

PRIVACY POLICY

Dear User,

Doorway S.r.l., as Data Controller (hereinafter Data Controller) recognizes the importance of personal data protection and considers privacy and personal data protection one of the main objectives of its activity.

We therefore invite you, before communicating any personal data to the Owner, to read this Privacy Policy carefully, as it contains important information about your privacy, protection of personal data and the security measures taken to ensure its confidentiality in full compliance with applicable legislation.

This Privacy Policy also

- is intended for the website www.doorwayplatform.com of Doorway S.r.l. (from this moment on Portal) which is managed by the Owner; this Policy does not apply to websites that may be consulted through external links;
- is also to be understood as Information provided pursuant to art. 13 of European Regulation (EU) 2016/679 (hereinafter referred to as GDPR) in relation to the personal data that Doorway S.r.l. will come into possession of.

Summary

Owner and data processors.....	1
Personal data subject to processing.....	2
Information collected through cookies.....	3
Purpose of data processing.....	5
Legal basis of the treatment.....	5
Compulsory or optional nature of data provision.....	6
Methods of data processing, security and place of processing.....	6
Period of data processing and storage.....	6
Communication and dissemination of data.....	6
Your rights.....	7
Privacy policy changes.....	8

Owner and data processors

The data controller of the personal data collected through its crowdfunding portal which can be reached at the following address: www.doorwayplatform.com is the company Doorway S.r.l. with registered office in Bologna, Via Guerrazzi n. 1/A, 40125, tax code and VAT number 03574571208, REA BO - 531172.

For certain processing operations, Doorway S.r.l. makes use of employees or collaborators, who are appointed to carry out processing operations under the authority of the Data Controller, as well as partner companies or professional firms or firms providing assistance and advice on accounting, administrative, legal, tax and financial matters located in the territory of the European Union, who are duly instructed by the Data Controller pursuant to Article 29 of the GDPR.

The updated list of subjects carrying out processing operations under the authority of the Owner is kept at the Owner's head office and can be requested by sending an email to: privacy@doorwayplatform.com.

The Data Controller's delegate for the processing of data relating to this information notice is Dr. Antonella Grassigli, e-mail: privacy@doorwayplatform.com.

Personal data subject to processing

The computer systems and software procedures used to operate the Portal acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the devices used by users who connect to the site, URI (Uniform resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

This data is used in order to obtain anonymous statistical information on the use of the Portal and to check its correct functioning, to allow the correct provision of the various functions requested by the user, for security reasons and to ascertain responsibility in the event of hypothetical computer crimes committed by the Portal or third parties and is deleted immediately after processing.

In no case does Doorway cross-reference this information with other data in its possession in order to track the activities of specific users.

In order to access the functionalities offered through the Portal and reserved for registered users, the following personal data (hereinafter Data) are requested from you during registration and for the purposes of filling in your profile:

- *personal data*: name and surname, place and date of birth, tax code, sex and address of residence and domicile;
- *identity data*: photos or images of the interested party and identification documents (identity card, passport, driving licence);

- *contact details*: telephone number and e-mail address, place of work, employer identification;
- *bank data*: account number, IBAN and BIC code, in case of foreign account;
- *financial data*: the status of qualified investor, if any, data on knowledge and experience in the field of investments in financial instruments and equity crowdfunding portals, the frequency and amount of transactions, the origin of the funds;
- data on the level of education and current and past professional experience.

Through the Portal, the Owner does not acquire data of a sensitive nature or in any case belonging to the special categories referred to in art. 9 of the GDPR or data relating to criminal convictions or offences referred to in art. 10 of the same GDPR.

Information collected through cookies

Cookies are small text files that sites visited by you send and record on your computer or mobile device and then retransmit them to the same sites the next time you visit. It is precisely thanks to cookies that a site remembers the user's actions and preferences (such as, for example, login details, the language chosen, font size, other display settings, etc.) so that they do not have to be indicated again when the user returns to that site or navigates from one page of it to another. Cookies, therefore, are used to perform computer authentication, session tracking and storage of information regarding the activities of users accessing a site and may also contain a unique identification code that allows the user's navigation within the site to be tracked for statistical or advertising purposes. During navigation on a site, the user may also receive cookies from sites or web servers other than the one he is visiting on his computer or mobile device (so-called "third party" cookies). Some operations could not be carried out without the use of cookies, which in certain cases are therefore technically necessary for the site to function itself.

There are various types of cookies, depending on their characteristics and functions, and these can remain on the user's computer or mobile device for different periods of time: so-called session cookies, which are automatically deleted when the browser is closed; so-called persistent cookies, which remain on the user's device until a predetermined deadline.

According to the regulations in force in Italy, the use of cookies does not always require the express consent of the user. In particular, "technical cookies", i.e. those used for the sole purpose of transmitting a communication over an electronic communication network, or to the extent strictly necessary to provide a service explicitly requested by the user, do not require such consent. These are, in other words, cookies that are essential for the functioning of the site or necessary to perform activities requested by the user.

Among the technical cookies, which do not require express consent for their use, the Italian Personal Data Protection Authority (see "Provvedimento *Individuazione delle modalità semplificate per l'informativa e l'acquisizione del consenso per l'uso dei cookies* dell'8 maggio 2014, hereinafter only "**Provvedimento**") also includes:

- cookie analytics" where used directly by the site operator to collect information, in aggregate form, on the number of users and how they visit the site,
- navigation or session cookies (to authenticate),
- functionality cookies, which allow the user to navigate according to a number of selected criteria (e.g. language, products selected for purchase) in order to improve the service provided to the user.

For "profiling cookies", on the other hand, i.e. those aimed at creating profiles relating to the user and used to send advertising messages in line with the preferences expressed by the user when surfing the web, the user's prior consent is required.

The Portal uses the following types of cookies, and offers the possibility of de-selecting them, except for third-party cookies for which the user must directly refer to the relative selection and de-selection of the respective cookies, indicated by means of links:

- Technical cookies - browsing or session cookies - strictly necessary for the operation of the Site or to allow the user to take advantage of the contents and services requested by them.
- Cookies analytics, which allow the operator of the Site to understand how it is used by users. These cookies do not collect any information about your identity or any personal data. The information is processed in aggregate and anonymous form.
- Functionality cookies, used to activate specific features of the Site and a series of selected criteria (e.g. language, products selected for purchase) in order to improve the service provided.

WARNING: disabling technical and/or functionality cookies may make the Site unavailable or certain services or functions of the Site may not function properly, and you may be forced to modify or manually enter certain information or preferences each time you visit the Site.

- Third party cookies, i.e. cookies from sites or web servers other than the Owner's, used for purposes specific to such third parties, including profiling cookies. Please note that these third parties, listed below with the relevant hyperlinks to privacy policies, act as autonomous data controllers of the data collected through cookies sent by them; therefore, the user must refer to their policies for the processing of personal data, information and any consent forms (selection and de-selection of the respective cookies).

In detail, cookies sent directly by Doorway S.r.l. through the Site are indicated at the following link:

<https://www.doorwayplatform.com/cookies-and-privacy>

Purpose of data processing

The Data provided through the Portal are processed by the Owner for the following purposes.

Utilities and Portal management. The Data you provide is processed to manage your account, enable hosting and fundraising administration, manage the Portal, the services offered through it, including user support service and user relations, host and manage communications and comments, host and manage the community forum, perform business performance statistics, analyse and track the Portal's audience and facilitate navigation, as well as those of our social network pages (Facebook, Instagram, LinkedIn, Twitter and YouTube).

Provision of the services requested. The Data are processed to allow your registration to the Portal and the use of the services specifically related to it (request for contact, subscription to the newsletter, registration, presentation of offers by Investors and Bidders, resolution of problems related to the use of the Portal, complaints, etc.).

Adequacy verification purposes. Your Data is processed for the fulfilment of legal obligations in order to verify your level of experience and knowledge in the field of investments in financial instruments.

Management of disputes. The Data are processed to manage any legal disputes, both in and out of court, that may arise between the Owner and the user.

Marketing and newsletters. Subject to explicit and specific consent, the Data Controller may process your Data for the purpose of sending advertising material or commercial communications relating to possible promotions or investment campaigns or to process market research, promote its services and products and offer new services or products, conduct training courses and events relating to the services and products offered. Such communications will be sent through the use of automated systems (sms, mms, e-mail, push notifications). For this purpose, the consent given can be revoked at any time, even with reference only to automated contact systems, by writing to privacy@doorwayplatform.com.

Legal basis of the treatment

The legal basis for the processing of the Data is to be identified:

- in the execution of the contract with the Owner;
- in a legal obligation of the Owner to manage the relationship with the Interested Party;
- in the express consent of the Interested Party, in particular where there is no legal or legal obligation or legitimate interest of the Owner.

Compulsory or optional nature of data provision

The provision of your data is not obligatory, however, failure to provide them or incorrect communication prevents the completion of the contractual relationship and the provision of the services requested.

Moreover, failure to confer them would not allow the Owner to meet the obligations provided for by law, Community legislation or regulations.

Methods of data processing, security and place of processing

Your Data are processed by the Data Controller - or by third parties selected with care for their reliability and competence - only for the purposes specified above, either by means of paper instruments, intended for a file, or by means of computer tools suitable for processing them, based on qualitative, quantitative and temporal criteria.

Period of data processing and storage

The Data are kept for the period of time strictly necessary to achieve the purposes for which they are collected and, if different, for the period required by civil, fiscal and tax regulations and, subsequently, unless the right to cancellation of the Data Subject is exercised, for an indefinite period.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorised access in full compliance with the provisions of the GDPR.

Communication and dissemination of data

The Data may be communicated to

- persons, companies or professional firms that provide assistance and advice to the Owner for the provision of the services offered by the Portal;
- banking and insurance institutions involved in the characteristic activity of the Portal;
- persons, authorities to whom disclosure of the Data is required by law or orders of the competent authorities;
- judicial or administrative authorities, for the fulfilment of legal obligations.

Such communications shall in any case be made with a guarantee of protection of the rights of the interested party and with a ban on further communication or dissemination without explicit authorisation in this regard.

No transfer of data outside the EU or to international organisations is foreseen.

Your rights

As an interested party within the meaning of the GDPR you have the right to:

- obtain confirmation of the existence or non-existence of personal data concerning you, even if not yet recorded, and their communication in an intelligible form;
- obtain an indication of the origin of your personal data, the purposes and methods of processing;
- to obtain an indication of the logic applied for the processing carried out with the aid of electronic instruments;
- obtain the identification details of the Owner, the managers and the designated representative;
- obtain information on the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, managers or agents.

As an interested party you are also entitled to:

- ask the Data Controller for access to your personal data and information relating to them, the rectification of inaccurate data or the integration of incomplete data, the deletion of personal data concerning you (on the occurrence of one of the conditions indicated in Art. 17, paragraph 1 of the GDPR and in compliance with the exceptions provided for in paragraph 3 of the same article); request the limitation of the processing of your personal data (on the occurrence of one of the hypotheses indicated in Art. 18, paragraph 1 of the GDPR);
- request and obtain from the Data Controller - in cases where the legal basis of the processing is the contract or consent, and the same is carried out by automated means - your personal data in a structured and machine-readable format, also for the purpose of communicating such data to another data controller (so-called right to portability of personal data);
- oppose at any time the processing of your personal data to the occurrence of particular situations that concern you, provided that they are not necessary for the fulfilment of a legal obligation of the Data Controller;
- withdraw your consent at any time, limited to cases where the processing is based on your consent for one or more specific purposes and concerns common personal data (e.g. date and place of birth or place of residence), or particular categories of data (e.g. data revealing your racial origin, political opinions, religious beliefs, state of health or sex life). Treatment based on consent and carried out prior to the revocation of the same retains, however, its lawfulness;
- lodge a complaint with a supervisory authority (Data Protection Authority - www.garanteprivacy.it).

To exercise your rights, you may contact the Data Controller or the delegate indicated above by writing to privacy@doorwayplatform.com.

Privacy policy changes

Doorway S.r.l. reserves the right to modify or simply update the content of this Privacy Policy, in whole or in part. Doorway S.r.l. It will inform you of such changes as soon as they are introduced.