject to your consent, we may also collect your exact location for the purposes of providing you with the Platform's location features.

Navigation information is not collected with the primary aim of identifying users, however due to its very nature it may allow for the identification of users.

3. Information that others provide to us directly

We receive and analyse information that other users share with us while using the Platform that might include information about you, such as when others comment your contents or send message to you or when they send a complaint or feedback that may regard you or when other connect their device's phone book or social media contacts to the Platform.

We receive also information from third-party platforms for example when you decide to sign-up for a Maawi account using a third-party platform. To learn more about the information shared in such cases and how to limit it please refer to the following section "*Social plug-ins and relations with social networks*".

COOKIES

In case you visit the website of the Platform, please be aware that we use cookies. For detailed information on cookies and the reasons they are used, please refer to our *Cookie Policy*.

PURPOSES AND LEGAL BASIS OF PROCESSING

Personal data will be processed for the purposes described herein below and according to the following legal basis.

- A. Contractual necessity.** We use your personal data in order to:
- a. provide you with the Platform's services according to the Platform's Terms of Use and policies, such as allow you to access your personal area and use the Platform, enabling you to create and share contents, interact with other users and their contents, personalize content on the Platform on the basis on your preferences or interests;
 - b. enforce Platform's Terms of Use and policies, such as removing contents, suspending or banning accounts;
 - c. administer our Platform and for internal operations, including checking the proper functioning of the Platform and resolving problems;
 - d. communicate with you on service-related matters and respond to your requests.
- B. Legitimate interest** whether belonging to us, you or a third party to the extent that your interests or fundamental rights and freedom will not prevail. We use your personal data in order to:
- a. suggest your account to other users, and vice versa, for the purposes of quickly connect and interact with them;
 - b. provide you with non-personalized advertising for the purposes of suggesting gifts and present ideas to the user and to keeping the Platform free of charge;
 - c. provide interactive features, such as those with social networks, for the purposes of improve your experience;
 - d. ensure that our Platform content is presented in the most effective manner for you and your devices, by continuously improving the navigation experience, design and layout of the Platform, including testing and troubleshooting new products and features;
 - e. obtain anonymous statistical information on the use of the Platform, data analyses, research and statistical purposes so that we can improve and provide Platform's services in any informed way;
 - f. send you marketing communications related to the Platform and its features for the purposes of permitting the users to be informed on the Platform, the relevant services and benefit from a full experience;
 - g. send promotion, contests, marketing campaign or events related to the Platform for the purposes of promoting new development and features of the Platform's services;
 - h. measure the effectiveness of the ads you see on the Platform for the purposes of enabling advertisers to view and understand the performance of their ads and making informed decisions as well as keeping the Platform free of charge;
 - i. guarantee our Platform's safety and security, including technical and security issues or problems, for all the users and prevent any misuse of the services of the Platform;
 - j. law enforcement related purposes or to respond to legal requests;
 - k. ascertain liability in the case of any fraud, unauthorised use of the Platform, violation of our terms and polices or illegal activities or cybercrimes or other acts detrimental for our Platform.
- C. Your consent.** We use your personal data in order to:
- a. send you marketing communications regarding our own products and services or those of third parties and business partners;
 - b. to serve you with personalised ads based on your activity on and off of the Platform;
 - c. to collect information from your device, should you allow us to do so, such as location, access to your camera or photos in order to provide you with additional services of the Platform;
 - d. data sharing for marketing purposes with third parties and business partners in the following product categories: producers and/or wholesale, retail and online distributors of technological, design, fashion, luxury products.

Please be aware that you can revoke your consent at any time as provided under the following section “*Your Rights*” as well exercise any of the other rights herein provided.

D. Compliance with legal obligation. We may use your personal data to comply with legal obligations to which we may be subject.

SHARING YOUR DATA

Your information will be shared in the following ways:

- Sharing information on the Platform: when you comment, share information or upload contents, video or photos, your data will be shared with the audience you choose. Please be aware that (i) public information can be accessed also by third-party services such as APIs, apps, search engines, content aggregators, websites and other services integrated with the Platform, (ii) information shared with other users can be downloaded or reshared by such users to others also off the Platform.
- The personal data will be processed by our employees or collaborators assigned to the corporate functions deputed to the pursuit of the above-mentioned purposes, in their capacity as authorized processors ex art. 29 GDPR or designated pursuant to art. 2-quaterdecies of Legislative Decree 196/2003.
- Service providers: in order to provide, support and develop the services related to the Platform, including to manage and improve it and its features, we work with third-party partners and service providers, including cloud hosting, customer and technical support, content moderation, marketing and analytics partners. All of these subjects have been designated as data controllers according to art. 28 GDPR.
- Third-party integrations: when you consent to connect third-party integrations, platform or services to the Platform, your personal data can be shared with such third-party integrations. Please be aware that personal data collected by third-party integrations, platform or services are not subject to this Privacy Policy, but their own privacy terms and conditions.
- Corporate transactions: Your information may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control, or acquisition of all or a portion of our business.
- Legal obligations: your personal data may be shared with public and/or private individuals, natural and/or legal entities (legal, administrative, and tax consultancy firms, Chambers of Commerce, etc.), if we have good faith belief that providing this information is necessary or functional: for correctly complying with the contractual obligations taken on, as well as with any obligations provided under applicable laws and regulations, legal process or government requests; to investigate potential violation of and enforce Platform’s policies and terms of use; to investigate, prevent and/or address illegal activities; to protect the rights, property, and safety of our users.

We do not take information about you from public entities. We may share anonymous information with third parties to provide additional information for analysis and statistics on the use of the Platform for research purposes.

TRANSFER OF DATA

We may share your personal data with recipients located in countries outside the European Economic Area (“EEA”) and/or the United Kingdom in accordance with this Privacy Policy and for the purposes as described herein.

Any such transfer of your personal data will be carried out in compliance with applicable laws.

We will carry out all these international transfers in accordance with the mechanisms set out in Articles 44-50 of the Regulation 679/2016/EU (the “GDPR”), always subject to appropriate or suitable safeguards as required by the GDPR or other relevant applicable laws.

DATA PROCESSING AND RETENTION

The processing will be carried out using automated and manual means, with methods and tools meant to guarantee the utmost security and privacy, by parties made responsible for this in compliance with the provisions of the relevant applicable laws. We regularly review our security measures to consider available new technology and methods.

Your data will be stored for the time strictly necessary for us to carry out the purposes they were collected for or until your account is deleted. Please be aware that we may retain information so long as it will be necessary to comply with contractual and legal obligations, when we have a legitimate business interest to do so (such as improving and developing the Platform, and enhancing the safety, security and stability of the Platform), and for the exercise or defence of legal claims.

YOUR RIGHTS

In accordance with the provisions of GDPR and other applicable legislation of data protection, you have the following rights:

- To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To rectify: where you consider that your personal data are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To erase: you can require the deletion of your personal data, to the extent permitted by Article 17 of GDPR or other applicable legislation of data protection.
- To restrict: you can request the restriction of the processing of your personal data, to the extent permitted by Article 18 of GDPR or other applicable legislation of data protection.
- To object: you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- To data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

You may exercise your rights by contacting us at the following e-mail address: privacy@maawi.com. Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details or provide additional information so that we can understand the issue.

SOCIAL PLUG-INS AND RELATIONS WITH SOCIAL NETWORKS

Our Platform allow for interaction with social networks by means of sharing buttons and also may contain social network plug-ins.

If you access to one of this type of plug-in, the Platform connects directly to the servers of the social network and the plug-in is displayed on the screen thanks to the connection with the browser. If you use a social network to visit the Platform while connected to a social account, your personal information may be associated with the social account. The information will also be associated with the social account if the plug-in functions are used. Such information may include your email address, user ID and public profile.

As regards the methods of privacy protection and the processing of the personal information collected by those social networks to allow for the above-mentioned interaction, please refer to the pages of the individual social networks. If you do not want to associate the visit or the use of the Platform with a social account, please log off from the social network before visiting them.

Please take note that if a service for interaction with social networks is installed, it is possible that, even if you are not using the service, they may collect traffic data relating to the pages on which it is installed.

YOUNGER USERS

The Platform can be used by users you are at least 16 years old. Creating an account with false information relating to your age or on behalf of someone under the minimum age is a violation of our terms.

If you believe that we have information about someone younger than this, please contact us via the details set out in the “*Contact Us*” section below.

THIRD-PARTY WEBSITES

This Privacy Policy should not be considered valid for any other third-party websites that may be consulted via the links present on our Platform.

AMENDMENTS TO THE PRIVACY POLICY

This Privacy Policy may be subject to changes and additions over time, which may also be necessary according to new regulatory measures regarding the protection of personal data. Therefore, we invite you to periodically check the contents of this Privacy Policy. The “Last Updated” date at the top of this policy reflects the effective date of such policy changes. In addition, where possible, we will notify you before we make any amendments to this Privacy Policy in order to give you the opportunity to review the new terms before they will become effective.

CONTACT US

If you have any questions about this Privacy Policy, you can contact us via email by writing to the following email address: privacy@maawi.com or by writing to following postal address:

Maawi S.r.l.

Vicolo Santa Maria alla Porta no. 1,

20123 Milano, Italia

You can contact the Data Protection Officer for Maawi via email by writing to the following email address: lorusso@legalelorusso.it