

## PRIVACY POLICY

Dear User,

This data protection policy is intended to explain how Vera Financial dac (hereinafter the "Company" or the "Data Controller") processes<sup>1</sup> any of your personal data voluntarily sent to the contact addresses of the Company or collected through the website, as well as defining your rights and how to assert them.

If you are already one of our customers, please also refer to the "Customer information on the use of your data and your rights" which is always available in the "Customer Services" section of the website.

Your data will be processed in accordance with the applicable legal provisions and in compliance with the legal obligations regarding security and confidentiality.

### 1. REFERENCE LEGISLATION

Your personal data is processed according to Regulation (EU) 2016/679 (hereinafter the "GDPR")<sup>2</sup> and in certain circumstances by the 1988 Data Protection Act as amended by the 2003 Data Protection (Amendment) Act, (hereinafter the "Data Protection Acts") and by any other applicable legislation *ratione temporis*.

### 2. DATA CONTROLLER

The data controller of your personal data is the Company, headquartered at Beaux Lane House, Mercer Street Lower, Dublin D02 DH60, Ireland; fax: +353 1 6319 599; email: [info@verafinancial.com](mailto:info@verafinancial.com).

For better protection of your personal data, the Company has appointed a data protection officer (hereinafter the "DPO"). The DPO is responsible for monitoring the application of

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<sup>1</sup>By processing of personal data we mean any operation or set of operations carried out with or without the aid of automated processes and applied to personal data or sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, erasure or destruction.

<sup>2</sup> In particular, personal data will be processed by the Company manually or by electronic means suitable for the storage, custody and transmission of the same and in full compliance with the GDPR and the Data Protection Acts.

#### Vera Financial dac

Beaux Lane House, Mercer Street Lower, Dublin D02 DH60, tel.: +353 1 6319555 – fax: +353 1 6319599 – [info@verafinancial.com](mailto:info@verafinancial.com)  
Directors: D. Curran, T. Mottaran (Italian), M. Calzolari (Italian), D. Fagan, H. Griffey, D. Guest, M. Passafiume (Italian), R. Raichi (Italian)  
Registered in Ireland as a designated activity Company – Registered no. 295034

Vera Financial dac is regulated by the Central Bank of Ireland - Vera Financial dac is part of the Cattolica Assicurazioni Group registered in the Insurance Group Register c/o the Italian Regulator with no. 019

and compliance with domestic and EU legal provisions on the protection of personal data and is available at: [dpo@verafinancial.com](mailto:dpo@verafinancial.com).

### **3. PERSONAL DATA SUBJECT TO PROCESSING**

When you send requests, e-mails or any kind of communication to our contact addresses, we acquire whatever of your contact data we need to respond, as well as any of the personal data included in those communications.

In particular, through our website, we may collect the following types of personal information:

- Your title, first names, surnames, telephone numbers, addresses, email addresses, details of your request
- Recordings of the User's communications by email or the request function in the "Contact Us" section.
- Personal data contained in communications you have sent.

For information on how we use cookies, please refer to this page: [Cookies](#)

### **4. THE PURPOSE, LEGAL BASIS AND MANDATORY/OPTIONAL NATURE OF THE PROCESSING**

1. There is no obligation on your side to provide the data. Failure to send the requested data will only result in the inability to fulfil the request.

The processing of personal data referred to above is solely to allow us to respond to questions, concerns, requests for clarification, or to accept the suggestions of users.

The Company reserves the right to verify your identity by requesting the sending of an identity document or in any other form suitable for the purpose (for example through the confirmation of personal data in the possession of the Data Controller).

2. Any illegal or incorrect use of the Company's website and contact addresses may result in the transmission of the relevant personal data to a competent authority.

Such action is legitimate under Article 6(1)(f) of the GDPR<sup>3</sup>.

3. For reasons related to your particular situation, you have the right to object to the processing of data (see Paragraph 8.3). Your personal data is processed without the need for your consent, except when the provisions relating to your right to object are applicable.

## **5. SHARING OF YOUR PERSONAL DATA**

Due to the complexity of our organisation and the close interrelationships between the Company's different departments, any of our employees and/or collaborators may become aware of your personal data for the performance of their respective duties. These subjects are in charge of the processing of personal data and operate in accordance with instructions received.

If necessary, (see Paragraph 4.2, your data may be disclosed to competent authorities (e.g. Italian or Irish security agencies, official regulators, etc.).

## **6. RETENTION TIME OF PERSONAL DATA**

The personal data processed are kept for a period of time strictly necessary to carry out the above activities/purposes.

For further information, please do not hesitate to contact the Company at the addresses indicated in the section "Data Controller" of this Privacy Policy. This is without prejudice in any case to the possibility that the Company may retain your personal data for the period of time provided for and allowed by Italian law for protection of rights (Article 2947, Paragraphs 1 and 3, of the Civil Code).

## **7. YOUR RIGHTS AND HOW TO EXERCISE THEM**

The rights listed below may be exercised at any time in writing to one of the addresses indicated in the "Data Controller" section of this Privacy Policy.

The Company reserves the right to verify your identity by requesting the sending of an identity document or other forms suitable for the purpose (e.g. confirmation by personnel of the data controller).

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<sup>3</sup> The processing is necessary in the legitimate interests of the data controller or of third parties.

The Company also reserves the right to ask for clarification of requests received, in order to ensure rapid and targeted assistance.

### **7.1 Right of access (Article 15 of the GDPR)**

You can ask us directly if we have any information about you or about the processing of your data. If you wish, you may also ask the Company for a copy of the personal data we have processed.

### **7.2 Right to rectification or deletion of data, restriction of processing (Articles 16, 17 & 18 of the GDPR)**

You may at any time change (Article 16) any personal data concerning you that is inaccurate. You may also request the deletion (Article 17) of your personal data or the limitation (Article 18) of their processing to the reasons listed exhaustively in law<sup>4</sup>.

### **7.3 Right to object (Article 21 of the GDPR)**

If you have reasons related to your particular situation, you have the right to oppose the processing of data processed by the Company in pursuit of its legitimate interest.<sup>5</sup>

### **7.4 Right to data portability (Article 20 of the GDPR)**

If the legal requirements are met, you have the right to receive from the Company your personal data in a structured format, in common use and readable by an automatic device.

### **7.5 Right to withdrawal of consent**

You can always withdraw your consent without any consequences in relation to any optional data you provide (e.g. email address).

## **8. CLAIMS**

You always have the right to lodge a complaint with a data protection authority, notably in the Member State where you habitually reside, work or where the alleged breach occurred.

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<sup>4</sup> For a complete list of the cases in question, please refer to the relevant articles (the text of the GDPR is available at the following link: <https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=EN>).

<sup>5</sup> In the event of opposition to the processing of personal data, the Data Controller shall refrain from further processing the personal data unless they can demonstrate the existence of compelling legitimate reasons for processing that prevail over the interests, rights and freedoms of the data subject or for ascertaining, exercising or defending a right in court.

You also have the right to an effective judicial remedy if you consider that your rights under this Regulation have been infringed as a result of processing by us.

## **9. CHANGES**

The Data Controller reserves the right to update the contents of this Privacy Policy on their own initiative or in the event of changes in the applicable legislation. You can always find the latest version of the document in this section of the website.