

# NOTICE ON THE PROCESSING OF PERSONAL DATA

*(provided pursuant to Article 13 of Regulation (EU) 2016/679 – GDPR)*

*Version 1.0 – Date 23/04/2026*

This notice (hereinafter, the “Notice”) describes the manner in which **lab-go S.r.l.** (the “Company” or “Data Controller”), in its capacity as Data Controller, processes the personal data of users (hereinafter, “Users”) who register on its proprietary digital platform known as “FANCARDSCREW” (“Platform”), which can be accessed from any device connected to the internet and whose homepage is available at the URL: <https://www.wearefancards.com>, and who use the related services. This Privacy Policy forms an integral part of the Platform’s Terms and Conditions of Use and is provided in accordance with Article 13 of Regulation (EU) 2016/679 (“GDPR”).

The Company undertakes to process personal data in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality and accountability (Article 5 of the GDPR).

## 1. Data Controller

The data controller is **lab-go S.r.l.**, a company incorporated under Italian law, Tax Code / VAT No. 11511430966, with registered office in Milan (MI) (20123), at Via dei Patti No. 8, registered in the REA Business Register: MI-2706166, in the person of its legal representative pro tempore

Privacy contacts: [privacy@wearefancards.com](mailto:privacy@wearefancards.com) – Certified email (PEC) [lab-go@pec.it](mailto:lab-go@pec.it) – postal address as indicated above.

## 2. Data Protection Officer (DPO)

2.1 As of the date of issue of this Policy, and taking into account the stage of the Project, the Company has not appointed a Data Protection Officer (DPO), as the conditions set out in Article 37 of the GDPR do not currently apply.

2.2 The Company constantly monitors the development of processing carried out via the Platform and undertakes to appoint a DPO without delay should, due to the nature, scope, purposes or scale of the processing, such appointment become mandatory under Article 37 of the GDPR (in particular, in the event of regular and systematic monitoring of data subjects on a large scale). In such a case, the update will be communicated in this Policy.

2.3 In the meantime, the Company’s data protection officer can be contacted at [privacy@wearefancards.com](mailto:privacy@wearefancards.com).

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FANCREW Portal Privacy Policy – version 01 dated 23/04/2026

**lab-go S.r.l.**

Via dei Piatti, No. 8 (20123) Milan (MI), Italy

VAT No. / Tax Code 11511430966

REA: MI-2706166

Email: [info@lab-go.com](mailto:info@lab-go.com) – Certified email: [lab-go@pec.it](mailto:lab-go@pec.it)

### 3. Categories of personal data processed

In the context of providing the Platform's services, the Company processes the following categories of personal data:

- identification and contact details: first name, surname, date of birth, country of residence, email address, telephone number (where provided);
- authentication data: user ID and password (stored in encrypted form using non-reversible hashing algorithms), session token, additional authentication factors where activated;
- CV details: educational qualifications, work experience, skills, languages spoken, willingness to relocate, other information freely provided by the User for the purposes of the Application;
- images: photographs voluntarily provided by the User in connection with the Application;
- geolocation data: geolocation coordinates provided by the User, exclusively where necessary to verify consistency between the Application and the location of any future job opportunity;
- browsing data and technical logs: IP address, timestamp, user-agent, pages visited, time spent on site, session identifiers, system logs for security purposes;
- data relating to the use of Training Content: content accessed, progress, duration of use;
- data relating to the User's preferences regarding Events (where the User chooses to receive notifications);
- complaints and enquiries: correspondence between the User and the Company.

3.2 The Company does not intentionally collect special categories of personal data as referred to in Article 9 of the GDPR (health data, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, racial or ethnic origin, biometric or genetic data). The User undertakes not to voluntarily enter data of this nature in the free-text fields of the Application form. Should data of a special category nevertheless be entered, the Company will delete such data as soon as it becomes aware of it.

3.3 The Company does not collect personal data from individuals under the age of eighteen. Access to the Platform is restricted to adults, as provided for in the Terms and Conditions of Use.

### 4. Purposes of processing and legal bases

The Company processes Users' personal data for the purposes and on the legal bases set out below:

Purpose	Description	Legal basis	Retention
<b>a) Account registration and management</b>	To enable the creation and management of the Account, authentication and secure access.	Performance of the contract pursuant to Article 6(1)(b) of the GDPR (T&Cs).	Duration of the contractual relationship + ten-year limitation period (Article 2946 of the Italian Civil Code).
<b>b) Collection and assessment of applications</b>	To receive, store and assess unsolicited applications for the Company's own use in	Performance of pre-contractual measures at the data subject's	24 months from receipt or the last update, unless otherwise

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	relation to potential future job opportunities.	request pursuant to Article 6(1)(b) of the GDPR.	requested by the User; possible extension in the event of active evaluation (see Data Protection Authority ruling on CVs).
<b>c) Provision of Training Content</b>	Making freely accessible information content available, tracking usage for the purpose of improving the service.	Performance of the contract pursuant to Article 6(1)(b) of the GDPR.	Duration of the relationship + 12 months for aggregated usage data.
<b>d) Communication of Events</b>	To send information regarding music and sporting events covered by a mandate received from bands/sports clubs and/or from such parties communicated to the Company.	Consent pursuant to Article 6(1)(a) of the GDPR for promotional communications.	Duration of the relationship; consent may be withdrawn at any time.
<b>e) Security and integrity of the Platform</b>	Detection of anomalous access, fraud prevention, protection of data and infrastructure security.	Legitimate interest of the data controller pursuant to Article 6(1)(f) of the GDPR (protection of company assets and service continuity), balanced against the rights of Users.	Security logs: 12 months (extendable in the event of litigation or ongoing investigations).
<b>f) Regulatory and tax compliance</b>	To comply with the obligations set out in applicable legislation and to respond to requests from the authorities.	Legal obligation pursuant to Article 6(1)(c) of the GDPR.	Time limit set out in sector-specific legislation.
<b>g) Handling of complaints and disputes</b>	To respond to complaints from Users; to exercise and defend rights in or out of court.	Legitimate interest of the data controller pursuant to Article 6(1)(f) of the GDPR; or Article 9(2)(f) for any special categories of data involved in the dispute.	Duration of the dispute + ten-year limitation period.
<b>h) Potential establishment of an employment relationship</b>	Should the Application result in a contractual offer, to manage the contractualisation phase.	Pre-contractual measures / legal obligations pursuant to Article 6(1)(b) and (c) of the GDPR.	Duration of negotiations; subsequently governed by a specific employee information notice.

4.1 The provision of data necessary for purposes a), b), c), e), f), g) and h) is a prerequisite for Registration and the use of the Services; failure to provide such data will make it impossible to provide the Services.

4.2 The provision of data for purpose d), limited to promotional communications, is optional; consent, where given, may be withdrawn at any time without affecting the lawfulness of processing based on consent given previously (Article 7(3) of the GDPR).

## 5. Methods of processing

5.1 Personal data is processed using manual and electronic means, in accordance with logic strictly related to the purposes indicated and in such a way as to ensure the security, integrity and confidentiality of the data, in accordance with Article 32 of the GDPR.

5.2 The Company adopts appropriate technical and organisational measures, including, by way of example: (i) encryption of data in transit (TLS) and at rest where technically possible; (ii) strong authentication systems and centralised credential management; (iii) access controls on a need-to-know basis; (iv) logging and monitoring; (v) periodic backups and disaster recovery procedures; (vi) training of authorised personnel; (vii) incident management and data breach notification procedures in accordance with Articles 33–34 of the GDPR.

## 6. Automated decision-making and profiling

6.1 The Company does not subject Users to decisions based solely on automated processing, including profiling, which produce legal effects or similarly significantly affect them (Article 22 of the GDPR).

6.2 In particular, the assessment of Applications is carried out on an individual basis by qualified staff of the Company; at present, there is no algorithm for automatic matching between User data and job opportunities.

## 7. Recipients of the data

Personal data may be disclosed, exclusively for the purposes indicated above and to the extent strictly necessary, to the following categories of recipients:

- authorised staff of the Company;
- IT, hosting, maintenance, development and technical support service providers for the Platform (appointed as Data Processors pursuant to Article 28 of the GDPR);
- authorised third parties for the provision of Training Content, limited to the data strictly necessary (Processors pursuant to Article 28 of the GDPR);
- professionals and consultants (solicitors, accountants, auditors) within the scope of the mandate conferred;
- public, administrative and judicial authorities, within the limits of legal obligations and legitimate requests;

- parties involved in any extraordinary corporate transactions (mergers, acquisitions, disposals of business units), in compliance with applicable legislation.

7.1 In line with the classification of the collection of Applications as self-recruitment for the Company's exclusively private use, the data of Applications will not be disclosed to third-party employers for placement purposes. The Company does not carry out intermediary activities within the meaning of Legislative Decree 276/2003.

7.2 An up-to-date list of Data Processors may be requested by writing to [privacy@wearefancards.com](mailto:privacy@wearefancards.com).

## 8. Data transfers outside the European Union

8.1 As of the date of this Policy, the Company does not transfer personal data to countries outside the European Economic Area (EEA): all data is processed at facilities located within the EEA.

## 9. Data retention period

9.1 The retention periods are detailed in the table in Article 4. In any case, data will be retained for the time strictly necessary to achieve the purposes for which it was collected, in accordance with the principles of storage limitation and data minimisation (Article 5(1)(c) and (e) of the GDPR).

9.2 Once the retention periods have expired, the data will be deleted or irreversibly anonymised, subject to any retention obligations imposed by law and the retention necessary for the establishment, exercise or defence of a legal claim.

9.3 In particular:

Data category	Retention period
<b>Account data</b>	For the entire duration of the relationship + 10 years (ordinary limitation period pursuant to Article 2946 of the Italian Civil Code)
<b>Application data</b>	24 months from receipt or the last voluntary update, unless otherwise requested by the User
<b>Images attached to the Application</b>	Same retention period as for Application Data
<b>Geolocation</b>	Until the purpose of consistency verification has been fulfilled, after which the data will be deleted or anonymised
<b>Security logs</b>	12 months (unless there are ongoing disputes)
<b>System administrator access logs</b>	6 months (see Data Protection Authority Provision of 27 November 2008)
<b>Billing/tax data</b>	10 years pursuant to Article 2220 of the Civil Code
<b>Marketing consent (if given)</b>	Until revoked + proof of revocation
<b>Data relating to complaints/disputes</b>	Duration of the dispute + 10 years

## 10. Rights of data subjects

10.1 In accordance with Articles 15–22 of the GDPR, the User has the right, at any time, to:

- right of access (Article 15): to obtain confirmation as to whether or not processing is taking place and, if so, to obtain a copy thereof;
- right to rectification (Article 16): to have inaccurate or incomplete data rectified;
- right to erasure (Article 17): to have data erased in the cases provided for;
- right to restriction of processing (Art. 18): to obtain the restriction of processing in the cases provided for;
- right to data portability (Art. 20): to receive data concerning you in a structured, commonly used and machine-readable format and to transmit such data to another controller;
- right to object (Art. 21): to object, on grounds relating to your particular situation, to processing based on legitimate interests; and to object at any time to the processing of data for direct marketing purposes;
- the right not to be subject to decisions based solely on automated processing (Art. 22);
- the right to withdraw consent (Art. 7(3)) at any time, without affecting the lawfulness of processing carried out prior to withdrawal;
- the right to lodge a complaint with the competent supervisory authority (for Italy: Garante per la protezione dei dati personali, [www.gpdp.it](http://www.gpdp.it)).

10.2 The User may exercise their rights by sending a written request to [privacy@wearefancards.com](mailto:privacy@wearefancards.com), clearly stating the subject of the request and attaching a copy of an identity document or other suitable means of identification.

10.3 Once the Company has verified the identity of the Data Subject, it will respond to the request without undue delay and, in any event, within one month of receipt; this period may be extended by two months, if necessary, taking into account the complexity and number of requests, with notification to the User (Article 12(3) of the GDPR).

10.4 The response is provided free of charge, except in the case of manifestly unfounded or excessive requests.

## 11. Cookies and tracking technologies

11.1 Detailed information on the Platform's use of cookies and similar technologies is set out in the Cookie Policy.

11.2 The processing of data via technical cookies is based on legitimate interest; the use of profiling cookies, third-party analytics and tracking tools is subject to the User's consent, obtained via a specific banner in accordance with applicable legislation.

## 12. Special section for Users residing outside the European Union

The Company undertakes to respect Users' rights in accordance with the mandatory regulations of their respective countries of residence.

## 13. Changes to this Policy

14.1 This Policy may be updated, including in light of changes to applicable legislation or the Services offered. The updated version will be promptly published on the Platform with an indication of the date of issue; substantial changes will be communicated to the User by appropriate means (e.g. email or notification in the Reserved Area).

14.2 Users are advised to consult this Policy periodically to check for the latest version.

## 14. Complaints to the Supervisory Authority

Without prejudice to any other administrative or judicial remedy, a User who considers that the processing of their personal data infringes applicable legislation has the right to lodge a complaint with the competent supervisory authority for their country of habitual residence, for the country in which they work, or for the country in which the alleged infringement occurred. For Italy: Garante per la protezione dei dati personali – Piazza Venezia n. 11 - 00187 Rome – [www.gpdp.it](http://www.gpdp.it) – [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it).

*This Policy is made available to the User upon Registration on the Platform, in a manner that allows for its full reading, storage on a durable medium and printing. Electronic evidence of having read the Policy is collected by means of a specific tick box in the Registration process.*

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## DECLARATION OF CONSENT

Having read the Privacy Policy provided by lab-go S.r.l. regarding the processing that will be carried out via the Platform, with specific reference to the purpose indicated therein under Article 4(d) (*Sending information regarding musical and sporting events or initiatives covered by a mandate received from bands/sports clubs and/or from such entities communicated to the Company*)

I do

I do not

my consent to the processing of my personal data.

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