

CANOSSA APP PRIVACY POLICY

Subject: Privacy notice relating to the processing of your personal details pursuant to Art. 13 of EU Reg 2016/679

Pursuant to the effects of Italian Legislative Decree n.196 dated 30th June 2003 known as the Personal Data Protection Code (hereinafter the "Code") and EU Regulation 2016/679 on Data Protection, please take note that your personal details will be processed by the Data Processing Controller as specified below.

For the sake of clarity, please take note of the meaning of the following terms:

Processing: any operation or set of operations, handled with or without the use of automated processes and applied to personal details or sets of personal details, such as the gathering, recording, organisation, structuring, storing, adaptation or modification, extraction, consulting, use, communication by means of transmission, publication or any other form of provision, comparison or interconnection, limitation, deletion or destruction.

Personal details: any information concerning an identified or identifiable physical person («the interested party»); a physical person is considered identifiable if they can be identified, directly or indirectly, with particular reference to an identifier such as a name, identification number, details relating to the location, an on-line identity or one or more elements that are characteristic of their physical, physiological, genetic, psychological, economic, cultural or social identity.

ACCEPTANCE OF THIS PRIVACY NOTICE

Please read this privacy notice with due care. By downloading our APP and giving your express consent where necessary, you implicitly agree to the terms of this privacy policy.

1. IDENTITY AND CONTACT DETAILS OF THE CO-CONTROLLERS OF DATA PROCESSING (hereinafter also referred to as 'Controller') and of the DATA PROTECTION OFFICER - DPO

CONTROLLER

Company Name: CANOSSA EVENTS SRL

Address: Via Filippo Turati 28 - Loc. Roncolo 42020 Quattro Castella (RE) Italy

FISCAL ID / VAT NUMBER: IT02431580352

TEL. + 39 (0)522 421096

E-mail: info@canossa.com

CO-CONTROLLER

Company Name: CANOSSA LIFESTYLE SRL

Address: Via Filippo Turati 28 - Loc. Roncolo 42020 Quattro Castella (RE) Italy

FISCAL ID / VAT NUMBER: IT02916740356

TEL. + 39 (0)522 421096

E-mail: info@canossa.com

CO-CONTROLLER

Company Name: CANOSSA RACING SRL

Address: Via Filippo Turati 28 - Loc. Roncolo 42020 Quattro Castella (RE) Italy

FISCAL ID / VAT NUMBER: IT02945870356

TEL. + 39 (0)522 421096

E-mail: info@canossa.com

DPO CANOSSA EVENTS SRL

E-Mail: dpo@ambientelavorosalute.com

Canossa Group as Data Processing Co-Controllers, where said co-control is based on the sharing of personal details and the purposes for processing, in compliance with the provisions in Article 13 of EU Regulation 679/2016, hereby informs you that your personal details may be used by each of the data processing co-controllers in accordance with the provisions of said Regulation and according to their respective purposes, in the manner as indicated below with regard to the addressee of the privacy notice.

PARTIES AFFECTED BY THE PROCESSING OF PERSONAL DETAILS: Anyone registering on the CANOSSA APP

2. OBJECT, PURPOSE AND LEGAL GROUNDS FOR DATA PROCESSING

a. Purpose and Object: Registration on the APP and provision of services

How personal details are collected: Submission of the completed app registration form

Type of data: personal details collected by the app relating to: name, surname, e-mail, mobile phone, gender, interests, address, city, postcode, place and date of birth. Technical data is also acquired as a result of using the App (in particular, information about the device used). Said data will be used in order to execute all activities instrumental or required for the provision of the services offered via the App.

Legal basis for data processing (lawfulness): Said data processing falls under legally allowed processing pursuant to art. 6 comma 1 letter B of EU Regulation 2016/679 relating to Data Protection

Categories that may be privy to your personal details – Recipients:-

Your Personal Details may be made accessible for the above-mentioned purposes or in order to fulfil legal obligations or to undertake operations instrumental to the above-mentioned purposes, to:

- employees of the Controller, who have been specifically appointed and authorised, also as data protection officers, for specific data processing;
- third-party companies or other third parties providing outsourced services to the Controller, in their capacity as external data protection officers, specifically appointed and authorised for specific data processing.

The agreements signed with the above companies are stipulated for essential processing only and guarantee the confidentiality, security and integrity of data.

Categories of Outsourced Data Protection Officers that may be appointed:

- Persons or companies providing technical, organisational, professional, operational services to the Controller useful for achieving the stated purposes.

- Persons or companies providing IT or legal services to the Controller useful for achieving the stated purposes.

Personal Details may be transferred to Independent Data Controllers, including Public Regulatory Authorities or Supervisory Bodies

Refusal to allow Data Processing: refusing to provide your personal details or objecting to data processing, in particular as regards compulsory data (identified with an * next to the item) is the right of the person affected by data processing, but will make it impossible to register on the APP.

You may confirm said refusal using the contact details at point 1

Under no circumstances will data collected be made public or used for any other purpose.

- b. **Purpose and Subject: Soft marketing.** The e-mail you provided will be processed for soft marketing operations, such as advertising and promoting services similar to those in which you expressed an interest by using one of our specific products/services. This is only and exclusively in the mutual and legitimate interest of both parties. Such operations will make use of e-mail and the frequency of contact will be low.

How personal details are collected: submission of the completed app registration form

Type of data: e-mail address

Legal basis for data processing (lawfulness): Said data processing falls under legally allowed processing pursuant to article 130 paragraph 4 of Legislative Decree 196 dated 30th June 2003 "Personal Data Protection Code", along with the amendments introduced by Legislative Decree 101 dated 10th August 2018

Categories that may be privy to your personal details – Recipients:-

Your Personal Details may be made accessible for the above-mentioned purposes or in order to fulfil legal obligations or to undertake operations instrumental to the above-mentioned purposes, to:

- employees of the Controller, who have been specifically appointed and authorised, also as data protection officers, for specific data processing;
- third-party companies or other third parties providing outsourced services to the Controller, in their capacity as external data protection officers, specifically appointed and authorised for specific data processing.

The agreements signed with the above companies are stipulated for essential processing only and guarantee the confidentiality, security and integrity of data.

Categories of Outsourced Data Protection Officers that may be appointed:

- Persons or companies providing technical, organisational, professional, operational services to the Controller useful for achieving the stated purposes.

- Persons or companies providing IT or legal services to the Controller useful for achieving the stated purposes.

- Persons who perform commercial and marketing services on behalf of the Controller in compliance with the limits and constraints set out in the preceding paragraphs.

Personal Details may be transferred to Independent Data Controllers, including Public Regulatory Authorities or Supervisory Bodies

Refusal to allow Data Processing: The interested party may object to said data processing at any time by sending written notification to the e-mail address of the data controller as stated in paragraph 1, or by following the instructions indicated in each e-mail notification (Opt-out). The right to withdraw your consent at any time bears no implications on the legality of any data processing prior to said withdrawal.

You may confirm said refusal using the contact details at point 1

Under no circumstances will data collected be made public or used for any other purpose.

- c. **Purpose and Object: Third-party marketing** for companies belonging to or associated with Canossa Group. Contact details will be processed for the purposes of advertising and promoting products or services offered by companies associated with or part of Canossa Group.

How personal details are collected: submission of the completed app registration form

Categories of data processed and legal basis: Name and surname, phone number, company name and other identity numbers, e-mail of the interested person affected by data processing. Said data processing falls under legally allowed processing pursuant to art. 6 comma 1 letter A of EU Regulation 2016/679 relating to Data Protection.

The interested party must CONSENT to the processing of their personal details for the specific purpose.

Categories that may be privy to your personal details – Recipients-:

Your Personal Details may be made accessible for the above-mentioned purposes or in order to fulfil legal obligations or to undertake operations instrumental to the above-mentioned purposes, to:

- employees of the companies associated with or part of Canossa Group, who have been specifically appointed and authorised, also as data protection officers, for specific data processing;
- third-party companies or other third parties providing outsourced services to the companies associated with or part of Canossa Group, in their capacity as external data protection officers, specifically appointed and authorised for specific data processing.

The agreements signed with the above companies are stipulated for essential processing only and guarantee the confidentiality, security and integrity of data.

Categories of Outsourced Data Protection Officers that may be appointed:

- Persons or companies providing technical, organisational, professional, operational services to the Controller useful for achieving the stated purposes.

- Persons or companies providing IT or legal services to the Controller useful for achieving the stated purposes.

The agreements signed with the above companies are stipulated for essential processing only and to guarantee the confidentiality, security and integrity of data.

Personal Details may be transferred to Independent Data Controllers, including Public Regulatory Authorities or Supervisory Bodies.

Refusal to allow Data Processing: Refusal to provide your personal details or to authorise their processing, which is the acknowledged right of the interested person affected by data processing, has no implications on the possibility to take part/register in the event.

You may confirm said refusal using the contact details at point 1

Under no circumstances will data collected be made public or used for any other purpose.

3. DURATION OF THE PROCESSING OF PERSONAL DETAILS

Data is stored for 10 years after the termination of the relationship or, in the event of changes to legislation or case law, for as long as the retention of said data is necessary in order to enforce a right of either party.

Data is checked for obsolescence on a regular basis.

4. TOOLS AND LOGIC FOR THE PROCESSING OF PERSONAL DETAILS

As regards the purposes specified above, data processing makes use of manual, computerised and telematic tools with logic that is strictly related to the above purposes and, in any case, in such a way as to guarantee the security and confidentiality of the personal details themselves.

5. RIGHTS OF THE INTERESTED PARTY

The interested party may exercise their rights as mentioned below by writing to the data controller at the contact details given at the beginning of the document, paragraph 1

- Right to ask the data controller for access to your personal details
- Right to ask the data controller to correct / delete / all or part of your personal details
- Right to notify the data controller that you object to the processing of your personal data
- Right to receive the full list of data protection officers
- Right to receive your personal details stored in a structured format that is in common use and readable
- Right to file a complaint with a supervisory authority such as the Guarantor for Privacy at the contact details given below <https://www.garanteprivacy.it/home/footer/contatti>

There is no automated decision-making process, including profiling according to article 22, paragraphs 1 and 4 of European Privacy Regulation 2016/679

6. TRANSFER OF DATA ABROAD

Your Personal Details will be processed either within the European Union and stored on servers located within the European Union, or may be processed and stored in countries outside the European Union when an adequate level of protection is guaranteed. This level will be considered as adequate where there is a specific decision pertaining to its adequacy issued by the European Commission in relation to the recipient country, or where adequate contractual guarantees or covenants are provided by the Data Controllers and Data Protection Officers located abroad, including standard contractual data protection clauses (Art. 46, paragraphs 2(c) and (d) of EU Data Protection Regulation 2016/679). *With regard to Group Companies based outside the European Union, the transfer of data abroad is based on an adequacy decision (Art. 45 of EU Data Protection Regulation 2016/679) by means of specific contractual agreements. Consent will be noted in a specific logbook.*

The above is solely with respect to confidentiality and the purposes described above, and said guarantees are available for consultation at the Data Controller's premises or may be provided by e-mail. You may request said information by writing to the contact details at point 1

This notice is subject to change and amendment; the latest version should be checked on a routine basis. Should updates to the privacy notice have a significant impact on your operations, we will notify you of said changes before they take effect.