

NOTICE ON THE PROCESSING OF PERSONAL DATA

Artt. 13 and 14 Regulation (EU) 679/2016

Dear Customer,

Segafredo Zanetti S.p.A. (hereinafter also “**Segafredo**” or the “**Company**”) recognises the importance of personal data protection and regards their protection as one of the key priorities of its business.

This notice is disclosed to any Customers who are natural persons and to any natural persons operating in the name and on behalf of Customers who are legal entities.

We inform you that the personal data that you will supply at the time of the establishment and performance of the contractual relationship with Segafredo or otherwise acquired within the scope of the activity carried out by Segafredo may be subject to processing in the terms set out below, in compliance with the principles of lawfulness, fairness, transparency, restriction of purposes and retention, data minimisation, accuracy, integrity and confidentiality envisaged by the applicable regulations.

1. Applicable regulations

Regulation (EU) 679/2016 – General Data Protection Regulation (“**GDPR**”) and Legislative Decree 196/2003 supplemented by Legislative Decree no. 101 of 10 August 2018 (“**Data Protection Code**”) – hereinafter, jointly, “**Applicable Regulations**”.

2. Data Controller

The Data Controller is Segafredo Zanetti S.p.A., REA no. 140533, tax ID 00895860377 with registered office in Via G. Puccini, 1, Sesto di Rastignano (BO) – Italia, e-mail privacy@segafredo.it.

3. Purpose of the processing and consequences in case you refuse to provide your personal data

The Company shall process your personal data for the purposes set out below.

3.1. Management of Customer relationships or the purchase of a product or service

Specifically:

- conducting relations with the Customer on the basis of pre-contractual and contractual agreements
- correct and complete establishment, management and fulfilment of the contractual relationship with the Customer
- fulfilment of legal obligations related to civil, tax, accounting regulations, etc. as well as national or Community regulations or laws
- management and implementation of inspection and audit activities, also by third parties, in order to check compliance with the applicable laws and the Company’s internal policies
- fulfilment of further requests formulated by the Customer in relation to the existing contractual relationship
- implementation of post-sales support activities
- management of litigations, in case of non-compliance, disputes, judicial disputes and/or settlements.

For the said purposes, Segafredo shall process personal data (name, surname, date of birth, tax ID, etc.) and contact details (telephone number, mobile phone number, e-mail, etc.), bank details (IBAN, etc.) and any other data supplied by you, in preparation for and/or connected to the establishment and/or fulfilment of the contractual relationship.

The provision of your personal data for the purposes mentioned above in point 3.1 is a necessary requirement: any refusal would prevent you from purchasing the product or service required or establishing a pre-contractual or contractual relationship with Segafredo.

3.2. Additional purposes

With your consent, which is optional, the Company shall process your personal data for the following purposes:

- marketing purposes, i.e. to send you promotional newsletters, commercial or advertising communications on promotional and commercial initiatives of the Company, of its sales and assistance network and its partners;
- market research and level of satisfaction surveys, in addition to carrying out statistical analyses with anonymous data, organised in an aggregated manner.

Marketing activities are conducted via e-mail, newsletter, telephone calls with an operator, text messages, MMS and traditional post, including the sending of invitations to events organised by the Company.

With your consent, which is optional, the Company collects information relating to your preferences, habits, lifestyle, profession as well as the details of the services/products purchased from us to use it to create group and individual profiles (“**profiling**”) which are used to send customised communications and to conduct market research and statistical analyses with anonymous data, organised in an aggregated manner. Customised marketing activities are conducted via e-mail, newsletter, telephone calls with an operator, text messages, MMS and traditional post, including the invitations to events we deem in your interest organised by the Company. In any case, you may at any time indicate the preferred method of contact out of those reported above and may object to receiving promotional communications, customised and not, through all or just some of the communication channels stated above. For the marketing and profiling activities the Company uses personal and contact data such as name and surname, e-mail, telephone number, date of birth, tax ID, data relating to residence/domicile (city/town, province, post code, country), details of the services/products purchased from us, the participation in events organised by the Company.

Providing your personal data for the marketing or profiling purposes mentioned above is optional and any refusal will allow you to request the service and/or product in any case.

4. Methods and Legal bases of the processing

The Company processes personal data with and without the help of electronic means, based on logics and procedures that are consistent with the purposes stated below and in compliance with the Applicable Regulations, including the confidentiality and security profiles. In compliance with the Applicable Regulations, your personal data is used to update and correct the previously collected information. The Company processes personal data based on the following legitimacy criteria:

- the fulfilment of pre-contractual and contractual obligations between the Customer and the Company;
- the fulfilment of legal obligations;
- your consent, where envisaged;
- the Company’s legitimate interest to protect its rights.

5. Communication of personal data to third parties

Your personal data is accessible to our duly authorised personnel based on need criteria and is communicated to third parties in the following cases:

- i. when the communication is required by law and applicable regulations with respect to legitimate third party recipients of the communications, such as authorities and public entities for the respective institutional purposes, including the police force;
- ii. communication to third parties in case of extraordinary transactions (e.g. mergers, acquisitions, sale of company, etc.).

The personal data may also be shared, for the purposes described above, with i) other companies of the Massimo Zanetti Beverage Group, ii) people, companies, associations or professional firms that provide services or assistance and consultancy to the Company, with specific but not exclusive reference to legal, administrative, accounting, tax, credit collection, market research and data processing matters, advertising agencies, IT services, logistics, etc.; (iii) banks and factoring companies, iv) certification bodies. We only provide these subjects with the data that is necessary to perform the agreed services and these act as independent Data Controllers or Data Processors, based on the instructions received from the Company.

The data subject may request - with the methods set out in this notice - the list of subjects to whom the personal data is or may be disclosed.

6. Transfer of personal data outside the EU

The Company may transfer the personal data to countries located outside the European Union and the European Economic Area (Article 49, GDPR) where the transfer is necessary to fulfil the contract (for example, in the case where the entities indicated in the paragraph above are established in these countries), to execute pre-contractual measures taken at the request of the data subject, to ascertain, exercise or defend a right in court, to protect vital interests if the data subject is unable to provide consent.

7. Retention of personal data

Your data will be retained for the period of time required for the attainment of the purposes referred to in point 3.1); in any case, the personal data is retained for the contractual term period and for 10 years following its term, termination or withdrawal therefrom, except in cases where retention for a subsequent period is necessary for any disputes, requests by the competent authorities or in accordance with the law or regulation.

For the marketing or profiling purposes referred to in point 3.2), your personal data is retained for the time strictly necessary to pursue these purposes, within the limits permitted by the Applicable Regulations. You may ask for the erasure of the data for these purposes at any time and may object to the processing of data for marketing and/or profiling purposes. The cases where the Company is authorised to retain the data for a different period in order to fulfil a legal obligation, exercise or defend rights in court, remain unaffected.

8. Rights of the data subject

The rights recognised to you as data subject under the Applicable Regulations include the rights to:

- ask the Company to access one's personal data and the associated information (Art. 15, GDPR); the rectification of any inaccurate data or the supplementation of any incomplete data (Art. 16, GDPR); the erasure of one's personal data (upon the occurrence of one of the conditions specified in Art. 17, no. 1 of GDPR and in compliance with the exceptions provided under no. 3 of the same article); the restriction of personal data processing (upon the occurrence of one of the cases indicated in Art. 18, no. 1 of GDPR);
- request and obtain from the Company - in the cases whereby the legal basis of the processing is the consent and said consent is given with automated means - the personal data in a structured format that can be read by an automatic device, including with the purpose of disclosing such data to another data controller (Art. 20, GDPR);
- object at any time against the processing of personal data upon the occurrence of specific situations affecting the data subject and in compliance with the provisions laid down in Art. 21, GDPR;
- withdraw the consent at any time, limited to the cases whereby the processing is based on the consent for one or more specific purposes and concerns common personal data or special categories of data. The processing based on consent and carried out prior to the withdrawal thereof shall in any event retain its lawfulness (Art. 7, GDPR).

Exercise of the rights may take place by sending a request to the Company to the address Via G. Puccini, 1, Sesto di Rastignano (BO), or via e-mail to the address privacy@segafredo.it.

If the data subject believes that the processing of his/her personal data provided is in breach of the applicable regulations on the protection of personal data, the data subject has the right to lodge a complaint with the Personal Data Protection Authority (Art. 77, GDPR) or bring the matter to the competent courts (Art. 79, GDPR).

The exercise of the data subject's rights provided for in articles 15, 16, 17, 18, 19, 20, 21 and 22 of GDPR may be delayed, restricted or excluded in the presence of certain conditions, for example in the event that such exercise may entail an effective and concrete prejudice to the confidentiality of the employee's identity that indicates an offence pursuant to Law 179/2017 (so-called whistleblowing), to interests protected by provisions concerning money laundering and the protection of victims of extortion, or to the conduct of defensive investigations or the exercise of a right in court etc. (Data Protection Code, art. 2-undecies).

CONSENT TO THE PROCESSING OF PERSONAL DATA

Having read and understood the privacy policy above, for the processing of my personal data by SEGAFREDO ZANETTI S.p.A.:

- 1) for marketing activities via e-mail, newsletter, telephone, text message, MMS and traditional post

I agree

- 2) for profiling purposes and for the sending of customised communications via e-mail, newsletter, telephone, text message, MMS and traditional post

I agree

Place and date:

Signature: