Privacy Policy (Version 1)

This privacy policy (herein after "the Policy") applies to the processing of personal data carried out in the process of recommending nearby restaurants to end users of CloverIT.

Further to Article 11 and Article 12 of this Regulation, the Institution CloverIT provides the data subjects with the following information:

- Data Controller: *CloverIT*
  Data Protection Officer (herein after "the DPO"): *Mr. Andrea Bouquet*
  Email: *info@clover-it.com*

- The purpose of the processing is to provide end users with <u>recommendations of nearby restaurants to visit</u>. As part of our business model, we additionally process personal data to <u>present advertisement</u> to our customers and <u>perform marketing</u>. To prevent fraud, we process personal data for <u>identity verification</u>.

- The categories of data collected and used for the processing operations are:
  - <u>location data</u> (GPS location, collected via mobile app)
  - <u>name data</u> (name and first name, collected through account creation)
  - <u>fingerprint data</u> (fingerprint, collected via fingerprint sensor)

- The recipients of the data are:
  - <u>CloverIT Marketing Research Unit</u>
  - <u>CloverIT Data Science Unit</u>
  - <u>AdNet-X-Italy</u>

The applicants have the right of access and the right to rectify the data concerning him or her by contacting the person designated as being in charge of the processing operation. The right of rectification can only apply to factual data processed within the selection procedure. In addition, data related to the admissibility criteria can not be rectified after the closing date of submitting applications.

- The legal basis of the processing operation at stake is necessity to perform a contract and consent.

- The time limits for storing the data are the following:
  - location-data for in-situ recommendations
  - name data for the recruited candidates
  - fingerprint for the spontaneous applications

- The candidates have the right to have recourse at any time to the DPO info@clover-it.com and to the European Data Protection Supervisor (EDPS) edps@edps.europa.eu.