Website Privacy Policy

► WHY THIS NOTICE?

Redo S.r.I. (hereinafter, the Company), P. IVA: 11601770966, with registered office in Corso Garibaldi, 49, Milano, acknowledges the central role of personal data in the socio-economic ecosystem in which it operates, as well as the critical issues related to their use in the provision of services that involve the non-incidental use of artificial intelligence systems. Accordingly, the Company is fully aware of the importance of clear and transparent communication in order to mitigate risks to the rights and freedoms of all natural persons whose personal data are processed.

Furthermore, privacy legislation (in particular Regulation (EU) 2016/679, the "General Data Protection Regulation" – GDPR) requires us to provide you with the following information regarding the processing of your personal data, pursuant to Articles 13 and 14. For these reasons, Redo S.r.l., Corso Garibaldi, 49 – 20121, Milano (MI), as the "Data Controller," hereby provides this privacy notice to describe the modalities for processing your personal data in connection with its website.

The Role of the Company

It is important to emphasize from the outset that the Company, in the course of its activities, operates both as a Data Controller and as a Data Processor. Since, pursuant to Articles 13 and 14 of the GDPR, the obligation to provide information on processing lies exclusively with the Data Controllers, this document will concern solely the processing activities for which the Company acts as Data Controller. These include activities related to service registration and the operation of the website, concerning the personal data of natural persons who access the site either as visitors or as operators with login credentials, for the purpose of accessing the services provided. However, in the interest of transparency and in the spirit of fair cooperation with the Data Controllers, the Company considers it useful to provide clients with information regarding processing activities carried out in its capacity as Data Processor. These include activities arising from the provision of its typical services (quality checks, enhancement, augmentation of training data, initial model training or re-training, processing and returning of inferences for the purposes chosen by the clients from those available, and retention of original database files for training). To this end, upon request by the client-Controllers, the Data Protection Impact Assessment (DPIA) prepared following the impact assessment pursuant to Article 35 GDPR is available. Extracts of the document may also be made available to third parties, upon request, in the interest of maximum transparency. It should be noted, however, that with regard to processing carried out as a Data Processor, the Company does not determine the specific purposes and categories of personal data used from time to time (which partly depend on the discretionary choices of the clients), the final retention periods of the data, the entities with whom the Controllers choose to share them, or numerous other relevant aspects of processing, except for those specifically related to the technical characteristics of the services provided. Furthermore, the Company cannot directly or autonomously respond to data subject requests, as it does not know the identity of the individuals involved, operating solely on information that is not attributable to specific natural persons (data pseudonymized at source and therefore anonymous from the Company's perspective, which does not possess, nor can it possess, legal or technical means to re-identify the data subjects). Nonetheless, the aforementioned DPIA contains information regarding technical "by design" measures adopted to facilitate the exercise of data subject rights by client-Controllers, in particular with respect to the explainability of Al model inferences and the human oversight of processes ("humanin-the-loop" supervision), in compliance with Article 22 GDPR as well as related regulations on Artificial Intelligence (Reg. (EU) 2025/1689 and sector-specific regulations, e.g., EBA).

Finally, it should be noted that operations carried out by the Company for the purpose of developing additional AI models for its own interest are normally performed using synthetic data or data subjected to processes (embedding) that render them fully anonymous and not attributable to identified or identifiable natural persons, and therefore do not constitute processing of personal data within the meaning of Article 4(2) GDPR. Should personal data be used in the future for the purposes described in this paragraph, it will be the responsibility of the Data Controller (whether the Company, the client, or, in the case of joint controllership, the party designated under the agreements to assume the obligation) to inform the data subjects and to ensure the existence of the necessary legal bases.

Definition of Personal Data and Processing

"Processing of personal data" means any operation concerning any information relating to a natural person who is identified or identifiable. For example, a first and last name and an email address associated with a "username" that can identify the individual (e.g., mariorossi@....) are considered "ordinary personal data," and the collection, recording, and use of such data to send a communication are considered "processing" operations, as are storage and sharing with other parties. Certain information, such as data relating to your health or your political or religious beliefs, constitutes special category personal data, which requires specific protection; however, the Company does not process such data. We invite you to visit the website of the Italian Data Protection Authority ("GPDP") for further information to better understand this topic (http://www.garanteprivacy.it/home/diritti).

▶ WHO TO CONTACT FOR REQUESTS OR COMPLAINTS?

The Data Controller can be contacted for any information regarding processing carried out in this capacity at the following contact details:

| Controllers's e-mail address | privacy@redo.finance |
|------------------------------|----------------------|
| | |

► I SUMMARY OF KEY POINTS

- ▶ We will process only ordinary personal data (e.g., browsing data, login and payment data, content of contact messages) and will use them solely within the limits set forth in this privacy notice, ensuring their security in accordance with applicable data protection laws.
- We will not retain any unnecessary information about you and will store your personal data only for the time strictly necessary to achieve the purposes of the processing (see table below).
- We will not process information that would allow us to identify the natural persons to whom the data required for model training and inference processing by our agents, based on client inputs, relate.
- Information relating to website users and operators with credentials will also be processed through automated, non-decision-making or non-evaluative processes.
- ▶ With regard to the Company's own purpose of developing new proprietary models (so-called "foundation models"), only information subjected to processing operations (embedding of already pseudonymized datasets) that render the data completely anonymous will be used.
- ► You may at any time request information or exercise all rights provided under Articles 15–22 of the GDPR, including the withdrawal of any consents granted, by contacting us at the following email address: privacy@redo.finance

► WHICH DATA ARE PROCESSED? WHY? HOW LONG?

The Data Controller, through the website, processes the personal data of data subjects for the purposes and in the manner described in the following sections. It should be noted that, for the purposes of this policy, processing activities that do not occur via the website but concern data subjects external to the Organization are also included, who may therefore benefit from convenient access to information regarding such processing through the online consultation of this Privacy Policy.



Website navigation

Common Personal Data (Article 6, EU Regulation 2016/679). The IT systems and software procedures supporting the operation of this website acquire, during their normal functioning, certain personal data whose transmission is implicit in the use of Internet communication protocols. These are information items that are not collected to be associated with identified data subjects but which, by their 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 users connecting to the website, the addresses in URI (Uniform Resource Identifier) 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

server's response (successful, error, etc.), and other parameters relating to the user's operating system and IT environment, as well as any logs collected by security systems active on the Controller's systems (e.g., firewalls).



Purpose and Legal Basis of Processing (Article 13(1)(c), EU Regulation 2016/679)

These data are used solely for the essential purpose of ensuring the proper functioning and security of the website. The legal basis for the processing is that provided under Article 122(1) of Legislative Decree No. 196/2003, as referenced by Provision No. 231 of 10 June 2021, point 5.



Scope of Communication (Article 13(1)(e)) and Transfer Outside the EU (letter f)

The data may be processed exclusively by internal personnel who are duly authorized and trained in data processing (Article 29) or by any parties responsible for website maintenance (appointed, in such cases, as Data Processors pursuant to Article 28) and will not be disclosed to other parties, made public, or transferred outside the EU. Only in the context of an investigation may the data be made available to the competent authorities. To know the identity of external parties responsible for the management and maintenance of the website, you may always contact the Data Controller at the address provided in the section "Who to Contact for Requests or Complaints?"



Retention Period of Data (Article 13(2)(a))

The data are retained for a maximum of 72 hours following the visit to the website and are subsequently deleted or stored only in anonymized form (statistical or aggregated data), except in cases of extensions related to investigative activities. The data retained period might be extended in the not public part of the platform if specific regulations (i.e. EU AI Act) might apply.



Provision of Data (Article 13(2)(f))

The data are not provided directly by the data subject but are automatically collected by the website's technological systems. Such provision is mandatory to the extent that, without it, safe navigation of the website would not be technically possible.



Logs Related to the Activities of Registered Users

Common Personal Data (Article 6, EU Regulation 2016/679). The IT systems and software procedures supporting the operation of the platform collect, track, and store logs related to user activities (such as configuration of accounts, permissions, and agents, file uploads, access to and consultation of inferences, and changes to settings).



Purpose and Legal Basis of Processing (Article 13(1)(c), EU Regulation 2016/679)

These data are collected in order to fulfill (or to allow clients to fulfill) regulatory obligations arising from applicable laws governing the provision and use of artificial intelligence systems, in particular as set out in Article 17 of Regulation (EU) 2024/1689 (Al Act) and, where generated by Al agents used for the self-provisioning and no-code delivery of services, pursuant to Article 19 of the Al Act.



Scope of Communication (Article 13(1)(e)) and Transfer Outside the EU (letter f)

The data may be processed exclusively by internal personnel who are duly authorized and instructed in accordance with Article 29, or by any parties responsible for website maintenance (appointed, in such cases, as Data Processors pursuant to Article 28), or, where a legal obligation applies, disclosed to clients. The data will not be disclosed to other parties, made public, or transferred to non-EU countries. Only in the context of an investigation may the data be made available to

the competent authorities. To obtain the identity of external parties responsible for the management and maintenance of the website, you may always contact the Data Controller at the address provided in the section "Who to Contact for Requests or Complaints?".



Retention Period of Data (Article 13(2)(a))

The data are retained for a maximum of 10 years from the time of collection when processed in compliance with Article 17 of the Al Act, or 6 months when processed in compliance with Article 19 of the Al Act, and are thereafter deleted or stored only in anonymised form (statistical or aggregated data), except in cases of extensions related to investigative activities.



Provision of Data (Article 13(2)(f))

The data are not provided directly by the data subject but are automatically collected by the website's technological systems. Such provision is mandatory to the extent that, without it, secure navigation of the website would not be technically possible.



Purchase of the Services of Genyo.ai

Ordinary Personal Data (Article 6, EU Regulation 2016/679). The website requires users to provide the information necessary to complete the purchase of the Controller's goods and/or services online (user account, payment data), in the forms and under the conditions set out in the Terms and Conditions available on the website. Additional information (address, billing and payment details) is also requested, as these are needed to carry out activities that are inseparably connected to completing the sale, such as processing payment and delivering the purchased services. For this purpose, the website relies on third-party services (Stripe/Link). To finalize the payment, the user will be redirected to the payment service provider's platform.



Purpose and Legal Basis of Processing (Article 13(1)(c), EU Regulation 2016/679)

These data are used for the purpose of fulfilling the contractual or precontractual obligations requested by the user on behalf of their organization (Article 6(1)(b)), consisting of the reservation or direct purchase of goods and/or services. In addition, these data are necessary to comply with the Controller's legal obligations, for example in tax matters and, where applicable, in relation to the prevention of cybercrime and money laundering (Article 6(1)(c)).



Scope of Communication (Article 13(1)(e)) and Transfer Outside the EU (letter f)

The data may be processed exclusively by internal personnel who are duly authorized and instructed in accordance with Article 29, or by any parties entrusted with activities that are inseparably connected to the provision of the service—such as payment operations (appointed, in such cases, as Data Processors pursuant to Article 28, unless acting as independent Controllers). The data will not be disclosed to other parties, made public, or transferred to non-EU countries. Only in the context of an investigation may the data be made available to the competent authorities. To obtain the identity of the external parties entrusted with these activities, you may always contact the Data Controller at the address provided in the section "Who to Contact for Requests or Complaints?".



Retention Period of Data (Article 13(2)(a))

The data are retained for a maximum of 10 years from the time of booking or completion of the purchase and are thereafter deleted or stored only in anonymised form (statistical or aggregated data), except in cases of extensions related to investigative activities.



Provision of Data (Article 13(2)(f))

The provision of data is mandatory to the extent that, without it, it is not technically possible to complete the purchase. This means that the user may choose not to provide the data; however, in such a case, it will not be possible to proceed with the reservation or online purchase.



Registration and Access to the Reserved Area of the Genyo.ai Platrform and services' use

Common Personal Data (Article 6, EU Regulation 2016/679). The website requires users to provide identification and contact information (access credentials) necessary to create an account enabling access to the platform's functionalities (admin), as well as information relating to third parties needed to create accounts with differentiated permissions granting access to specific features of the platform. Furthermore, for subsequent logins to the website, users must enter their username and password (which will never be visible to the Controller or to third parties), as well as the unique and temporary authentication code sent to the contact details provided (Strong Authentication).



Purpose and Legal Basis of Processing (Article 13(1)(c), EU Regulation 2016/679)

These data are used to complete registration on the website in accordance with its Terms and Conditions and to enable subsequent logins to the reserved area. The legal basis for the processing is the performance of contractual obligations, necessary to allow the user to access the authenticated functionalities, pursuant to Article 6(1)(b) of the GDPR.



Scope of Communication (Article 13(1)(e)) and Transfer Outside the EU (letter f)

The data may be processed exclusively by internal personnel who are duly authorized and trained in accordance with Article 29, or by any parties entrusted with activities inseparably connected to the service, such as website management and maintenance or secure authentication services, appointed in such cases as Data Processors pursuant to Article 28. The data will not be disclosed to other parties, made public, or transferred outside the EU. Only in the context of an investigation may the data be made available to the competent authorities. To obtain the identity of external parties responsible for these activities, you may always contact the Data Controller at the address provided in the section "Who to Contact for Requests or Complaints?".



Retention Period of Data (Article 13(2)(a))

The data are retained for a maximum of 10 years from the user's deregistration or from the provision of the booked service and are thereafter deleted or stored only in anonymised form (statistical or aggregated data), except in cases of extensions related to investigative activities.



Provision of Data (Article 13(2)(f))

The provision of data is mandatory to the extent that, without it, registration on the website would not be technically possible. This means that the user may choose not to provide the data; however, in such a case, it will not be possible to create an account.



Contacts and Responses to Received Messages

Ordinary Personal Data (Article 6, EU Regulation 2016/679). The website allows users to communicate with the Data Controller via a contact form or by sharing contact details. To enable these functionalities, the user must

provide certain identification and contact information (email address or mobile number, name) and may include additional personal data within the content of the message.



Purpose and Legal Basis of Processing (Article 13(1)(c), EU Regulation 2016/679)

These data are used solely to respond to the user regarding the messages received. This activity is carried out in the legitimate interest of the Data Controller, which outweighs the rights and freedoms of the data subjects (Article 6(1)(f)). Indeed, except in cases where the exchange constitutes a pre-contractual activity requested by the data subject (in which case the legal basis under Article 6(1)(b) applies), it is entirely reasonable to expect that a data subject sending a message is aware that individuals authorized by the Controller will process the limited information voluntarily provided, in order to satisfy their interest in receiving a response.



Scope of Communication (Article 13(1)(e)) and Transfer Outside the EU (letter f)

The data may be processed exclusively by internal personnel who are duly authorized and trained in accordance with Article 29, or by any parties entrusted with activities inseparably connected to the service, such as ordinary website management, appointed in such cases as Data Processors pursuant to Article 28. The data will not be disclosed to other parties, made public, or transferred outside the EU. Only in the context of an investigation may the data be made available to the competent authorities. To obtain the identity of external parties responsible for these activities, you may always contact the Data Controller at the address provided in the section "Who to Contact for Requests or Complaints?".



Retention Period of Data (Article 13(2)(a))

The data are retained for a maximum of 12 months from the date of the last message exchanged and are thereafter deleted or stored only in anonymised form (statistical or aggregated data), except in cases of extensions related to investigative activities.



Provision of Data (Article 13(2)(f))

The provision of data is mandatory to the extent that, without it, it is not technically possible to respond to the requests received. This means that the user may choose not to provide the data; however, in such a case, it will not be possible to proceed with the online transaction.



Rapporti con fornitori

Common Personal Data (Article 6, EU Regulation 2016/679). This section contains all the information regarding the processing of data that the Data Controller carries out in the context of normal relationships with suppliers, in order to conduct standard operations for the purchase of goods and services connected to the ordinary operations of the Organization. The data processed for this purpose include identification and contact information (name, surname, email address, or telephone number) of the customer or supplier as a natural person, or of their representatives in the case of customers or suppliers that are legal entities. Such information is necessary to maintain ordinary organizational relationships and exchange official communications, as well as to conclude the contracts governing the relationships between the parties (including the fulfillment of tax obligations, preparatory supplier qualification activities, and any checks on clients and suppliers as required by law, e.g., Legislative Decree 231/2001 and anti-money laundering regulations).



Purpose and Legal Basis of Processing (Article 13(1)(c), EU Regulation 2016/679)

These data are used solely for the purpose of executing contractual and pre-contractual measures and the related legal obligations; they are therefore legitimized under Article 6(1)(b) and (c) of the GDPR.



Scope of Communication (Article 13(1)(e)) and Transfer Outside the EU (letter f)

The data may be processed exclusively by internal personnel who are duly authorized and trained in accordance with Article 29, or by any parties entrusted with activities inseparably connected to the service, such as ordinary website management, appointed in such cases as Data Processors pursuant to Article 28. The data will not be disclosed to other parties, made public, or transferred outside the EU. Only in the context of an investigation may the data be made available to the competent authorities. To obtain the identity of external parties responsible for these activities, you may always contact the Data Controller at the address provided in the section "Who to Contact for Requests or Complaints?".



Retention Period of Data (Article 13(2)(a))

The data are retained for a maximum of 10 years from the termination of the contractual relationships and are thereafter deleted or stored only in anonymised form (statistical or aggregated data), except in cases of extensions related to investigative activities



Provision of Data (Article 13(2)(f))

The provision of data is mandatory to the extent that, without it, the continuation or initiation of the contractual relationship would not be technically possible. This means that the data subject may choose not to provide the data; however, in such a case, it will not be possible to proceed with the intended contractual relationship.



Defense of the Data Controller in Legal Proceedings

inally, it should be noted that all data referred to in the preceding table may be processed by the Data Controller for the purpose of exercising its right of defense in legal proceedings (Articles 6(1)(f) and 9(2)(f) GDPR). Indeed, the Data Controller has a prevailing legitimate interest in this regard, as established by consolidated case law, e.g., Cassation Order No. 19531/2021, according to which "the interest in the confidentiality of personal data must yield in the face of the protection of other legally relevant interests, configured by the legal system as prevailing in the necessary balancing carried out, including the interest, when genuine and not spurious, in exercising the right of defense in legal proceedings." Such processing may occur if, prior to the expiration of the retention periods indicated, a pre-litigation phase or a formal dispute arises. In such cases, the retention of data will be extended for the entire duration of the dispute, and the data may be disclosed to professionals entrusted with the defense of the Data Controller in legal proceedings (acting, generally, as independent Controllers or, where necessary, appointed as Data Processors pursuant to Article 28) and to the judicial or supervisory authority before which the dispute is brought..

COSA SONO I COOKIES? IL SITO NE FA USO?

Cookies are small text fragments (letters and/or numbers) that allow the web server to store information on the client (the browser) to be reused during the same visit to the website (session cookies) or later, even after several days (persistent cookies). Cookies are stored, according to the user's preferences, by the individual browser on the specific device used (computer, tablet, smartphone). Similar technologies, such as web beacons, transparent GIFs, and all forms of local storage introduced with HTML5, can be used to collect information about user behavior and service usage. In the remainder of this privacy notice, we will refer to cookies and all similar technologies simply as "cookies."

For further information on the cookies used by this website, please consult the cookie policy: https://www.iubenda.com/privacy-policy/43881143/cookie-policy?an=no&s_ck=false&newmarkup=yes

▶ WHY PLUGIN OF SOCIAL NETWORK AND APP ARE USED?

This website also incorporates plugins and/or buttons for social networks, allowing easy sharing of content on your preferred social networks. These plugins are designed not to set any cookies when the page is accessed, in order to protect users' privacy. Cookies are only set, if provided by the social networks, when the user actively and voluntarily uses the plugin. Please note that if the user is logged into the social network while browsing, they have already consented to the use of cookies delivered through this website at the time of registration with the social network. The collection and use of information obtained through the plugin are governed by the respective privacy policies of the social networks, which should be consulted for further information.

Facebook (link cookie policy)
Twitter (link cookie policy)
LinkedIn (link cookie policy)
TiKToK (link cookie policy)
Paypal (link cookie policy)
Instagram (link cookie policy)
YouTube (link cookie policy)

► HOW ARE DATA PROCESSED?

Fundamental Principles and Data Security

In accordance with the GDPR, the processing of data subjects' personal data will be carried out in compliance with the principles of lawfulness, fairness, transparency, and data minimization. Personal data will be processed by personnel who are formally authorized and trained, primarily through electronic or automated means, following procedures and using tools designed to ensure the security and confidentiality of the data. All necessary technical and organizational measures will be adopted to guarantee the level of data protection required by law. Key security measures include: authentication management via AWS Cognito with two-factor authentication, backups, user accounts with differentiated permissions, log recording, separation of Genex and Platform environments, and use of VPNs. For a comprehensive list of measures, technical documentation can be requested by contacting the Data Controller through the contact channels indicated in this document.

▶ WHAT RIGHTS DO I HAVE AS A DATA SUBJECT? HOW CAN I EXERCISE THEM?

A titolo esemplificativo, gli interessati possono esercitare, nei confronti del Titolare del trattamento, i seguenti diritti:

- Right of Access (Article 15 GDPR): The data subject has the right to be informed about the processing of their personal data and to obtain a copy of such data.
- Right to Rectification (Article 16 GDPR): The data subject has the right to have inaccurate personal data concerning them corrected.
- Right to Erasure (Article 17 GDPR): The data subject has the right to have their personal data deleted without undue delay.
- ▶ Right to Restriction of Processing (Article 18 GDPR): The data subject has the right to obtain the restriction of processing of their personal data in specific cases, such as when contesting the accuracy of the data or in the case of unlawful processing.
- Right to Data Portability (Article 20 GDPR): The data subject has the right to receive their personal data in a structured, commonly used, and machine-readable format, and to transmit it to another data controller.
- Right to Object (Article 21 GDPR): The data subject has the right to object to the processing of their personal data for legitimate reasons related to their specific situation.
- Right Not to Be Subject to Automated Decision-Making (Article 22 GDPR): The data subject has the right not to be subject to a decision based solely on automated processing.

Data subjects may exercise their rights and request additional information regarding the processing by contacting the Data Controller at the following email address: privacy@redo.finance. Data subjects who believe that the processing of their personal data violates the provisions of the Regulation have the right to lodge a complaint with the Supervisory Authority, as provided under Article 77 of the Regulation, or to seek remedies through the competent judicial authorities (Article 79 of the Regulation).

► CAN THE DATA CONTROLLER MODIFY THIS PRIVACY POLICY?

The Data Controller reserves the right, at any time, to change, modify, update, add to, or remove parts of this privacy notice, while ensuring, in any case, an adequate and equivalent level of personal data protection. Should the Data Controller make significant changes to this notice (e.g., processing personal data for different or additional purposes), data subjects will be informed through the most appropriate and timely means.

Last Update 24/11/2025