
TRYBER.ME PRIVACY POLICY

For the purposes of EU Regulation 2016/679 on data protection (hereinafter referred to as "**GDPR**"), in accordance with the principle of transparency, we provide the following information to make you aware of the characteristics and methods of processing the data collected for the purposes of using this website (**Website or also Platform**) and, therefore, also of the respective online engagement on the aforementioned crowdtesting platform, Tryber.me.

All terms beginning with a capital letter refer to the definition and meaning indicated in the Terms and Conditions of the aforementioned Website.

This website collects certain Personal Data from its users (hereinafter referred to as **Users** or **Trybers**), as **Data Subjects**, for the purpose of allowing them to make full use of this website.

This document can be printed for reference using the print command in the settings of any browser.

[DATA CONTROLLER AND CONTACT DETAILS](#)

Please note that the Data Controller is: **UNGUESS S.r.l.**, an Italian company with registered office in Via del Chiesotto n.4, Cremona, VAT number and tax code 01603290196.

The contact email addresses are as follows:

- **Tryber team email:** support@tryber.me, for any support regarding the use of the website;
- **Data Controller email:** info@unguess.io, for any communication or request regarding the processing of your Personal Data;
- **Email address of the DPO** [Data Protection Officer]: legal@unguess.io, to request specific assistance regarding the processing of your personal data and the exercise of your rights as a data subject.

PURPOSE AND LEGAL BASIS OF THE PROCESSING

UNGUESS, through the Tryber.me platform, processes the Personal Data of Trybers for various purposes related to the management of the engagement relationship and participation in Campaigns. **Each purpose is associated with the most appropriate legal basis, as provided for in Article 6 of Regulation (EU) 2016/679 ("GDPR").**

In particular, Personal Data will be processed for the following purposes:

- **Registration on the [Tryber.me](https://tryber.me) platform:** To allow the User to register as a Tryber and access the services offered by the platform. *LEGAL BASIS:* **consent** of the data subject (Article 6(1)(a) GDPR).
- **Profiling of the Tryber in the community:** To personalize the experience on the platform and improve the selection of Campaigns based on the characteristics of the Tryber. *LEGAL BASIS:* **consent** of the data subject (Article 6, paragraph 1, letter a) GDPR). Profiling does not produce legal effects or significantly affect the data subject.
- **Preselection of Trybers for Campaigns:** To assess the suitability of Trybers to participate in specific Campaigns, based on the information provided during the application process. *LEGAL BASIS:* **implementation of pre-contractual measures** taken at the request of the data subject (Art. 6, para. 1, letter b) GDPR).
- **Participation in the Campaign and management of the engagement relationship:** To manage the activities provided for in the Campaign, including operational communications, execution of activities, management of compensation, and contractual obligations. *Legal basis:* **performance of the engagement contract** (Art. 6, par. 1, letter b) GDPR), finalized through acceptance of the contractual documents available on the platform.

Furthermore, only in relation to the actual execution of the specific Activities covered by the commissioned Campaign, **Trybers will be required to give additional consent**, in addition to that given by accepting this

Privacy Policy and the subsequent contractual documents accepted on the Tryber.me website, **only in the event that one of the following circumstances arises:**

- a)** additional Personal Data is processed for the purposes of the Campaign, for which consent has not been requested on the Platform, either through this Privacy Policy or through the subsequent contractual documents accepted on Tryber.me (Engagement Offer, Test Manual);
- b)** Personal Data is processed by an independent Data Controller for the purposes of participating in the Campaign;

Finally, **in general**, the User's Personal Data is collected to allow the Data Controller to:

- provide its Service;
- comply with legal obligations;
- respond to requests or enforcement actions;
- protect its rights and interests (or those of Users or third parties);
- identify any malicious or fraudulent activities;
- compile statistics; allow access to third-party service accounts;
- enable registration and authentication provided directly by this Site; • manage contacts and send messages;
- enable interaction with data collection platforms and other third parties;
- display content from external platforms;
- manage tags and monitor the website.

TYPE OF PERSONAL DATA SUBJECT TO PROCESSING

UNGUESS, through the Tryber.me platform, processes only personal data that is necessary and relevant to the purposes indicated in this policy, in accordance with the principle of minimization referred to in Article 5, paragraph 1, letter c) of the GDPR.

The categories of personal data processed include:

1. Identification data

- First and last name
- Date of birth
- Gender
- Tax code/VAT number

- ID card number
- Profile picture

2. Contact details

- Email
- Physical address (if required for contractual or tax purposes)
- Preferred language
- Country and city of residence

3. Professional and community data

- Occupation and skills
- Stated experiences and interests
- Information provided voluntarily for profiling and pre-selection for campaigns

4. Economic and financial data

- Bank details (IBAN)
- Data relating to income or assets (only if required for specific Campaigns or tax compliance)

5. Technical and browsing data

- Platform usage data (access logs, interactions)
- Cookies and similar technologies
- Online browsing data
- Location data (only if voluntarily activated)

6. Multimedia and biometric data (only if provided voluntarily)

- Image and voice (e.g., recordings, audio/video contributions)
- Physical characteristics, daily habits, and lifestyle (only if relevant to specific Campaigns and with explicit consent)

All data is collected and processed exclusively for the purposes indicated in the section "Purposes and legal basis of processing" and will not be used for additional or incompatible purposes. UNGUESS guarantees that unnecessary data will be excluded or anonymized.

Personal Data may be freely provided by the Tryber or, in the case of Usage Data, collected automatically during the use of this website.

Unless otherwise specified, all Data requested by this website is mandatory, and failure to provide such Data may make it impossible for this Platform to provide its services. In cases where the website expressly

indicates that certain Data is not mandatory, Users are free not to communicate such Data without any consequences on the availability or functioning of the Service.

Users who have doubts about which Personal Data is mandatory are invited to contact the Data Controller.

Any use of Cookies – or other tracking tools – by this Website or by the owners of third-party services used by this Website is for the purpose of providing the service requested by Tryber. For a complete consultation **of the respective Cookies Policy on the Platform, you can view the document at this link:** <https://www.tryber.me/it/legal/cookie-policy>

Users are responsible for the Personal Data of third parties obtained, published, or shared through this Website.

METHOD OF PROCESSING

The Data Controller takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

Data processing is carried out using computers and/or IT tools, following organizational procedures and methods strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the following may have access to the Data:

- **other parties involved in the organization** of this Website and UNGUESS (administrative, commercial, marketing, legal personnel, system administrators)
 - administrative, commercial, marketing, legal, system administrators)
- **external parties** (such as third parties) providing technical services, postal couriers, hosting providers, IT companies, communication agencies, customers, partners, collaborators) **appointed, if necessary, as Data Processors by the Data Controller, or in any case as independent Data Controllers and only in this case, separate supplementary consent must be given** (see paragraph "*Purposes and legal basis of the processing*").

The updated list of these subjects may be requested from the Data Controller at any time.

The Data is processed at the Data Controller's operational headquarters and in any other place where the parties involved in the processing are located. Under no circumstances will the personal data covered by this Privacy Policy be disclosed to unspecified parties. Your data is stored at UNGUESS's offices and on servers located in the European Union. Depending on the Tryber's location, data transfers may involve the transfer of their Data to a country other than their own, recognized as adequate in terms of security pursuant to Articles 45-46 of the GDPR.

To learn more about where the transferred Data is processed, Trybers may request detailed information from the Data Controller at any time. UNGUESS also uses cloud services provided by companies in third countries recognized as adequate in terms of security pursuant to Articles 45-46 of the GDPR.

Unless otherwise specified in this document, Personal Data will be processed and stored for the time required for the purposes for which it was collected and may be stored for a longer period in accordance with applicable legal obligations or based on the consent of Trybers.

FACEBOOK AND LINKEDIN PERMISSIONS REQUIRED BY THIS WEBSITE

This Website may request certain permissions from Facebook and LinkedIn to connect with the Tryber's account and retrieve information, including Personal Data, in order to facilitate registration, profiling, and participation in Campaigns.

The processing of data obtained through such permits takes place exclusively with **the explicit consent** of the data subject, pursuant to Article 6, paragraph 1, letter a) of the GDPR.

The purposes and data processed for each permission are as follows:

- **Basic information** (ID, name, image, gender, language, connections) - *Purpose:* creation and management of the Tryber profile on the platform - *Legal basis:* consent
- **Date of birth** - *Purpose:* verification of the minimum age for access to the platform and selection for specific Campaigns - *Legal basis:* consent
- **Primary email address** - *Purpose:* operational communications and invitations to Campaigns - *Legal basis:* consent

For more information on permissions and data processing by social networks, please refer to their respective privacy policies:

- [Facebook Privacy Policy](#)
- [LinkedIn Privacy Policy](#)

FURTHER INFORMATION ON STORAGE TIME

Unless otherwise specified in this document, UNGUESS S.r.l. processes and stores Trybers' Personal Data for the time strictly necessary to achieve the purposes for which it was collected, in accordance with the principle of storage limitation provided for in Article 5, paragraph 1, letter e) of the GDPR.

In particular:

1. Personal data processed for contractual purposes

Personal Data collected for the performance of the engagement contract between UNGUESS and the Tryber (e.g., identification, contact, tax, banking, and activity-related data) will be retained for the entire duration of the contractual relationship and, subsequently, for a maximum period of **10 years** from the termination of the contract, in accordance with legal obligations in tax, accounting, and civil matters.

Legal basis: performance of the contract (Art. 6, para. 1, letter b) GDPR). *Purpose:* management of the engagement relationship, payment of fees, tax and legal compliance

2. Personal data processed for profiling and selection purposes

Personal Data voluntarily provided by the Tryber for profiling within the community and selection for future Campaigns (e.g., skills, interests, experience, browsing data) will be retained for as long as the Tryber is registered on the Tryber.me platform and in any case for a maximum period of **24 months** from the last significant interaction, unless consent is revoked.

Legal basis: consent (Art. 6, para. 1, letter a) GDPR). *Purpose:* personalization of the experience, pre-selection for Campaigns, improvement of services

3. Data processed for legitimate interest

Personal Data processed on the basis of the legitimate interest of the Data Controller (e.g., platform security, abuse prevention, technical improvement) will be stored for the period strictly necessary to pursue these purposes, and in any case for no longer than **12 months**.

Legal basis: legitimate interest (Art. 6, para. 1, letter f) GDPR). *Purpose:* security, monitoring, technical optimization

4. Retention for legal obligations or explicit consent

- In the event of legal obligations or orders from competent authorities, Personal Data may be stored for a longer period, in accordance with applicable regulations.
- If Tryber has given **explicit consent** to storage for additional purposes, the data will be stored until consent is revoked.

Once the retention period has expired, Personal Data will be deleted or anonymized. After this expiry date, it will no longer be possible to exercise the rights of access, rectification, erasure, or data portability.

[USERS' RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION \(GDPR\) AND](#)

THE EXERCISE OF THESE RIGHTS

Trybers, as Data Subjects, may exercise certain rights with regard to the Data processed by the Data Controller.

In particular, Trybers have the right to do the following, within the limits permitted by law:

- **Withdraw their consent at any time.** Trybers have the right to withdraw their consent if they have previously given their consent to the processing of their personal data.
- **Object to the processing of their Data.** Trybers have the right to object to the processing of their Data if the processing is based on a legal basis other than consent.
- **Access their data.** Trybers have the right to know whether their Data is being processed by the Data Controller, to obtain information on certain aspects of the processing, and to obtain a copy of the Data being processed.
- **Verify and request rectification.** Trybers have the right to verify the accuracy of their Data and request that it be updated or rectified.
- **Restrict the processing of their Data.** Trybers have the right to restrict the processing of their Data. In this case, the Data Controller will not process the Data for any purpose other than storage.
- **Have their personal data deleted or otherwise removed.** Trybers have the right to obtain the deletion of their Data from the Data Controller.
- **Receive your Data and have it transferred to another controller.** Trybers have the right to receive their Data in a structured, commonly used, and machine-readable format and, where technically feasible, to have it transmitted to another controller without hindrance.
- **Lodge a complaint.** Trybers have the right to lodge a complaint with the competent data protection authority.

Trybers also have the right to know the legal basis for Data transfers abroad, including any international organization governed by public international law or established by two or more countries, such as the UN, and the security measures taken by the Data Controller to safeguard their data.

When Personal Data is processed in the public interest, in the exercise of public powers vested in the Data Controller, or to pursue a legitimate interest of the Data Controller, Trybers may object to such processing on grounds relating to their particular situation, justifying their opposition.

Trybers are advised that, if their Personal Data is processed for direct marketing purposes,

they may object to the processing at any time, free of charge and without providing any justification. If the User objects to processing for direct marketing purposes, Personal Data will no longer be processed for such purposes. To find out whether the Data Controller processes data for direct marketing purposes, Trybers may refer to the relevant sections of this document.

Any requests to exercise User rights may be addressed to the Data Controller using the contact details

provided in this document. Such requests are free of charge and will be answered by the Data Controller as soon as possible and always within one month, providing Trybers with the information required by law. Any corrections or deletions of Personal Data or limitations on processing will be communicated by the Data Controller to each recipient to whom the Personal Data has been disclosed, unless this proves impossible or involves a disproportionate effort. At the request of Trybers, the Data Controller will inform them about such recipients.

In accordance with current legislation on the protection of personal data, the data subject has the right to lodge a complaint with the Data Protection Authority if they believe that the processing of their data has violated Regulation (EU) 2016/679 (GDPR).

The Data Protection Authority can be contacted at the following addresses:

Italian Data Protection Authority Piazza Venezia n. 11 – 00187 Rome Fax: (+39) 06.69677.3785 Certified email: protocollo@pec.gdpd.it (only from certified email addresses)

<https://www.garanteprivacy.it/>

FURTHER INFORMATION ON DATA COLLECTION AND PROCESSING

Legal action

The User's Personal Data may be used by the Data Controller in court or in the preparatory stages of any legal proceedings for the defense against abuse in the use of this Website or related services by the User.

The User declares to be aware that the Data Controller may be required to disclose the Data upon request of public authorities.

Further information on the User's Personal Data

At the User's request, or in light of the needs identified by the Data Controller, in addition to the information contained in this Privacy Policy, the Data Controller may provide Tryber with additional and contextual information regarding the collection and processing of additional Personal Data for other specific services within the site or for additional circumstances related to the execution of the Campaign that is the subject of the online engagement.

System logs and maintenance

For operational and maintenance purposes, this Website and any third-party services may collect files that record interaction with the Platform itself (system logs) or use other Personal Data (such as the IP address) for this purpose.

Information not contained in this policy

Further details regarding the collection or processing of Personal Data may be requested from the Data Controller at any time. Please refer to the contact information at the beginning of this document.

Changes to this privacy policy

The Data Controller reserves the right to update or modify this Privacy Policy at any time, in compliance with current legislation on the protection of personal data and in accordance with the Terms and Conditions of the Tryber.me platform.

Any changes will be communicated to Trybers by:

- Publication of the new text or changes on this page
- Sending a specific communication to the Tryber Community, containing the updated text or the changes made

Such communications will be made **at least 15 (fifteen) days before** the date of entry into force of the changes, to allow interested parties to review them and, if necessary, exercise their rights, including the right to delete their data from the platform.

The changes will apply exclusively to Campaigns published from the date of entry into force of the new Privacy Policy.

If the changes concern processing based on **the consent of the data subject** (e.g., profiling, personalized communications, access to data from social networks), the Data Controller will collect **new explicit consent**, where required. Under no circumstances will consent be considered implicit or presumed.

For any updates, Tryber may consult the most recent version of the Privacy Policy directly on the Tryber.me platform or contact the Data Controller at the addresses indicated.