

PRIVACY POLICY

pursuant to European Regulation no. 679/2016 ("GDPR")

Virium INVESTIMENTI SA looks at the protection of personal data of its users (hereinafter, the "Users") of fundamental importance, and ensures that the processing of personal data carried out through the website www.virium.ch (hereinafter, the "Site") takes place respecting the rights of the interested party, with particular reference to confidentiality, protection of personal identity and the right to protection of personal data (hereinafter, the "Data"), in compliance with the provisions of European Regulation no. 679/2016 (hereinafter the "GDPR") and of the other national and Community reference provisions.

Types of data processed and methods of treatment

Virium INVESTIMENTI SA collects some personal data of Users, such as name, surname, e-mail address, telephone number, user ID and password, aggregated information while browsing the Site, other personal data voluntarily provided by the User during the registration phase, or on the occasion of the request for goods or services offered by the Site or the request for information sent to the Site by e-mail.

The Website is accessible to Users without the need to provide personal data. However, some parts of the Website are accessible only to Registered Users. The personal data of Users, therefore, may be processed, by automated means, during navigation, at the time of registration on the Site, at the time of requesting information or requesting the supply of goods. Furthermore, in the event that a User gets in touch to request information, Virium INVESTIMENTI SA will collect his personal data in order to provide an answer.

Navigation data

The computer systems, and the software procedures used to operate the Site, during their normal operation acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but which by their 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 computers used by the Users who connect to the site, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, 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 (success, error, etc.) and other parameters related to the operating system and to the users' computer environment.

Data provided voluntarily by the User

Virium INVESTIMENTI SA also collects the personal data of the Users included in the request form for information, price quotations, goods or services, as well as the personal data forwarded to Virium INVESTIMENTI SA by e-mail.

Personal data automatically placed on the Users' computer (Cookie)

Cookies are small files, generally short strings of text and numbers, containing information entered on the Users browser when a website is visited. While browsing, Users may also receive cookies from different sites on their terminal (so-called "third-party" cookies), set directly by the operators of said websites and used for the purposes and according to the procedures defined by them. For more information about the type and use of cookies on this site, please refer to the cookie policy.

Purposes of personal data processing

Virium INVESTIMENTI SA will process the Users' personal data for the following purposes: 1) requirements relating to the authorization, qualification, and personalization of access to the various areas and related contents of the Site; 2) performing a service or an operation requested by the User in the context of the Company's activity; 3) sending newsletters and periodic updates (eg. by e-mail) relating to products, services, 4) initiatives and events organized by or in collaboration with Virium INVESTIMENTI SA including invitations to the aforementioned events, both with traditional means of communication (eg. paper mail, telephone calls from the operator, etc.), and with automated electronic methods according to art. 130, paragraphs 1 and 2 of Legislative Decree 196/03 and, where appropriate, to the community and / or national provisions that will replace / integrate the aforementioned legislation. 5) direct marketing activities, aimed at promoting the services, products and brands of Virium INVESTIMENTI SA both with traditional means of communication (eg. paper mail, telephone calls by the operator, etc.), and with automated electronic methods as per 'art. 130, paragraphs 1 and 2 of Legislative Decree 196/03 and, where appropriate, of the community and / or national provisions that will replace / integrate the aforementioned legislation; 6) analysis activities and

market surveys, both with traditional methods of communication (eg. paper mail, telephone calls from the operator, etc.), and with automated electronic methods as per art. 130, paragraphs 1 and 2 of Legislative Decree 196/03 and, where appropriate, of the community and / or national provisions that will replace / integrate the aforementioned legislation;

What are the legal bases of treatment

The Holder processes Personal Data relating to the User in the event one of the following conditions exists:

1. the User has given consent for one or more specific purposes; Note: in some jurisdictions the Data Holder may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object to such processing. However, this is not applicable if the processing of Personal Data is regulated by European legislation regarding the protection of Personal Data;
2. processing is necessary for the execution of a contract with the User and/or the execution of pre- contractual measures;
3. processing is necessary to fulfill a legal obligation to which the Data Holder is subject;
4. processing is necessary for the performance of a task carried out in the public interest or for the exercise of public authority vested in the Holder;
5. processing is necessary for the pursuit of the legitimate interest of the Holder or third parties.

In any case, it is always possible to ask the Holder to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, or provided for by a contract, or necessary to conclude a contract.

Method of treatment

Data processing will be based on the principles of lawfulness, correctness, transparency, proportionality and minimization and can also be carried out through automated procedures designed to store, manage and transmit them and will be

carried out using appropriate tools, as for reason and the state of the art, to guarantee security and confidentiality through the use of appropriate procedures that avoid the risk of loss, unauthorized access, illicit use and dissemination.

Data retention period

The Data are processed and stored for the time required for the purposes for which they were collected. Therefore: Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of the contract is completed.

Personal Data collected for purposes related to the legitimate interest of the Data Holder will be retained until such interest is met. The User can obtain further information regarding the legitimate interest pursued by the Data Holder by contacting the Data Holder. When the treatment is based on the consent of the User, the Data Holder may retain the Personal Data for a longer period, until such consent is revoked. Furthermore, the Data Holder may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or an order of an authority. Necessary for the conduct of direct marketing activities will be considered valid until unsubscribed by the user, via a link in each email. If the sending frequency is lower, at least every twelve months a verification message will be sent to all users, containing the unsubscribe link.

At the end of the retention period, the Personal Data will be deleted. Therefore, at the end of this term, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

Who processes data

The subject that determines the purposes and methods of data processing, or the Data Holder is Virium INVESTIMENTI SA, con sede in Lugano (TI) – Svizzera, Piazza Dante 8, e-mail: info@virium.ch, Tel. +41 (0)91 9117010, Fax +41 (0)91 9117019 .All employees of Virium INVESTIMENTI SA who access, or will access, the data of the Users operate / will operate under the direct authority of the Data Holder, are/will be authorized persons to process personal data and have received/will receive, in this regard, adequate operating instructions.

Users may address any type of communication and request to the Data Holder or to the Data Protection Manager, at the above-mentioned mail, fax or certified mail addresses.

Who are the recipients of your Personal Information

The subject that determines the purposes and methods of data processing, or the Data Holder is Virium INVESTIMENTI SA, con sede in Lugano (TI) – Svizzera, Piazza Dante 8, e-mail: info@virium.ch, Tel. +41 (0)91 9117010, Fax +41 (0)91 9117019 . Your Personal Information may be disclosed to and processed by:

- (i) legal or physical persons acting as external processors, carrying out outsourced activities, appointed by Virium INVESTIMENTI SA or by the external processors of Virium INVESTIMENTI SA (including subjects entrusted with assistance, communication, marketing, advertising, promotions and sale of products and / or services as well as advertisers, advertising agencies, IT service providers, Site / APP managers, operators of electronic platforms, partners, lenders, professional firms);
- (ii) employees and/or collaborators of the Data Holder who, operating under the direct authority of the latter, will be authorized to process your Personal Data;
- (iii) employees and/or collaborators of external data holders (including system administrators) who, acting under the direct authority of external data holders, will be authorized to process your Personal Data. Your Personal Information will not be disclosed to third parties, except in the case where your Personal Data should be communicated by Virium INVESTIMENTI SA to consultants in order to protect its own rights, nor will they be disseminated.

Transfer of data abroad.

Data will not be transferred outside the European Union.

Users' rights with regard to their personal data

The Privacy Policy recognizes you, as an interested party, numerous rights. In particular, you have the right to: 1. obtain from the Holder confirmation of the existence/not existence of your Personal Data, even if not registered yet, and their communication in an intelligible form, as well as access to your Personal Data (obtaining a copy) and related information (including the purposes of the processing, the categories and the origin of your Personal Data, the categories of recipients to whom they have been or may be communicated, the retention period (when possible), the rights that can be exercised;

2. obtain from the Holder the correction of your Personal Data and the integration of

your incomplete Personal Data; 3. obtain from the Holder the deletion of your Personal Data without undue delay, among other things, when the Personal Data are no longer necessary in relation to the purposes for which they were processed or the legal basis for their processing is no longer present;

4. obtain from the Holder the anonymous transformation or blocking of your Personal Data processed in violation of the law, including those data that do not need to be stored, in relation to the purposes for which the Personal Data were collected or subsequently processed ; 5. obtain from the Holder the limitation of the processing of your Personal Data, inter alia, when you dispute the accuracy or are opposed to processing, for the period necessary for the respective checks; 6. receive, in a structured format, commonly used and readable by automatic device, your Personal Data and transmit or, if technically feasible, obtain direct transmission of your Personal Data to another data holder without impediments, in cases where the processing is done by automated means and is based on your consent or is necessary for the execution of a contract of which you are a part;

7. withdraw consent to the processing of your Personal Data for any purpose for which it was provided. You can exercise your rights towards Virium INVESTIMENTI SA by accessing the "Contact Us" section of the Website or by writing to the following email address info@virium.ch.it or by sending a letter by ordinary mail to: Virium INVESTIMENTI SA

Moreover, in the event that you believe that the processing of your Personal Data violates the Privacy Law, you can file a complaint with the Guarantor for the protection of personal data of the State where you live, where is your place of work or where the alleged violation has occurred, or contact the same Authority to request information regarding the exercise of your rights under the Privacy Law.

Third party sites

This Privacy Policy applies to the personal data of Users, collected through the Site; the same Privacy Policy does not apply to other websites owned by third parties, which may be accessed through a link on the Site. Virium INVESTIMENTI SA cannot be held responsible for the contents of these sites and the rules they adopt, even with regard to the privacy of Users and the processing of their personal data during browsing on such sites. Users are therefore requested to pay attention, when connecting to these sites via the links on our Website, and to read carefully their terms of use and privacy policies.

