INTRED S.P.A., with registered office in Via P. TAMBURINI, 1 – 25136 BRESCIA, Tax Code / VAT No. 1171702010157 (hereinafter, the "Controller"), in its capacity as data controller, hereby informs you, in compliance with the obligations arising from national legislation (Legislative Decree No. 196 of 30 June 2003, Personal Data Protection Code) and EU legislation (European Regulation on the protection of personal data No. 679/2016, GDPR), as amended, of the methods of management of the website and of the web platforms with regard to the processing of personal data. INTRED S.P.A. considers it its duty to ensure that those who visit its websites (www.intred.it) feel protected both while simply browsing and if they choose to communicate information and their personal data in order to use specific features and/or services. For these reasons, visitors are invited to read this notice carefully before transmitting/communicating any type of personal data and/or filling in the electronic forms on the website. In particular, this document will inform you about:

- THE SUBJECT OF THE PROCESSING
- THE PURPOSE OF THE PROCESSING
- THE METHODS OF THE PROCESSING
- THE RETENTION OF DATA
- ACCESS TO DATA
- THE COMMUNICATION OF DATA
- THE TRANSFER OF DATA
- THE TRANSFER OF DATA
- THE METHODS FOR EXERCISING RIGHTS
- THE CONTROLLER, THE PROCESSORS AND THE DPO

1. Subject of the processing

What data are used?

The Controller processes:

- personal, identifying and non-sensitive data, in particular first name, surname, tax code, VAT number, email or PEC email address, telephone and fax number, residence, domicile, the data necessary for the provision of the services within the portal itself, including browsing data, as well as any other data that you provide when filling in the various forms;
- browsing data acquired by the IT systems and software procedures used to operate the websites (www.intred.it). This is information that is not collected in order to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment;

- data relating to your preferences and interests, in particular: the content used, the use of the services, the features used, connection times, traffic data, browsing data on websites and social profiles of the Controller or of business partners or third parties, the IP address, the devices and the connectivity used. These data may also be collected by means of cookies and metadata;
- Data provided voluntarily by the user
- In order to access certain services/features or submit requests, visitors may send INTRED SPA their personal data (e.g. their email address). These data will be processed by the controller solely to enable the use of the services/features concerned and to handle the requests, for the time technically necessary for these purposes. Where such data are collected for other purposes, this will be indicated each time in specific notices and, where necessary, consent to the processing will be requested.

2. Purpose of the processing

Your personal data will be processed:

a) without your consent (Article 6, letters b, c, f, GDPR), for the following purposes:

- to perform a service or one or more contractually agreed operations, with particular reference to registration on the website (www.intred.it) and the related use of the services;
- the fulfilment of fiscal or tax obligations;
- to be able to contact you again, using the contact details you have provided, in order to handle any requests you make through the forms available on this website;
- to comply with obligations under laws and regulations (national or European), or to execute an order of judicial Authorities or of supervisory bodies;
- to exercise or defend the rights of the Controller in court;

b) with your consent (Article 7, GDPR), for the following purposes:

- promotion of INTRED SPA products and services by sending advertising, informational and promotional material and updates on initiatives and offers aimed at rewarding Customers, market research, economic and statistical analyses;
- communication to third parties so that they may send advertising, informational and promotional material relating to their own products or services

Providing the data for the purposes referred to in letter a) above is mandatory. Failure to provide the data and/or any express refusal of the processing will make it impossible for the controller to follow up on your requests or to comply with the requests of the competent Authorities.

Conversely, providing the data for the purposes referred to in letter b) is optional, with the consequence that you may decide not to give your consent, or to withdraw it at any time.

3. Methods of the processing

How are your data used?

Your personal data will be processed with or without the aid of IT systems.

The Controller undertakes to guarantee the logical and physical security of the data and, in general, the confidentiality of the personal data processed, implementing all the necessary technical and organisational measures appropriate to guarantee their security.

4. Retention of data

How long are your data retained?

Your data are in fact accessible to:

- employees and/or contractors of the controller or of the companies
- subsidiaries and/or investee and/or associated and/or affiliated companies that contribute to creating, maintaining and improving all the services of the controller, in their capacity as persons in charge of processing and/or internal processors and/or system administrators;
- Business partners and service providers carrying out outsourced activities on behalf of INTRED SPA in their capacity as external processors, carrying out activities connected with, instrumental to or supporting those of the controller, for example: management and maintenance of the content of the websites and Apps, customer support, customer care and call centre services, management of Information Technology systems, editorial services, debt collection, data processing services for invoicing, archiving of documentation relating to customer relationships, etc.

5. Access to data

Who can access your data?

Your data are in fact accessible to:

- employees and/or contractors of the controller or of the companies
- subsidiaries and/or investee and/or associated and/or affiliated companies that contribute to creating, maintaining and improving all the services of the controller, in their capacity as persons in charge of processing and/or internal processors and/or system administrators;
- Business partners and service providers carrying out outsourced activities on behalf of INTRED SPA in their capacity as external processors, carrying out

activities connected with, instrumental to or supporting those of the controller, for example: management and maintenance of the content of the websites and Apps, customer support, customer care and call centre services, management of Information Technology systems, editorial services, debt collection, data processing services for invoicing, archiving of documentation relating to customer relationships, etc.

6. Communication of data

To whom can your data be communicated?

The controller may communicate your data without your express consent for service purposes:

- to the judicial authorities, at their request;
- to subsidiaries and/or investee and/or associated and/or affiliated companies, to the sales network of the controller and to all other parties to whom it is necessary to communicate them, by law or by contract, to allow the purposes described above to be carried out (for example, credit institutions, professional firms, business partners).

7. Data transfer

Where can your data be transferred?

Your data may be transferred outside the European Union to the parties specified in paragraphs 5 and 6. To protect your data in the context of these transfers, the Controller adopts appropriate safeguards, including adequacy decisions and standard contractual clauses approved by the European Commission.

8. Rights of the data subject

As a data subject, you may exercise the rights referred to in Article 15 GDPR.

Unless the limitations provided for by law apply, you have in fact the right to:

- obtain confirmation of whether or not your personal data exist, even if not yet recorded, and request that such data be made available to you in a clear and comprehensible manner;
- request information and, where applicable, a copy of:
- the origin and category of your personal data;
- the logic of use, if your information is processed with electronic tools;
- the purposes and methods of the processing;
- the identification details of the Controller and of the processors;
- the parties or categories of parties to whom your personal data may be communicated and who may become aware of them;
- the period for which your data are retained or the criteria used to determine that period, where possible;

- the existence of an automated decision-making process, including profiling. In this case you may request the logic used, the significance and the envisaged consequences for you;
- the existence of appropriate safeguards in the event of transfer of your data to a non-EU country or to an international organisation;
- obtain, without undue delay, the updating, amendment or rectification of your incorrect data or the completion of your incomplete data, where you have an interest therein;
- obtain the erasure or blocking of your data or, where possible, their anonymisation:
- if processed unlawfully;
- if no longer necessary in relation to the purposes for which they were collected or subsequently processed;
- in the event of withdrawal of the consent on which the processing is based and where there is no other legal ground;
- where you have objected to the processing and there are no further legitimate grounds for continuing to use your data;
- where required by law;
- where they relate to minors.

The Controller may refuse to erase your data in the case of:

- exercise of the right to freedom of expression and information;
- compliance with a legal obligation, performance of a task carried out in the public interest or exercise of official authority;
- reasons of public interest in the area of public health;
- archiving in the public interest, scientific or historical research or statistical purposes;
- establishment, exercise or defence of a right in court.
- obtain the restriction of the processing in the case of:
- contesting of the accuracy of the personal data, if you have not preferred to request the amendment, updating, amendment or rectification of your data;
- unlawful processing by the Controller, to prevent its erasure;
- exercise of one of your rights in court;
- verification of whether the legitimate grounds of the Controller override those of the data subject.
- receive, where the processing is carried out by automated means, without hindrance and in a structured, commonly used and readable format, the personal data concerning you that you have provided to us on the basis of consent or of a contract, in order to transmit them to another Controller or – where technically feasible – to obtain their direct transmission by the Controller to another Controller
- object at any time, in whole or in part:
- on legitimate and overriding grounds relating to your particular situation, to the processing of personal data concerning you;
- to the processing of personal data concerning you for marketing and/or profiling purposes (e.g. you may object to the sending of advertising or direct sales material or to the carrying out of market research or commercial

communications, through the use of automated calling systems without the intervention of an operator, by email and by traditional marketing methods, by telephone and paper mail).

For all the cases mentioned above, where necessary, the Controller will inform the third parties to whom your personal data are communicated of any exercise of your rights, except in specific cases (e.g. where this proves impossible or involves a manifestly disproportionate effort compared with the right protected).

9. Methods for exercising rights

You may at any time modify and withdraw the consents given and exercise your rights by contacting the Controller at the following contact details:

- Email address privacy@intred.it

For the processing covered by this notice, you have the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

10. Controller, DPO and Processors

- The data controller is INTRED SPA, via P. Tamburini, n. 1, 25136 Brescia.

Pursuant to Article 37 GDPR, the data controller has appointed the Data Protection Officer, whose contact details are as follows:

- **Data Protection Officer**: Via P. Tamburini, n. 1, 25136 Brescia
- **Data processors**: email rpd@sgsolution.eu

This document is an English translation of the original Italian document and is provided for ease of reference. The translation may contain errors, omissions or inaccuracies. In the event of any discrepancy or inconsistency between this translation and the Italian original, the Italian original shall prevail to the extent permitted by applicable law.