



Sisal S.p.A.  
Via A. di Tocqueville, 13  
20154 Milano  
www.sisal.com

## PRIVACY POLICY

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679 (the "Regulation"), Sisal S.p.A., as data controller (the "Data Controller" or the "Company"), wishes to inform the participants (the "Data Subjects") in the Gobeyond contest (the "Contest") about the purposes and methods of the processing of their personal data, the scope of the data's communication and the nature of their provision, as regards their participation in the Contest.

### 1. Data Controller

The Data Controller is Sisal S.p.A., a joint-stock company duly incorporated and existing under the laws of Italy, subject to direction and coordination of Sisal Group S.p.A., registered in Milan, under registration number 04900570963 and having its registered office at Via Alessio di Tocqueville 13, Milano ITALY.

### 2. Data Protection Officer

The Data Controller appointed a data protection officer ("DPO") who can be contacted at the following email address: dpo@sisal.it.

### 3. Source of the processed data

The personal data to be processed are acquired by the Data Controller directly and/or indirectly through third parties specifically appointed to do so, directly from the Data Subjects when they register for the Contest and from third parties (in order to check whether the Data Subjects meet the eligibility criteria for participation in the Contest as set out in the call for ideas).

### 4. Purpose and legal basis of the processing

The Data Controller processes the personal data for the following purposes:

- a) To allow the Data Subjects to register and participate in the Contest and to properly organise the Contest: this processing of personal data is necessary to allow the Data Subjects to register and to participate in the Contest and to allow the Data Controller to correctly organise and manage the Contest (e.g. to identify the winners, award the prizes, etc.) and to perform the related activities such as, for example, processing and storing the processed data. The legal basis of the processing is the performance of a contract to which the Data Subject is party.
- b) To comply with the law and orders/instructions of public authorities and/or supervisory bodies: the processing of personal data is necessary to allow the Data Controller to comply with the law and/or orders/instructions of public authorities (e.g., public security authorities, judicial authorities) and/or supervisory bodies. The legal basis for the processing is the compliance with a legal obligation by the Data Controller.
- c) To pursue the Data Controller's legitimate interests: the processing of personal data is necessary to allow the Data Controller to pursue its legitimate interests related to, for example, checking whether the Data Subjects are eligible to participate in the Contest, safeguarding its assets (e.g. preventing fraud on its website), monitoring and checking service quality, managing any disputes and exercising or defending its rights in or out of court. The legal basis for the processing is the pursuit of the Data Controller's legitimate interests.

### 5. Categories of personal data processed and processing methods

The personal data processed by the Data Controller are: identity and contact details (e.g., name and surname, email address); audio and video recordings (from the elevator pitch uploaded by the Data Subject); browsing data (e.g., the IP address of the device used, the time and length of the connection); financial and banking data (e.g., the Data Subject's IBAN to provide the possible funding); data about the relationships between the Data Subject and the Data Controller and/or the Data Controller's partners (to check whether the Data Subject is eligible to participate in the Contest as set out in the call for ideas); any other data voluntarily communicated by the Data Subjects to the Data Controller in the context of their communications. The data is processed using manual and automated tools with logics strictly related to the above purposes and, moreover, in accordance with the precautions, guarantees and mandatory measures prescribed by the reference legislation, aimed at ensuring the confidentiality, integrity and availability of the data, as well as avoiding damages, either material or immaterial (e.g., loss of control of personal data or limitation of rights, discrimination, theft or usurpation of identity, financial loss, unauthorized decryption of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social damage).

### 6. Communication and dissemination

To pursue the above purposes, the Data Controller reserves the right to communicate the personal data to the following categories of recipients:

- public authorities and/or supervisory bodies (e.g., judicial authorities, public security authorities, etc.);
- other companies of the group to which the Data Controller belongs or its parents, subsidiaries or associates, as per article 2359 of the Italian Civil Code, based in Italy or abroad;
- partners involved in promoting, organising and managing the Contest with the Data Controller;
- managers of the web platforms where the participants' videos will be published;
- online and offline press agencies;
- parties that acquire, process and store data;
- parties that provide services for the Data Controller's IT system and TLC networks (including chat and email services);
- parties that store documentation and data entries;
- parties that provide assistance to the Data Subjects;

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Società con unico azionista soggetta all'attività di direzione e coordinamento di Sisal Group S.p.A.  
Capitale sociale: euro 125.822.467,22 i.v. - R.E.A. n. 1780722 (C.C.I.A.A. di Milano)  
Codice fiscale, partita IVA e n.ro di iscrizione nel Registro delle Imprese di Milano - Sezione ordinaria: 04900570963  
Sede legale: Via A. di Tocqueville n.13 - 20154 Milano - T.02.88681 - F.02.29000811 - sisal@legalmail.it

Dati per Fatturazione: Partita IVA del Gruppo IVA: 10541150966  
Codice destinatario per Fatturazione Elettronica: A4707H7



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- professional firms or companies that provide advisory or consultancy services;
- parties that provide communication advisory or consultancy services;
- parties that perform analyses of the activities of visitors to the website and online campaigns designed to improve the content and services, including using cookies (more information about the cookies is available in the cookie policy);
- parties that check, audit and certify the Data Controller's business activities;
- parties that take over title to legal relationships from the Data Controller (e.g., transferees or potential transferees of goods, credits and/or contracts).

The parties included in the above categories operate as separate data controllers or as data processors specifically appointed by the Data Controller. The updated list of such third parties can be obtained by sending an email to [privacy\\_sisal@legalmail.it](mailto:privacy_sisal@legalmail.it). Personal data can also be processed by the Data Controller's employees authorised to process data and in line with their specific duties.

The Data Subjects' personal data will be disseminated within the limitations set out in the call for ideas (e.g. publication of videos on the web platforms of the Data Controller or third parties, communication of the winners' names to the online and offline press agencies). The acceptance of the call for ideas and the participation in the Contest constitute the consent of the Data Subject to the dissemination of such data for conclusive facts.

#### **7. Transfer of data outside the EU**

The Data Controller informs that, to pursue the above purposes, the Data Subject's personal data may be communicated to parties based in countries outside the European Union that cooperate with the Data Controller to achieve the above-mentioned purposes. The transfer of data will take place only when there are international agreements in place or adequacy decisions by the Commission (article 45 of the Regulation) or binding corporate rules ("BCR" as per article 47 of the Regulation) or in any case on the basis of other appropriate safeguards that guarantee an adequate degree of protection to the personal data communicated or transferred. A copy of the personal data transferred abroad and a list of the international third countries/organisations to which the personal data have been transferred can be requested of the Data Controller by sending an email to [privacy\\_sisal@legalmail.it](mailto:privacy_sisal@legalmail.it).

#### **8. Data retention**

The Data Controller will retain the Data Subject's personal data for the following periods of time in line with the various purposes described in paragraph 4:

- for 10 years from the end of the Contest in order to manage the Contest;
- until the term set by the legal obligation and orders/instructions of public authorities and/or supervisory bodies expires to comply with such legal obligations and orders/instructions;
- until its legitimate interests expire, considering both the rights of the Data Controller and Data Subject, with respect to pursuing its legitimate interests.

Once these time periods expire, the Data Controller will erase the Data Subjects' personal data or render them anonymous irreversibly.

#### **9. Data Subjects rights**

The Data Subjects rights as per articles 15 to 22 of the Regulation are guaranteed. Specifically, the Data Subject may obtain: a) confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data; b) the rectification of inaccurate personal data and the completion of incomplete personal data; c) the erasure of personal data when allowed by the Regulation; d) the restriction of processing in the cases provided for by the Regulation; e) the communication of any requests for rectification or erasure of personal data or restriction of processing to the recipients to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort; f) the receipt in a structured, commonly used and machine-readable format of the personal data provided to the Data Controller and the transmission of those data to another data controller. The Data Subject has the right to object at any time to processing of personal data concerning them: in these cases, the Data Controller shall no longer process the personal data except in the cases allowed by the Regulation. The Data Subject also has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them, unless this decision: a) is necessary for entering into, or performance of, a contract between the Data Subject and the Data Controller; b) is authorised by Union or Member State law to which the Data Controller is subject; c) is based on the data subject's explicit consent. In the cases referred to in points a) and c), the Data Subject has the right to obtain human intervention on the part of the Data Controller, to express their point of view and to contest the decision. The Data Subject can send their requests to the email address [privacy\\_sisal@legalmail.it](mailto:privacy_sisal@legalmail.it). The Data Subjects also have the right to lodge a complaint with the Italian Data Protection Authority, as provided for by article 77 of the Regulation and the right to an effective judicial remedy in accordance with articles 78 and 79 of the Regulation.

#### **10. Nature and mandatory obligation of the communication of personal data**

The Data Subject's participation in the Contest is subject to their communication of personal data. This is mandatory for the purposes set out in paragraph 4. The Data Subject's refusal to provide the necessary data implies the impossibility of participating in the Contest.

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