

# PRIVACY POLICY

This document has been specifically drawn up to inform the "User", the "User Partner" and/or the person to whom the products/services purchased by the User may be addressed (hereinafter, the "Recipient") - about the processing of his/her personal data carried out by 3Bee S.R.L. through this Website (hereinafter, the "Website") as well as through the webapp accessible through the following link <https://app.3bee.com/#/> (hereinafter, the "WebApp"). Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter, "GDPR") the following information is provided to you:

## 1. PREMISES

- PREMISES VALID AND APPLICABLE TO ALL TYPES OF AFFECTED PERSONS: "USERS", "RECIPIENTS" and "PARTNER USERS".

## 2. USERS

- (A) "USER" INFORMATION EX. ART. 13 GDPR
- (B) "RECIPIENT" INFORMATION EX. ART. 14 GDPR

## 3. USER PARTNER

- INFORMATION "PARTNER USER" EX ART. 13 GDPR

## 1. PREMISES

### DATA CONTROLLER

The Data Controller - as defined pursuant to Art. 4, co. 1, no. 7) of the GDPR - is the Company 3BEE S.R.L. with registered office in Trezzo sull'Adda (MI), Via Volta no. 4, P. VAT, tax code and registration number with the Register of Companies of Milan, Monza-Brianza and Lodi 09711590969, capital of € 42,482.96 (of which € 39,084.32 paid up), R.E.A. No. MI - 2109101, registered address PEC: [3bee@legalmail.it](mailto:3bee@legalmail.it) (hereinafter referred to as the "Holder").

The Data Controller has appointed, pursuant to and in accordance with Art. 37 of the GDPR, a Data Protection Officer (hereinafter referred to as 'DPO'), who can be contacted at the following e-mail address: [privacy@3bee.com](mailto:privacy@3bee.com).

### INTRODUCTORY INFORMATION

For a better understanding of the information and documents shared herein, below are some definitions directly contained in the provisions of the GDPR. Pursuant to Art. 4, para. 1 of the GDPR, the following definitions apply:

"personal data": any information concerning an identified or identifiable natural person ("data subject"). An identifiable natural person is any natural person who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity;

'processing' means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

'controller' means the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data

"Data controller" shall mean the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

"data subject's consent": any freely given, specific, informed and unambiguous manifestation of will by which the data subject signifies his or her assent, by way of a statement or unambiguous affirmative action, to personal data relating to him or her being processed.

In addition to the above, in order to allow for a complete understanding of this document, the following terms, in the singular and plural, shall have the meanings indicated below:

"Products": the products that can be purchased by the User through the Site (e.g. honey; the e-book; the bee "house" and/or bee cocoons..);

"Services": the services provided through the Site by 3Bee (e.g. "Adopt a hive"; "Adopt a Tree");

"User": any subject who accesses and uses the Site and/or the Webapp;

"Partner User": the natural or legal person, other than the Owner, who, through the Site and the WebApp, provides services in favour of Users, acting in the exercise of their commercial, craft or professional activity (e.g. beekeepers, farmers, companies...).

## PROCESSING METHODS AND STORAGE TIME

We would like to inform you that the processing of your data is carried out in compliance with the GDPR and the current legal provisions on the processing of personal data. We inform you that the processing of your personal data is based on the principles laid down in Article 5 of the GDPR, in particular on the principles of correctness, lawfulness, transparency and protection of the confidentiality and rights of the person whose data is processed. Your personal data will be processed by computer and telematic means, in such a way as to guarantee security and confidentiality in accordance with the provisions of Article 32 of the GDPR. Your personal data will be kept by the Data Controller for the period of time strictly necessary to achieve the purposes for which they were collected, and in any case in compliance with the principle of minimisation referred to in Article 5(1)(c) of the GDPR as well as with the obligations provided for by law. In any event, it should be noted that once the retention period established by current legislation has expired, the data will be subject to deletion. This is without prejudice, in any case, to the further retention of personal data for

specific accounting/fiscal purposes as provided for in the matter of accounting records pursuant to Article 2220 of the Civil Code.

## TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION

We inform you that your personal data will be processed by the Controller exclusively within the territory of the European Union. The data you provide will therefore not be transferred by the Controller to third countries located outside the European Economic Area. Should it become necessary, for technical and/or operational reasons, to use subjects located outside the European Union (EU) or the European Economic Area (EEA), or should it become necessary to transfer some of the data collected to technical systems and services managed in the cloud and located outside the area of the European Union or the European Economic Area, the processing will be regulated in accordance with the provisions of Chapter V of Reg (EU) 679/2016. The Data Controller - where applicable - will take the necessary precautions for a legitimate data transfer (in particular, through the use of the Standard Contractual Clauses approved by the European Commission). In any case, you can ask about the transfer abroad of your personal data at any time by contacting us at the email address indicated in the following paragraph.

## RIGHTS OF THE DATA SUBJECT

Pursuant to Art. 7 para. 3 of the GDPR, we inform you that you may at any time revoke your consent without prejudice to the lawfulness of the processing based on the consent given prior to revocation. By submitting your request directly to the Controller's registered office indicated above or by using the following e-mail address: [privacy@3bee.com](mailto:privacy@3bee.com), you may at any time, pursuant to Articles 15 to 22 of the GDPR, exercise your right to

- a. request confirmation of the existence or otherwise of your personal data
- b. obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom your personal data have been or will be disclosed and, when possible, the storage period
- c. obtain the rectification and erasure of your personal data
- d. obtain the restriction of the processing of your data
- e. obtain portability of the data, i.e. receive them from a data controller, in a structured, commonly used and machine-readable format, and transmit them to another data controller without hindrance
- f. object to the processing at any time and also in the case of processing for direct marketing purposes;
- g. object to an automated decision-making process concerning individuals
- h. request from the Controller access to and rectification or erasure of data or restriction of processing concerning him/her, or to object to the processing of data, in addition to the right to data portability
- i. revoke consent at any time without prejudice to the lawfulness of the processing based on the consent given before revocation
- j. to lodge a complaint with a supervisory authority.

Finally, we inform you that the Data Controller may request further information necessary to confirm the identity of the data subject.

## 2. (A) "USER"- Information pursuant to Art. 13 GDPR

### CATEGORIES OF PROCESSED DATA

Through the navigation and use of this Site and/or the WebApp the following categories of personal data may be processed:

a. data necessary for the purchase of the Products/Services offered by the Owner through the Site. Specifically, the User may be asked for common personal data (name, surname), contact information (e-mail address, telephone number, address of residence/shipping of the purchased Products), payment data (card number, expiry date, CVV and billing address, PayPal address, bank data necessary to make a transfer);

b. IP address;

c. any personal data entered at the User's discretion when creating a personal profile on the WebApp (photographs, gender, date of birth)

d. any additional information that the User chooses to provide by filling in the appropriate forms for customer support/requesting information on the Services/Products offered by the Data Controller

e. data collected through cookies, subject to your consent, as better described in the Cookie Policy available at the following link [https://www.3bee.com/documents/cookie\\_policy.pdf](https://www.3bee.com/documents/cookie_policy.pdf);

### PURPOSE OF PROCESSING AND LEGAL BASIS

The personal data you provide are processed by the Controller for the purposes set out below:

a. PURPOSE: navigation on this Website and/or on the WebApp;  
LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties

b. PURPOSE: IT systems management  
LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties

c. PURPOSE: the conclusion and execution of the purchase contract on this Site of one or more Products, for payment, shipping of the Product, the possible management of the right of withdrawal, return and legal guarantee;  
LEGAL BASIS OF THE PROCESSING: for this purpose, the legal basis is Art. 6, co. 1, letter b) of the GDPR, according to which the processing is necessary for the performance of a

contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request;

d. PURPOSE: provision of the requested Service by the Controller;  
LEGAL BASIS OF THE PROCESSING: for this purpose, the legal basis is Art. 6, para. 1, letter b) of the GDPR, according to which the processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request;

e. PURPOSE: defence of rights in the context of a lawsuit brought against the Controller and related prodromal and/or related activities

#### DISCLOSURE OF YOUR PERSONAL DATA

We inform you that your personal data are not subject to dissemination, this term being understood to mean the disclosure of such data to unspecified parties, in any form whatsoever, including by making them available or consulting them. On the other hand, this is without prejudice to the case in which disclosure is requested from the Controller, in compliance with legal provisions, by public authorities, judicial authorities, supervisory and control bodies, information and security organisations or other public subjects and/or bodies for purposes of defence and state security, prevention and detection or repression of crimes. To achieve the purposes described in the previous section, the Data Controller may need to communicate your personal data to the following categories of subjects

a. natural persons authorised by the Data Controller to process personal data pursuant to and for the purposes of Art. 29 of the GDPR by reason of the performance of their work duties;

b. persons who have been appointed by the Data Controller pursuant to Article 28 of the GDPR as data processors such as, by way of example but not limited to, persons who provide services for the management of the digital communication system and otherwise, employment consultants, financial and accounting consultants, etc.

c. suppliers of payment services, at the time of purchase of the Products/Services;

d. Partner Users

## 2. (B) "RECIPIENTS" - Information pursuant to Article 14 of the GDPR

#### SOURCE OF PERSONAL DATA

The source of your personal data is the person who contacted the Controller in order for the Service purchased by the User to be provided to you and/or for you to receive the Product purchased by the User.

#### CATEGORIES OF DATA PROCESSED

In order to enable the provision of the Service purchased by the User in his/her favour and/or the delivery of the Product purchased by the User in his/her favour, the Controller may process the following categories of personal data

a. common personal data (first name, last name) and/or contact information (e-mail address) of the Recipient.

b. IP address;

c. data collected through cookies, subject to his/her consent, as better described in the Cookie Policy available at the following link [https://www.3bee.com/documents/cookie\\_policy.pdf](https://www.3bee.com/documents/cookie_policy.pdf);

#### PURPOSE OF PROCESSING AND LEGAL BASIS

Personal data are processed by the Controller for the purposes set out below:

a. PURPOSE: browsing this Website and/or the WebApp;

LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties

b. PURPOSE: IT systems management

LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties

c. PURPOSE :to enable the Recipient to receive the Product/Service purchased by the User in his/her favour

LEGAL BASIS OF THE PROCESSING: for this purpose, the legal basis is Art. 6, co. 1, letter b) of the GDPR, according to which the processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request;

d. PURPOSE: defence of rights in the context of a lawsuit brought against the Controller and related prodromal and/or connected activities

LEGAL BASIS OF THE PROCESSING: for this purpose, the legal basis is Art. 6, co. 1, letter f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties;

e. PURPOSE: compliance with obligations imposed by laws or regulations

LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter c) of the GDPR, according to which the processing is necessary for the fulfilment of a legal obligation to which the Controller is subject.

f. PURPOSE: compliance with tax and accounting obligations;

LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter c) of the GDPR, according to which the processing is necessary for the fulfilment of a legal obligation to which the Controller is subject.

g. PURPOSE: registration to the Site and/or on the WebApp and the use of services reserved for registered users.

LEGAL BASIS OF THE PROCESSING: for this purpose, the legal basis is Art. 6, co. 1, letter b) of the GDPR, according to which the processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request.

#### COMMUNICATION OF YOUR PERSONAL DATA

We would like to inform you that your personal data are not subject to dissemination, this term being understood to mean the disclosure of such data to unspecified parties, in any form whatsoever, including by making them available or consulting them. On the other hand, this is without prejudice to the case in which disclosure is requested from the Controller, in compliance with legal provisions, by public authorities, judicial authorities, supervisory and control bodies, information and security organisations or other public subjects and/or bodies for purposes of defence and state security, prevention and detection or repression of crimes. To achieve the purposes described in the previous section, the Data Controller may need to communicate your personal data to the following categories of subjects

- a. individuals authorised by the Data Controller itself to process personal data pursuant to and for the purposes of Article 29 of the GDPR by reason of the performance of their work duties;
- b. parties that have been appointed by the Data Controller pursuant to Article 28 of the GDPR as data processors such as, by way of example but not limited to, parties that provide services for the management of the digital communication system and otherwise, employment consultants, financial and accounting consultants, etc.

### 3. "PARTNER USERS": Information pursuant to Article 13 of the GDPR

This privacy policy has been prepared in order to inform you, the Partner User, about the processing of your personal data carried out by 3Bee S.r.l. through this Site and/or the WebApp. Pursuant to the GDPR, the following information is provided to you.

#### CATEGORIES OF PROCESSED DATA

Through the navigation and use of this Website and/or the WebApp the following categories of personal data may be processed:

- a. data transmitted by the User Partner to the Data Controller in order to obtain information on (i) possible partnerships to be entered into with the Data Controller (ii) as well as on the Products / Services offered by the Data Controller through the Site. In this sense, the following data may be requested from the Partner Users when filling in the appropriate forms on the Site: common personal data (first name, last name) and contact information (e-mail

address, telephone number), address of a point of sale of the Partner User, further information that the Partner User chooses to share with the Controller by filling in the appropriate forms in order to receive customer support/request information on the Services/Products offered by the Controller.

b. IP address;

c. any personal data entered by the User Partner when creating the profile on the WebApp (photographs, gender, date of birth)

e. data collected through cookies, subject to his/her consent, as better described in the Cookie Policy available at the following link [https://www.3bee.com/documents/cookie\\_policy.pdf](https://www.3bee.com/documents/cookie_policy.pdf);

#### PURPOSE OF PROCESSING AND LEGAL BASIS

The personal data you provide are processed by the Controller for the purposes set out below:

a. PURPOSE: browsing this Website and/or the WebApp;  
LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties

b. PURPOSE: IT systems management  
LEGAL BASIS OF THE PROCESSING: for this purpose, the legal basis is Art. 6(1)(f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interests of the Data Controller or of third parties

c. PURPOSE: defence of rights in the context of a lawsuit brought against the Controller and related prodromal and/or related activities  
LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter f) of the GDPR, according to which the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties;

d. PURPOSE: compliance with obligations imposed by laws or regulations  
LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter c) of the GDPR, according to which the processing is necessary for the fulfilment of a legal obligation to which the Controller is subject.

e. PURPOSE: compliance with tax and accounting obligations;  
LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter c) of the GDPR, according to which the processing is necessary for the fulfilment of a legal obligation to which the Controller is subject.

f. PURPOSE: registration to the Site and/or on the WebApp and the use of services reserved for registered users.  
LEGAL BASIS OF THE PROCESSING: for this purpose, the legal basis is Art. 6, co. 1, letter b) of the GDPR, according to which the processing is necessary for the performance of a



contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request.

g. PURPOSE: if desired, sending material of an advertising and informative nature, of a promotional and/or commercial nature by e-mail (e.g. including newsletters) concerning the Services/Products offered by the Controller;

LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter a) of the GDPR, according to which the data subject has given consent to the processing of his/her personal data for one or more specific purposes.

h. PURPOSE: if you wish, to be contacted by the Data Controller in order to process the requests you have made by filling in the appropriate form on the Website

LEGAL BASIS OF THE PROCESSING: for this purpose the legal basis is Art. 6, co. 1, letter a) of the GDPR, according to which the data subject has given consent to the processing of his/her personal data for one or more specific purposes.

The provision of personal data is optional for all processing purposes referred to in points g) and h) above of this Privacy Policy. Failure to do so will make it impossible for you to obtain the requested service (such as, for example, the sending of commercial information; the processing of your requests, the receipt of the newsletter;).

In any case, this is without prejudice to the right to revoke the consent given, as provided for in Art. 7 para. 3 of the GDPR, if the same constitutes the legal basis for the processing.

#### COMMUNICATION OF YOUR PERSONAL DATA

We would like to inform you that your personal data are not subject to dissemination, this term being understood to mean the disclosure of such data to unspecified parties, in any form whatsoever, including by making them available or consulting them. On the other hand, this is without prejudice to the case in which disclosure is requested from the Controller, in compliance with legal provisions, by public authorities, judicial authorities, supervisory and control bodies, information and security organisations or other public subjects and/or bodies for purposes of defence and state security, prevention and detection or repression of crimes.

To achieve the purposes described in the previous section, the Data Controller may need to communicate your personal data to the following categories of subjects

a. individuals authorised by the Data Controller itself to process personal data pursuant to and for the purposes of Article 29 of the GDPR by reason of the performance of their work duties;

b. persons who have been appointed by the Data Controller pursuant to Article 28 of the GDPR as data processors such as, by way of example but not limited to, persons who provide services for the management of the digital communication system and otherwise, labour consultants, legal, financial, accounting consultants, etc.

c. Users