Credemia Privacy Policy

EU Regulation 2016/679

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Pomiager US considers the protection of the personal data of users of the Credemia website https://credemia.com and platform https://app.credemia.com (the "Websites") to be of fundamental importance.

This Privacy Policy informs users, pursuant to Article 13 of EU Regulation 2016/679 (the "GDPR"), that personal data provided while browsing or using services offered by the Websites or applications will be processed in accordance with the principles of fairness, lawfulness, transparency, confidentiality and protection of users' rights, in full compliance with applicable personal data protection legislation.

1 Data controller

The data controller for the processing described in this policy is Pomiager US.

Pomiager US

Product: Credemia. Website: https://credemia.com. Platform: https://app.credemia.com.

EIN: 33-1891674.

Email: international@pomiager.com.

Registered office and operational headquarters: c/o Spaces, 100 S. Juniper St., 3rd Floor, Philadelphia, PA 19107, USA.

Privacy contact: Giuseppe Adduce, CEO.

2 Types of data processed

Browsing data

During normal operation, the IT systems and software procedures used to operate the Website acquire certain personal data whose transmission is implicit in the use of Internet communication protocols. These include the Internet domain and IP protocol, the browser and operating system used, the date, time and duration of visits, pages viewed and any search engine through which the user reached the Website. This information is not collected to be associated with identified individuals. However, by its nature, processing and association with data held by third parties could make it possible to identify users.

This category includes IP addresses or domain names of computers used to connect to the Website, Uniform Resource Identifier (URI) addresses of requested resources, the time of requests, the method used to submit requests to the server, the size of returned files, the numerical code indicating the server's response status (success, error, etc.) and other parameters relating to the user's operating system and IT environment. These data are used solely to obtain anonymous statistical information about use of the Website and are deleted immediately after processing, without prejudice to any need to establish civil or criminal liability.

Personal data provided by users on the Websites and in applications

To use the services, Websites or applications of Pomiager US, users will be asked to enter identifying personal data and contact details, as further specified in the following section.

3 Methods purposes and legal basis of processing

Users' personal data will be processed by personnel expressly authorised and appointed by the controller, using electronic, telematic or paper-based tools. Appropriate technical and organisational security measures are applied pursuant to Article 32 of the GDPR to reduce the risk of destruction, loss, unauthorised access or processing that is unlawful or inconsistent with the purposes for which the data were collected.

Pomiager US will process data for the period strictly necessary to achieve the relevant processing purposes, as follows.

Requests for information or quotations

Personal data processed: the user's identification data.

Legal basis: steps taken before entering into a contract, under Article 6(1)(b) of the GDPR.

Provision of data: failure to provide data, or provision of inaccurate data, may make it impossible to respond to the user's request.

Processing period: proportionate to achieving the purposes underlying the processing.

Access to platforms and use of services

Personal data processed: the user's identification data.

Legal basis: performance of a contract, under Article 6(1)(b) of the GDPR.

Provision of data: failure to provide data, or provision of inaccurate data, may prevent access to the applications or use of the related services.

Processing period: proportionate to achieving the purposes underlying the processing.

Newsletter subscription

Personal data processed: the user's identification data.

Legal basis: the data subject's consent, under Article 6(1)(a) of the GDPR.

Provision of data: failure to provide data, or provision of inaccurate data, may prevent subscription to the newsletter.

Processing period: until the user withdraws consent. Users may withdraw previously given consent at any time by using the unsubscribe procedure in newsletter emails or by contacting the controller.

Job applications and unsolicited applications

Personal data processed: the user's identification data and the data contained in their curriculum vitae.

Legal basis: the data subject's consent, under Article 6(1)(a) of the GDPR.

Provision of data: failure to provide data, or provision of inaccurate data, may adversely affect the application selection process.

Processing period: users' data will be deleted 12 months after the application is submitted.

4 Disclosure of data

Personal data provided by users may be disclosed to public bodies, institutions or professionals legally entitled to request them. Solely for the purposes described in Section 3, data may also be disclosed to third-party companies or professionals engaged by Pomiager US in conducting their business, including, by way of example, accounting and tax advisers, legal advisers and sector specialists.

Where these third parties do not act as independent controllers, they act as processors under Article 28 of the GDPR and are required by a specific contractual agreement to observe security standards for the processing of the data disclosed to them. The list of third parties is available upon express request to the controller using the contact details at the end of this Privacy Policy. In any event, users' personal data will not be publicly disseminated or transferred to third countries outside the EU.

5 Cookies

For information about the cookies used by the Websites, please refer to the Cookie Policy.

6 Rights of data subjects

Under Articles 15 et seq. of the GDPR, users may exercise the following rights against the controller at any time:

- Right of access: to access their personal data and obtain a copy.
- Right to rectification: to have inaccurate personal data corrected or incomplete data completed.
- Right to erasure: to have personal data erased in the circumstances described in Article 17 of the GDPR.
- Right to restriction of processing: to obtain restriction of processing in the circumstances described in Article 18 of the GDPR.
- Right to data portability: to receive their personal data in a structured, commonly used and machine-readable format and request their transmission to another controller.
- Right to object: to object at any time, on grounds relating to their particular situation, to processing based on Article 6(1)(e) or (f) of the GDPR, and to object to processing for direct marketing purposes.
- Right to lodge a complaint: to lodge a complaint with the Italian Data Protection Authority under Article 77 of the GDPR.

To exercise rights under Articles 15 et seq. of the GDPR or obtain further information about this Privacy Policy, users may contact Pomiager US at international@pomiager.com.

It may be necessary to verify the data subject's identity before providing or changing information.

7 Information about this Privacy Policy

This Privacy Policy was updated on 26 June 2026. The controller reserves the right to amend or update this document and therefore invites users to review this webpage periodically. Pomiager US is not responsible for the content or services provided by third-party websites accessible through links on the Website.