

PRIVACY AND COOKIE POLICY

This Privacy and Cookie Policy ("Policy") applies to the processing of your personal data by Bending Spoons S.p.A. ("Bending Spoons", "we" or "us") through the "firstascent.io", "italy.firstascent.io", "international.firstascent.io", and "business.firstascent.io" websites in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation ("GDPR"), the Italian Legislative Decree 196/2003 (as amended), Directive 2002/58/EC – ePrivacy Directive, and other applicable local laws ("Data Protection Laws").

This Policy applies to the processing of:

- ID and technical information on your device, your web browser details, and your IP address through the use of cookies and similar technologies.
- Other personal data through our website, for example, when you send us an email requesting information about us or when you contact our customer support.

This Policy does not apply to other kind of data processing through this website. For example, when you send us your application for First Ascent, we will provide a specific privacy notice.

1. Data Controller and Data Protection Officer

The Data Controller is Bending Spoons S.p.A., based in Corso Como 15, Milan, MI 20154 (Italy), VAT 08931860962. For any requests regarding the processing of your personal data, please email us at privacy@bendingspoons.com.

Our Data Protection Officer can be contacted for any requests relating to the processing of your personal data or this Privacy Policy by sending an email to dpo@bendingspoons.com.

2. Purposes and Legal Bases

We process your personal data for the following purposes:

Purpose	Legal basis
a. To enable you to use our website and to provide you with information about First Ascent, and to process any requests you send to us when you contact us.	Processing is necessary to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR).
b. To comply with our legal obligations and any other obligations arising out of the instructions received from the authorities.	Compliance with a legal obligation to which the data controller is subject (art. 6(1)(c) of the GDPR).

To know how we process your data through the use of cookies, see [Section 7 \(Cookies\)](#) below.

3. Data Retention

We retain data collected through the use of our website for as long as necessary to carry out the purposes indicated above and in accordance applicable laws. We retain copies of email correspondence for a period of one year, except where a legal obligation imposes a longer

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period of time. To know how long your data is stored through cookies, see [Section 7 \(Cookies\)](#) below.

4. Your Choices

Providing navigation data is necessary if you want to navigate and interact with our website. Same goes for the information you share with us when you contact us to request information or support. You can freely decide whether to accept cookies and other tracking technologies not strictly necessary for the functioning of the website as indicated below in [Section 7 \(Cookies\)](#) below.

5. With Whom We Share Your Data

We may share your data with our contractors, service providers, consultants and commercial partners as well as any competent judicial, administrative or regulatory authority.

Your data can also be collected by third parties when you accept third party cookies. Please see [Section 7 \(Cookies\)](#) below for more information.

6. Your Privacy Rights

To the extent these are applicable to the processing described in this Policy, you have the following rights, as specified in the GDPR:

- the right of access to your personal data collected and processed by us.
- the right to obtain the updating or rectification of your personal data.
- under certain conditions pursuant Data Protection Laws, the right to obtain the cancellation of your personal data ("right to be forgotten"), the right to restrict the processing of your personal data, and right to data portability.
- the right to object to the processing of your personal data under legitimate grounds.

To exercise your rights, you may contact us by sending an email to privacy@bendingspoons.com. We may take reasonable steps to verify your identity prior to responding to your request.

You also have the right to lodge a complaint with the Italian Data Protection Authority or the competent national data protection or judicial authority.

7. Cookies

What are cookies?

Cookies are small files that a website stores on your computer or mobile device when you visit it. Cookies are stored through your web browser, based on your settings and preferences. Technologies of this type, such as web beacons, clear GIFs, and all types of local storage introduced through HTML5, can be used to provide basic functionality and to collect information on your browsing experience.

There are various types of cookies, based on their characteristics and use. While some cookies and tracking technologies are strictly necessary to navigate a website (for example, cookies that remember your preferences and settings; or cookies that keep your account logged in), others need your consent to be installed (for instance, to enable you to receive information about other products and services, or to improve your navigation experience).

Technical cookies

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Technical cookies do not need your consent and include:

- Session cookies which are necessary for the proper operation of a website. They are called as such because their duration is strictly limited to the work session (and are deleted after users close their browser).
- Analytics cookies which are used directly by the website owner to collect aggregate data on the number of visitors and how they interact with the website to improve its services. These cookies are not deleted after users close their browser but are retained by the device until a pre-defined expiration date or until they are deleted.
- Functional cookies which help the website remember users' choices and settings such as language or privacy preferences.

We use a functional cookie that allows the website to remember your cookie preferences. We also use Google Analytics, which uses third party cookies as explained below.

Profiling cookies

Profiling cookies are aimed at tracking users' online behavior and creating user profiles (for example, considering users' choices or preferences) in order to send marketing communications in line with the preferences shown by users while navigating the web. Profiling cookies and the processing of the users' personal data that derives from them is optional, meaning that they require your consent. When installed by third parties without safeguards aimed at minimizing the processing of your data, analytics cookies are comparable with profiling cookies, meaning that you need to consent to these too.

We do not host our own profiling cookies within this website, but this website hosts third-party cookies (including profiling cookies), as explained below.

Third-party cookies

So-called third-party cookies are set by external providers. This is because a website may feature certain elements (images, maps, sounds, specific links to sites located in another domain, etc.) installing third-party cookies residing in a different server.

Our website uses profiling and analytics cookies managed by external organizations. The data collected by these third parties is governed by their own specific privacy policies, terms and conditions, or cookie policies to which we have no control over.

Since our website hosts third-party analytics and profiling cookies, you will be prompted to consent to such third-party cookies when landing on our website for the first time, via a specific cookie banner.

You can manage and delete these third-party cookies at any time by accessing the third-party websites listed in the table below.

Third-party provider	Cookie name	Cookie retention period	Purpose	Third-party privacy policy
Google	_ga, _gat, _gat_gtag_UA_VALUE, _gid	From session up to two years	Analytics	policies.google.com/privacy You can find here specific information on Google Analytics privacy policy

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				including how to manage your settings
Facebook	_fbp, _fr	3 months	Marketing	www.facebook.com/policies/cookies/ If you have a Facebook account, you can manage your settings here

How to manage cookies

You are free to decide whether or not to accept any cookies also by adjusting your web browser controls. Disabling third-party cookies does not impair browsing in any way.

Each browser and device are different, so check the settings menu of the browser or device to learn how to change your settings and cookie preferences. If you choose not to receive cookies at any time, websites may not function properly, and certain services will not be provided. You can find information on how to manage cookie settings on certain browsers via the following links:

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Safari](#)

For more information about how to limit the use of third-party cookies installed in your browser, please visit www.youronlinechoices.com.

8. Changes

We may modify or update this Policy, also in view of future changes in the Applicable Data Protection Laws or in case we implement new features or functionalities that will process personal data.

Last updated: 7 August 2020