

PRIVACY INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA
PURSUANT TO REGULATION (EU) 2016/679 ("GDPR")

With reference to the processing of personal data provided by you under the contract signed with Gewiss S.p.A, the latter wishes to provide you, as the data subject, (the "**Data Subject**"), with the following information pursuant to Article 13 of Regulation (EU) 2016/679 ("**GDPR**").

1. DATA CONTROLLER

The Data Controller is Gewiss S.p.A. (il "**Data Controller**"), fiscal code and VAT number 00385040167, with registered office in Via Domenico Bosatelli, 1 - 24069 Cenate Sotto BG – Italy, email address: privacy@gewiss.com. The Data Controller, as part of its organisational structure, appoints the Authorised Persons for the processing of personal data, assigning them specific tasks and roles by means of a specific deed of appointment.

2. DATA PROTECTION OFFICER

The Data Controller has appointed a **Data Protection Officer (DPO)** pursuant to Articles 37 - 39 GDPR. If necessary, the DPO may be contacted at the following email address: dpo@pec.gewiss.com.

3. CATEGORIES OF PERSONAL DATA PROCESSED

The personal data ("**Data**") being processed are "Common Data", as specified in detail below:

- Forename and surname, general information and contact details (telephone number and email address).

4. PURPOSE OF PROCESSING AND LEGAL BASIS

The Data processing is carried out on the basis of the following purpose:

4.1 So called "Data processing", as per App definition:

- a) Installation of a mobile application "Gewiss Passion" (l' "**App**" o "GEWISS PASSION") and registration to take advantage of the functionalities, initiatives and services provided through the App.

Legal Bases: execution of a contract to which the data subject is party pursuant to art. 6, par. 1 letter b) GDPR;

4.2 So called "Data profiling", as per App definition:

- b) Marketing purpose: by way of example, sending - by automated means of contact (such as sms, e-mail, social account) and traditional (such as phone calls with operator and traditional mail) - promotional and commercial communications relating to services/products offered by the Company or invitation to/report corporate events or to participation/sponsorship/co-marketing company, as well as carrying out market studies and statistical analysis; sending advertising services online.

Legal Bases: consent given by the Data Subject (optional and revocable at any time pursuant to art. 6, par. 1 letter a) GDPR;

- c) Profiling purpose: analysis of your preferences, habits, behaviours or interests in order to send you personalised commercial communications.

Legal Bases: consent given by the Data Subject (optional and revocable at any time pursuant to art. 6, par. 1 letter a) GDPR;

- d) Marketing purposes of third parties: communication/transfer of your data to third parties for commercial and marketing purposes of the latter.

Legal Bases: consent given by the Data Subject (optional and revocable at any time pursuant to art. 6, par. 1 letter a) GDPR;

4.3 Applicable to both processings:

- e) To fulfil obligations under applicable national and supranational regulations and legislation.

Legal Bases: need to comply with a legal obligation to which the Data Controller is subject pursuant to art. 6, par. 1 letter c) GDPR.

5. METHODS OF PROCESSING DATA

The Data will be processed by the Data Controller both in paper and digital form. The Data Controller may carry out operations of collection, registration, organisation, storage, consultation, processing, modification, extraction, comparison, use, interconnection, communication, erasure and destruction and any other appropriate operation in

compliance with the provisions of the law necessary to guarantee the confidentiality and security of the Data as well as their accuracy, up-to-dateness and relevance to the stated purposes.

6. DATA STORAGE PERIOD

The Data will be stored according to the specific purposes for which they are processed, in particular

- a) Purposes related to the use of the App: the data will be stored for the duration of the contractual relationship and in any case for 10 years after the date of termination of the contract or after the account cancellation request;
- b) Marketing purpose, the data will be stored until the withdrawal of the consent given and in any case for a period not exceeding 24 months;
- c) Profiling purpose, the data will be stored until the withdrawal of the consent given and in any case for a period not exceeding 12 months;
- d) Marketing purposes of third parties, the data will be stored until the withdrawal of the consent given and in any case for a period not exceeding 24 months;
- e) Fulfilment of obligations under regulations and national and supranational applicable as per lett e) data will be kept for the duration of the contractual relationship and in any case for 10 years from the date of termination of the contract or after the account cancellation request.

Note: *if, in the event of litigation, it is necessary to ascertain, exercise or defend the rights of the Data Controller, the retention period of the Data collected, for the above purposes, may be extended due to the possibility that it may be necessary to prepare defensive elements in that time frame.*

In that case, the retention of said Data will take place exclusively until the conclusion of the litigation.

After the above-mentioned retention terms have expired, Data will be destroyed, deleted or made anonymous.

7. NATURE OF THE PROVISION OF PERSONAL DATA

For purposes relating to point a), the provision of Data is necessary to enjoy the services.

For purposes relating to points b), c) e d), the provision of Data is entirely optional: the processing will be carried out by the Data Controller only with its express and unequivocal consent, without prejudice to your right to revoke the consent given at any time.

For purposes relating to point e), the provision of Data is necessary to fulfil obligation under regulation applicable.

8. CATEGORIES OF RECIPIENTS OF THE DATA

The Data collected by the Data Controller, within the scope of the above-mentioned purposes, may be communicated to one or more of the categories of subjects appointed as Data Processors as indicated in detail below, such as, for example:

- External companies offering email services;
- External companies offering App maintenance services;
- External companies that offer support in carrying out market studies;
- External companies offering marketing and telemarketing services
- External business partners in sales, co-marketing or event organisation;
- Commercial agencies;
- Professionals;
- Companies belonging to the Gewiss Group.

The Data may be communicated to external subjects acting as autonomous Data Controllers, for example authorities and supervisory and control bodies, other companies in the Gewiss Group and, in general, subjects, either public or private, entitled to request the Data.

A complete and up-to-date list of Autonomous Data Controllers, Data Processors and Data Recipients in any capacity (pursuant to art. 4, no. 9, of the GDPR), can be obtained from the Data Controller's offices or by writing to the email address dpo@pec.gewiss.com.

9. TRANSFER OF DATA OUTSIDE THE EEA

The Data will be processed within the European Economic Area (EEA). If, for technical and/or operational reasons, it is necessary to use parties located outside the EEA, the processing of the data will be regulated in accordance with the GDPR, therefore, all necessary precautions will be taken in order to ensure the protection of the Data, pursuant to Article 46 of the GDPR.

10. RIGHTS OF DATA SUBJECTS

The Data Subject, in relation to the Personal Data provided, has the right to exercise at any time and in accordance with the provisions of the GDPR the rights established by the latter and shown below:

- Right to withdraw consent (art. 7, paragraph 3, GDPR): the right to revoke consent without prejudice to the lawfulness of processing based on consent granted before revocation.
- Data subject's right of access (art. 15 GDPR): the right to obtain confirmation of the existence or otherwise of one's personal data, and a copy thereof in intelligible form.
- Right to correction (art. 16 GDPR): the right to correct inaccurate personal data.
- Right to erasure, the "right to be forgotten" (art. 17 GDPR): the right to the erasure of one's personal data.
- Right to the limitation of processing (art. 18 GDPR): the right to obtain the limitation of the processing of one's own data, e.g., if the accuracy of the data is disputed or in the case of unlawful processing.
- Right to data portability (art. 20 GDPR): the right to receive in a structured, commonly used and machine-readable format one's own personal data provided to the Controller and the right to transmit said data to another Controller if the processing is carried out on the basis of consent or a contract and by automated means.
- Right to object (art. 21 GDPR): the right to object to the processing of one's personal data.
- Right not to be subject to automated decision-making (art. 22 GDPR): the right not to be subject to a decision based solely on automated processing.

Data Subjects may assert their rights as set out in the GDPR by contacting the Controller directly at the following email address: privacy@gewiss.com.

11. RIGHT TO LODGE A COMPLAINT (ART. 77 OF THE EU REGULATION)

If the data subject considers that their rights have been compromised or infringed, or that the processing of their Data is contrary to applicable law, they have the right to lodge a complaint with the competent Data Protection Authority.