

Dear User,

This data protection policy (hereinafter also "Document" or "Policy") is intended to explain how Vera Financial dac (hereinafter "Vera Financial" or the "Company" or the "Data Controller") processes 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") and by the Data Protection Act 2018, (hereinafter the "Data Protection Act") and by any other applicable legislation.

## **2. Data Controller**

The data controller of your personal data is Vera Financial, headquartered at Beaux Lane House, Mercer Street Lower, Dublin D02 DH60, Ireland; email: [info@verafinancial.com](mailto:info@verafinancial.com)

The Data Protection Officer (hereinafter the "DPO") is always 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 store personal data you provide such as contact details as well as any of the personal data included in the communications.

Through our website, we may collect the following types of personal information:

- Identity data: first names, surnames
- Contact information: email addresses
- 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
- Technical data provided by your device: IP address, time and date of your visit, the pages that were requested, the referring website (if provided), your internet browser type and version, operating system and platform and other technology on the devices you use to access this website.

## **4. The purpose and legal basis**

Where you send us a request via our website we process your personal data for the following purposes and legal basis:

- To handle your queries, based on consent
- To process a complaint or a data request, for compliance with a legal obligation.

Vera Financials employees' will access to your data on a "need to know" bases.

## 5. Sharing of your data

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

## 6. Retention of personal data

The personal data processed are kept for a period of time strictly necessary to carry out the above activities/purposes. This means that the period of time for which we store your personal data may depend on the type of data we hold. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For further information, please do not hesitate to contact the Company at the addresses indicated in the section "Data Controller" of this Document. 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.

## 7. Your rights and how to exercise them

The rights listed below may be exercised at any time by submitting a request in writing to the attention of the data protection officer at the contact details listed in Section 2 of this 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).

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 (art. 15 GDPR)

You have the right to obtain from us information on the personal data we hold on you including the following:

- Purposes of the processing
- Type of personal data held
- Categories of recipients of the personal data
- Information on how long the data will be stored
- If automated individual decision making, including profiling, takes place, as well as information on the logic involved and consequences of this
- If data is not collected directly from you, information on the source of the data
- The existence of the right to request from us rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing
- The right to lodge a complaint with the Data Protection Commission.

If you wish, you may also ask the Company for a copy of the personal data we have processed.

There is usually no charge applied to access your personal data (or to exercise any of the other rights). However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances

### 7.2 Right to rectification (art. 16 GDPR)

You have the right to have the Company correct any inaccurate personal data we have collected about you. You also have the right to have incomplete personal data completed; you may provide us with supplementary information to do this.

### **7.3 Right to erasure (art. 17)**

In certain instances, you have the right to have the Company erase the personal data we have collected about you. This right will not apply where we are required to process personal data in order to comply with a legal obligation or where the processing of this information is carried out for reasons of public interest in the area of public health. You have the right to have your data erased where one of the following applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing
- the personal data have been unlawfully processed
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject
- the personal data have been collected in relation to the offer of information society services.

### **7.4 Right to restrict processing (art. 18 GDPR)**

You have the right to have the Company restrict the processing of your personal data where one of the following applies:

- You contest the accuracy of the personal data (we will restrict the processing of the personal data until we verify the accuracy of the personal data)
- The processing is unlawful and you oppose the erasure of your personal data
- The Company no longer requires the personal data for the purposes of the processing but the data is required by you for the establishment, exercise or defence of legal claims
- You object to the processing of the personal data as outlined in Section 7.3 above (we will restrict the processing of the personal data while we verify our legitimate grounds for the processing which may override your interests, rights and freedoms).

Where you have restricted the processing of your personal data, we will continue to store your personal data but will only process it with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of other people or for reasons of important public interest or other non-restricted purposes.

### **7.5 Right to data portability (art. 20 GDPR)**

You have the right to receive personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format.

This applies to automated data only to the extent provided by you to us. This right to portability is limited to the following situations.

- Where the processing is based on the legal basis of consent

- Where the processing is based on the legal basis of entering into or performance of a contract.

#### **7.6 Right to object (art. 21 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.

Should this occur, we will no longer process your personal data for these purposes unless doing so is justified by a compelling legitimate ground.

#### **7.7 Right to withdraw consent**

Where we are processing your personal data on the legal basis of consent, you are entitled to withdraw your consent at any time. This does not affect the legality of the processing which took place when we had your consent.

#### **8. Right to Complain**

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights, you have the right to complain to the data protection authority in the Member State where you habitually reside, work or where the alleged breach occurred.

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**

Vera Financial reserves the right to update the contents of this 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.