

Warrant Hub S.p.A. single-shareholder company

PRIVACY NOTICE (leads)

pursuant to Article 13, Regulation (EU) 2016/679 (the "Regulation" or "GDPR")

With this privacy notice, the Data Controller (as defined below) wishes to illustrate the purposes for which it collects and processes your personal data, what categories of data are processed, what rights you have under data protection legislation, and how you can exercise them, in addition to allowing you - where appropriate - to give your consent for specific processing activities.

1. DATA CONTROLLER

Warrant Hub S.p.A. single-shareholder company, with registered office in Correggio (RE), at Corso Mazzini n° 11, tax identification number and VAT number n. 02182620357.

The Data Controller can be contacted by email at info@warranthub.it or by standard mail at the following address: **Warrant Hub S.p.A. con Socio Unico**, Corso Mazzini, n. 11, 42015 Correggio (RE).

2. DATA PROTECTION OFFICER

The Data Controller has designated a data protection officer (hereinafter referred to as either the “**Data Protection Officer**” or the “**DPO**”), who can be contacted via certified email at dpo_tinexta@legalmail.it, or by standard mail at the following address:

Data Protection Officer
Tinexta S.p.A.
Piazza Sallustio n. 9
00187 Roma (RM)

3. DEFINITION OF PERSONAL DATA AND INFORMATION IN RELATION TO PROCESSING ACTIVITIES

Pursuant to the GDPR, personal data means: *“any information that relates to an identified or identifiable natural person; a natural person is considered to be identifiable if the identity thereof can be established, directly or indirectly, by means, in particular, of an identifier such as a name, an identification number, location data, an online identifier or one or more specific traits or features which express the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person (the “Data”).”*

The Data Controller collects and processes the following categories of Data:

- i. personal and identification data (e.g., first name, surname, tax identification number, VAT number);
- ii. contact details, such as addresses (residence or other address used for notification purposes), email address, and telephone number;

iii. company/firm, sector, employment position, department;

Generally, provision of Data is entirely optional; however, refusal to provide the information requested could prevent the Controller from carrying out your requests.

In any case, the Data Controller undertakes to ensure the information collected and used is appropriate, relevant, and limited to solely information that is strictly necessary to achieve the purposes set out below, likewise undertaking to ensure this does not lead to a limitation or other breach of your rights and freedoms as Data Subject.

4. PURPOSE OF THE PROCESSING AND LEGAL BASIS THEREOF

a. To manage the relationship and take action prior to entry into an agreement and as part of an agreement at your request (e.g. contact request via forms on the sites).

The Data Controller will process the Data in order to carry out your requests and as part of the activities which are necessary, functional, and related to the establishment of any contractual relationship.

To achieve these purposes, the Controller processes your Data in compliance with the lawfulness condition stated in Article 6, paragraph 1, point b), GDPR, i.e. as the processing is necessary in order to perform an agreement to which you - or the organisation for which you are the point of contact - are party or to take action you have requested prior to entry into an agreement.

b. Marketing

If you have given your consent, the Data Controller may process the Data to contact you by telephone and/or to send you business and/or promotional messages concerning any of the products supplied or services provided by the Data Controller and/or other Group member companies, as well as to invite you to participate in events, shows, seminars, etc., organised thereby, possibly in association with third parties, on various topics.

Your data may be processed for this purpose only if you have given your consent, which renders it lawful pursuant to Article 6, paragraph 1, point a), GDPR.

On this matter, you are advised that you have the right to withdraw consent given previously and to change your preferences, free of charge and at any time using - depending on the case - either the link and/or the instructions available at the end of each of the emails received or by expressing your desire to withdraw consent directly to the operator in the case of a phone conversation, or, alternatively, by contacting the Data Controller in the manner set out in paragraph 8 below.

c. Disclosure of Data to other Group member companies for their commercial purposes

If you have given your consent, the Data Controller may disclose your data to other companies in the Group which, in turn, will use them for their own commercial purposes on the basis of the privacy notice which will be provided, pursuant to Article 14, GDPR, by each one thereof on each occasion.

The disclosure of Data to other companies in the Group will only be possible if you have given your specific consent, the said consent constituting the lawfulness basis of the related processing pursuant to Article 6, paragraph 1, point a), GDPR.

You may withdraw your consent to disclosure Data to the other Group member companies, free of charge and at any time, by contacting the Data Controller in the manner set out in Section 8 below. In this case, from the moment consent is withdrawn, the Data Controller will stop disclosing the Data to other Group member companies. If you wish to stop receiving sales messages from Group member companies (other than the Data Controller) which had received the Data prior to you exercising the right to withdraw consent, please refer to the privacy notice provided to you when contacted by each one of the senders of such sales messages.

d. Compliance with a legal requirement

The Data Controller may process your Data if this is necessary to meet legal requirements imposed on them (including, for example, those envisaged by legislation to counter money-laundering).

The processing, if necessary, will be performed in compliance with the lawfulness condition stated in Article 6, paragraph 1, point c), GDPR.

e. Defence of rights

The Data Controller may process your Data in order to exercise and defend its own rights.

The processing, if necessary, will be performed in compliance with the lawfulness condition stated in Article 6, paragraph 1, point f), GDPR.

5. DISCLOSURE OF DATA TO THIRD PARTIES LOCATED WITHIN THE EUROPEAN ECONOMIC AREA

The Data Controller may disclose your data to third parties that provide them with services which are necessary, instrumental, or in some way connected to the aforesaid purposes.

More specifically, your Data may be disclosed to parties (e.g., companies, associations, entities, freelance professionals) working with the Data Controller as part of the activities required to market, distribute, and promote their products or services, including, for example, technology service providers, marketing and/or communication agencies, and external consultants, assigned to carry out the processing as data processors. An updated list of these data processors is kept by the Data Controller and is available upon request.

The Data Controller may also disclose your Data to third parties when legally required to do so, as well as to public administration authorities, other organisations established within the European Economic Area, to business information providers, legal consultants, audit firms, and to credit or electronic money institutions with which the Data Controller works. These parties will process your Data as independent controllers.

Finally, as stated above, if you have given your consent to this, your Data may be disclosed to Group member companies which, acting as independent controllers and on the basis of separate privacy

notices provided to you, will process it in order to send you their business or promotional information.

The Data will not be disseminated.

6. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

In principle, the Data Controller undertakes to process and store the Data on servers located within the European Union.

Nevertheless, in order to achieve the aforesaid purposes, your Data may be passed on to parties established in countries outside the European Economic Area which offer the Data Controller services relating to the processing activities carried out (e.g., technology services providers, cloud service providers, CRM providers, *etc.*).

This transfer, if applicable, will take place in compliance with the conditions set out in the GDPR and will be governed (depending on the recipients) by the standard contractual clauses adopted by the European Commission or, alternatively, on the basis of a Commission adequacy decision and/or any other instrument permitted by applicable legislation.

More information about where your Data has been transferred (when necessary) may be obtained by contacting the Data Provider at the addresses stated above.

7. RETENTION PERIODS

The Data Controller will process your data solely for as long as is strictly necessary to achieve the purposes specified in detail. In particular, depending on the purpose of the processing, the Data will be processed for the following lengths of time:

- i. To manage the relationship and take action prior to entry into an agreement and as part of an agreement at your request/ to meet a legal requirement/ to defend the Data Controller's rights: your Data will be processed during preliminary negotiations and throughout the term of the contractual/commercial relationship and will be kept for a further period of 11 years as of the date of termination thereof, exclusively for purposes relating to compliance with legal requirements or to defend the rights of the Data Controller in court;
- ii. Performance of marketing activities: Your Data will be processed, as appropriate, throughout the contractual relationship (or, if applicable, during the activities prior to establishment of a commercial relationship), or for as long as is needed to carry out your request in full and, subsequently, for a maximum of 24 months, depending on the case, as of the last purchase made or order placed by you, as of expiry/termination of the agreement, as of interruption of negotiations prior to entry into a commercial agreement, as of the last time you expressed an interest, or as of completion of all activities to process the last request you made; in any case, your right to object to the processing or to withdraw consent remains unaffected and if exercised, prevents further processing of the data for marketing purposes;

8. RIGHTS OF THE DATA SUBJECT

During the period in which the Data Controller is in possession of or carries out processing on your Data, you may exercise the following rights as a data subject at any time:

- Right of access - You have the right to obtain confirmation of the existence or otherwise of any processing concerning your Data, and, if applicable, the right to receive information relating thereto;
- Right to rectification - You have the right to obtain rectification of your Data in our possession, if incomplete or inaccurate;
- Right to erasure - in certain circumstances, you have the right to obtain the erasure of your Data in our archives if not relevant in order to continue the contractual relationship or necessary to meet a legal obligation imposed on the Data Controller or to establish, exercise, or defend a right thereof before a judicial authority;
- Right to restriction of processing - when certain conditions are met, you have the right to have the processing of your Data restricted;
- Right to portability - in certain circumstances, you have the right to receive personal data concerning you and you have the right to transmit the Data to another Controller;
- Right to object - You have the right to object, at any time for reasons connected to your individual situation, to the processing of Data concerning you (including profiling) when the basis for such processing is lawfulness, legitimate interest, performance of a task of public interest, or the exercise of public powers, unless there are legitimate reasons for the Data Controller to continue the processing that override your interests, rights, and freedoms as a data subject or to establish, exercise, or defend a right before a judicial authority;
- Right to withdraw consent - You have the right to withdraw consent to the processing of your Data at any time, without this affecting the lawfulness of processing based on consent given prior thereto;
- Right to lodge a complaint with the data protection authority - should the Data Controller refuse to meet your requests for access, the reasons for such refusal must be provided. If applicable, you have the right to lodge a complaint as set out in the following section.

The aforesaid rights may be exercised in relation to the Data Controller by writing to the address stated in §1 or by contacting the Data Controller's DPO at the addresses stated above in §2.

The exercise of your rights as a data subject is free of charge pursuant to Article 12, GDPR.

9. COMPLAINTS

If you wish to file a complaint concerning the ways in which your Data is processed by the Data Controller, or regarding the way a request you have submitted has been handled, you have the right to file a complaint directly with the data protection authority.

10. FINAL PROVISIONS

The Data Controller reserves the right to modify and/or update this privacy notice on the basis, amongst other things, of legislative and regulatory changes within the field of personal data protection, as well as in the event of action by competent authorities.

The updated version of the privacy notice will always be published on the Data Controller's website.