INTRED S.p.A., with registered office in Via Tamburini 1, Brescia, Tax Code 11717020157 and VAT No. 02018740981 (hereinafter also the "Controller"), in its capacity as data controller, hereby informs you, pursuant to Article 13 of the European Privacy Regulation 2016/679 ("GDPR"), of the purposes and methods of the processing of your personal data.

This document will inform you in particular about:

1. THE SUBJECT OF THE PROCESSING
2. THE PURPOSE OF THE PROCESSING
3. THE METHODS OF THE PROCESSING
4. WHETHER OR NOT THE DATA ARE MANDATORY
5. THE RETENTION OF THE DATA
6. ACCESS TO THE DATA
7. THE COMMUNICATION OF THE DATA
8. THE TRANSFER OF THE DATA
9. THE RIGHTS THAT MAY BE EXERCISED
10. HOW TO EXERCISE THE RIGHTS
11. THE CONTROLLER, THE PROCESSORS AND THE DPO

## 1. Subject of the processing - What data are used?

The Controller processes:

- identification and non-sensitive data (in particular, first name, surname, tax code, VAT number, email address, telephone number, bank and payment details). These are the data provided by you when subscribing to/activating the Service or subsequently, by way of example but not limited to, when contacting technical staff or business partners of INTRED S.p.A.;
- browsing data acquired by the IT systems and software procedures responsible for the operation of the website. 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, for example, IP addresses and other information relating to the user's operating system and IT environment;
- telematic and telephone traffic data, such as logs, source IP address, telephone number.

## 2. Purpose of the processing - Why and on what legal basis are your data collected?

Your data will be processed lawfully and fairly

a) For Service Purposes (Article 6(b), (e) GDPR), and in particular:
   i. for and within the scope of the performance of the Contracts to which you are a party and for the adoption of pre-contractual measures taken at your request
   ii. to be able to contact you again in order to handle any requests made in the forms available on the website;

iii. for the management of initiatives dedicated to Customers (e.g. prize competitions, loyalty programmes, etc.);
iv. to comply with the legal and tax obligations to which the Controller is subject;
v. for the pursuit of the legitimate interest of the Controller, provided that the interests or fundamental rights and freedoms of the data subject do not prevail, taking into account the reasonable expectations of the data subject based on their relationship with the data controller;
vi. to be able to send promotional communications advertising products and/or services similar to those previously purchased, without prejudice to the right to object at any time to the sending of such communications,
vii. where it is necessary to establish, exercise or defend a right in court,

b) Subject to your express consent, for Marketing Purposes (Article 6(a) GDPR) and in particular:
i. to inform you by ordinary letters, telephone calls, email, SMS, MMS, notifications and newsletters of the initiatives and offers of INTRED S.p.A. and to offer you questionnaires and market research;
ii. for **profiling** activities, i.e. to analyse, also by automated means, your preferences and interests (for example the use of the services, the features used, connection times, traffic data, etc.) and to offer you personalised services, content, initiatives and offers (by ordinary letters, telephone calls, email, SMS, MMS, notifications and newsletters).

**3. Methods of the processing - How are your data used?**
Your personal data are processed by means of the operations indicated in Article 4(2) GDPR, namely: collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of the data.
Your personal data are processed both on paper and electronically and/or by automated means.

**4. Whether or not the data are mandatory - Which data are mandatory and which are optional?**
Providing the data for the purposes referred to in point 2 letter a) is a legal and contractual obligation and is necessary in order to use the services requested. Providing the data for the purposes referred to in letter b) of the same point 2 is optional, and failure to provide them or failure to consent to the processing will not prevent you from using the services, but only from receiving commercial communications and/or personalised offers respectively.

**5. Retention of the data - How long are your data kept?**
The Controller retains your personal data for no longer than 10 years from the end of the relationship for service purposes and in any case for the limitation period provided for by law; for the duration of your consent and in any case for no longer than 18 months from the end of the relationship for marketing purposes; for the

duration of your consent and in any case for no longer than 12 months from collection, for profiling purposes.
Thereafter, your data will be erased or anonymised and processed for aggregate and anonymous statistical analysis.

**6. Access to the data - Who can access your data?**

- Your data are accessible to:
- employees and/or contractors of the Controller in their capacity as authorised persons and/or system administrators;
- business partners and service providers carrying out outsourced activities on behalf of the Controller in their capacity as external data processors - performing 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 recovery, data processing services for invoicing, archiving of documentation relating to relationships with customers, etc.

**7. Communication of the data - To whom may 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 the third-party Companies to which they must be communicated, by law or by contract. Such Companies will process the Customer's data in their capacity as independent Controllers and/or Processors. The Controller may communicate the data to third-party companies to allow them to pursue their own marketing purposes described above: to this end, the Controller will ask you, after identifying the Third Party to whom your data will be transmitted, for specific consent before the communication. These parties will process your data in their capacity as independent Controllers. In any case, we wish to reassure you that your data will not be disclosed.

**8. Transfer of data - Where may your data be transferred?**

Your data may be transferred outside the European Union to the parties specified in paragraphs 6 and 7. To protect your data in the context of these transfers, the Controller will adopt all the safeguards referred to in Articles 44 et seq. of the GDPR.

**9. Rights of the Data Subject**

In your capacity as Data Subject, you may exercise the rights referred to in Articles 15, 16, 17, 18, 20, 21, 22 of the GDPR.
Unless the limitations provided for by law apply, the Data Subject has the right to:

- obtain confirmation as to 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 understandable manner;
- request information and, where applicable, a copy of:
  a. the origin and category of your personal data:
  b. the logic of use, if your information is processed with electronic tools;

c. the purposes and methods of the processing;
d. the identification details of the Controller and the processors;
e. the parties or categories of parties to whom your personal data may be communicated and who may become aware of them;
f. the period for which your data are retained or the criteria used to determine that period, where possible;
g. the existence of automated decision-making, including profiling. In that case you may request the logic used, the significance and the envisaged consequences for you;
h. 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, modification or rectification of your incorrect data or the completion of your incomplete data, should you have an interest in doing so;
- obtain the erasure or blocking of your data or, where possible, their anonymisation:
  a. if processed unlawfully;
  b. if no longer necessary in relation to the purposes for which they were collected or subsequently processed;
  c. in the event of withdrawal of the consent on which the processing is based and where there is no other legal ground;
  d. where you have objected to the processing and there are no further legitimate grounds for continuing to use your data;
  e. where required by law;
  f. where they relate to minors.

The Controller may:

- refuse to erase your data in the case of:
  a. exercise of the right of freedom of expression and information;
  b. compliance with a legal obligation, performance of a task carried out in the public interest or exercise of official authority;
  c. reasons of public interest in the area of public health;
  d. archiving in the public interest, scientific or historical research or statistical purposes;
  e. establishment, exercise or defence of a right in court;

- obtain the restriction of the processing in the case of:
  a. contesting of the accuracy of the personal data, if you have not preferred to request the modification, updating, modification or rectification of your data;
  b. unlawful processing by the Controller, to prevent its erasure;
  c. exercise of a right in court;
  d. 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 with consent or under a contract, in order to transmit them to another Controller or – if

technically feasible – to obtain their direct transmission by the Controller to another Controller;

- object at any time, in whole or in part:
  a. on legitimate and overriding grounds relating to your particular situation, to the processing of personal data concerning you;
  b. 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 selling 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, if 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. when this proves impossible or involves a manifestly disproportionate effort compared with the right protected).

**10. How to exercise the rights**

You may at any time modify and withdraw the consents given and exercise your rights by calling 0307280200 or by sending a request to the Controller at the following 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).

**11. Controller, DPO and Processors**

- The data controller is INTRED S.p.A., Via Pietro Tamburini, 1 – 25124 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 Pietro Tamburini, 1
25124 Brescia
For the attention of the Data Protection Officer
or
Email: rpd@sgsolution.eu

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