



Privacy Policy

ESGenius! - The Sustainability OS

Last Revision: 29/09/2023

1. PREAMBLE

ESGenius! - The Sustainability OS considers the safeguards of Personal Data of Users of its Services of paramount importance. For this reason, ESGenius! - The Sustainability OS complies with the EU General Data Protection Regulation 2016/679 ("GDPR").

This Privacy Policy sets out how ESGenius! - The Sustainability OS will treat your Personal Data when using our Software.

2. DATA CONTROLLER

For the purpose of this Privacy Policy, ESGenius! - The Sustainability OS is the Data Controller of your Personal Data.

3. EMPLOYEES AND SERVICE PROVIDERS

We may disclose your Personal Data to some of our employees and our service providers insofar as reasonably necessary for the purposes set out in this Privacy Policy.

ESGenius! - The Sustainability OS has in place written agreements with each of its service providers that are compliant with GDPR. Nevertheless, the Software and the owner company ResNovae remain responsible for the processing of Personal Data within its Services. Except as provided in this Privacy Policy, we will not share your Personal Data to any third party.

4. COOKIES

To find out more about how we use cookies, please see our Cookies Policy.



5. PERSONAL DATA WE COLLECT

We collect personal data about you from a variety of sources, including information we collect from you **directly** (e.g. when you register and use the Software); from **third parties** (e.g. from your employer) or **automatically** (e.g. through cookies):

Personal data we may collect directly from you: Identification data (e.g. name, surname, email address, and telephone number); Login information (e.g. user name and password); Internet profiles (e.g. IP address, web browser, use of the Software and device information); Economic and financial data (e.g. users' selected portfolio and preferences); Employment data (e.g. employer and position); Behavioural information (data collected using cookies and other device identifying technologies); and other information provided at your discretion from time to time.

Personal data we may collect from third parties: we may obtain from your employer certain information, such as your professional contact details (e.g. name, surname, email address, and telephone number).

Personal data we may collect automatically from you: when using the Software we collect automatically from you certain information which may include personal data. Further information about our use of cookies and tracking technologies is available in our Cookie Policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. This Software may include links to third-party web platforms, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party web platforms and are not responsible for their privacy statements. When you leave our Software, we encourage you to read the privacy policy of every software you visit.

We also collect, use and share aggregated data such as statistical data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. **We do not collect any special categories of personal data about you** (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offence.

6. HOW WE USE YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS

We use and subsequently process personal data we collect about you on the following legal basis and for the purposes identified below:

- We will process your personal data for managing and controlling your registration and use of the Software on the basis of the **execution of the Legal Notice**.
- We will process your personal data on the basis of our legitimate interest, for the following purposes:
 1. To manage the contractual relationship entered into with your employer, by which you have access to the Software
 2. To manage the Software, including the protection of the security and/or integrity of the Software and our IT infrastructure
 3. To deal with your enquiries and requests
 4. To understand how you use our Services and to enable us to improve and further develop the features, performance and support available on the Software, which may entail the provision of anonymous statistical information about our visitors

We will process your personal data in order to comply with applicable laws, which may include the disclosure of your personal data and other complementary information to comply with requests received from authorities and/or bodies with compelling power.

You can ask us or third parties to stop sending you marketing messages at any time by following the **opt-out** links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your purchase or use of our services.

7. HOW WE SHARE YOUR DATA AND WITH WHOM

ESGenius! - The Sustainability OS will be able to share your personal data with technology service providers, exclusively for the purposes of ESGenius! functionalities. Our service providers that support the IT infrastructure of ESGenius! - The Sustainability OS and provide other services that may be required to have access to and process your data, on our behalf and to the extent necessary in order to provide the service.

Should some of the recipients of your personal data mentioned in this section are located outside the EU, in countries not regarded as ensuring an adequate level of protection for personal data under EU law, we will put in place appropriate safeguards in accordance with applicable legal requirements to ensure that when transferred to such recipients, your data is adequately protected. In particular, we will enter into agreements with the recipients on the basis of the relevant sets of standard contractual clauses approved by the European Commission available for consultation at the Software of the European Commission.

8. HOW LONG WE STORE YOUR PERSONAL DATA

We will keep your personal data for as long as we have a relationship with you and insofar the agreement with your employer is in force. Afterwards, we will retain your personal data for a period of 3 years, to enable us to defend ourselves against potential legal and contractual actions (during their expiration period). Finally, once these actions expire, we will proceed to delete your information.

9. YOUR RIGHTS ON YOUR PERSONAL DATA

You have certain rights regarding your personal data. These include the following rights:

1. To know how we are processing your personal data and to access to your personal data
2. To request the **rectification** of inaccurate or incomplete personal data
3. To request the **erasure** of your personal data when, among others, such data is no longer necessary for the initial purposes for which it was initially collected, in accordance with applicable law
4. To **restrict our processing** of your personal data, under certain circumstances
5. To **object** to our processing of your personal data, having regard to the given circumstances and for reasons related to your particular situation
6. To request the **portability** of your personal data, which will allow you to obtain and reuse the personal data in a usable electronic format for your own purposes and across different services without hindrance to usability, including its transmission to another third party
7. To **withdraw the consent** you may have granted to a specific processing, at any time
8. To **make a complaint** to the competent Data Protection Agency

10. CHANGES TO OUR PRIVACY NOTICE

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on the Software. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

www.esgenius.eu