



WEB PRIVACY POLICY

Pursuant to article 13 of Regulation (EU) 2016/679 (hereafter the "Regulation"), this page describes the methods for processing the personal data of users (the "Data Subjects" or "Users") who consult **gobeyond.info** (the "Website"). This information does not concern other websites, pages or online services accessible through hypertext links that may be published on the Website but referring to resources external to the domain or the sub-domains of the Website. Specific policies are published on the pages of the Website arranged for the provision of particular services.

DATA CONTROLLER

Sisal S.p.A., a company with sole shareholder subject to management and coordination by Sisal Group S.p.A., with registered office in Milan, Via A. de Tocqueville 13.

DATA PROTECTION OFFICER

The Data Controller designated a Data Protection Officer ("DPO"). The DPO can be contacted at the following email address: dpo@sisal.it.

CATEGORIES OF DATA, RETENTION PERIODS, PURPOSES AND LEGAL BASIS OF THE PROCESSING

Browsing data

The information systems and software procedures relied upon to operate this Website acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols. This data category includes the IP addresses and/or the domain names of the computers and terminal equipment used by any User, the URI/URL (Uniform Resource Identifier/Locator) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the User's operating system and computer environment.

These data are **necessary to use web-based services** and are also processed in order to:

- a) **extract statistical information on service usage** (most visited pages, visitors by time/date, geographical areas of origin, etc.);
- b) **check functioning of the services.**

Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller. The data will be processed until the legitimate interest of the Data Controller is exhausted, except for any **need to establish the commission of criminal offences against the Website or to comply with requests from public authorities and / or surveillance bodies.**

Data communicated by Users

Sending messages, on the basis of the User's free, voluntary, explicit choice, to the contact addresses published on the Website, or sending private messages to Data Controller's social media pages and profiles (where this option is available), or using phone/fax numbers and filling in and sending the forms made available on the Website entail the acquisition of the sender's contact information – **which is necessary to provide for a reply to the Data Subject's requests** – as well as of any and all the personal data communicated in that manner or required in the context of the compilation of the forms. Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract. The data will be processed for the time necessary to respond to the Data Subject's request and will be deleted after 24 months. If the data are acquired under a contract, they will be kept for the time necessary to fulfill the contractual and legal obligations (e.g., tax matters) in relation to the performance of the activity for which the request was managed.

The User can also provide their personal data to register for the Data Controller's **newsletter**: in this case, the data will be kept until the Data Subject requests unsubscribe. Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.

The Users can voluntarily provide the Data Controller with their personal data also by creating their own account. The personal data thus conferred are collected and processed by the Data Controller to **generate and manage the User's account**. Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract. The data will be processed for the time the account is active and deleted following the request for deactivation of the same by the User or, automatically, after 24

months from the acquisition or from the last activity carried out in case of non-use of the account by the User. If the data are acquired under a contract, they will be kept for the time necessary to fulfill the contractual and legal obligations (e.g., tax matters) in relation to the performance of the activity for which the account was created and used.

MODE OF PROCESSING

The data is processed using IT, telematic and, residually, manual tools, with logic strictly related to the purposes outlined above and, in any case, in compliance with the precautions, guarantees and necessary measures prescribed by the reference legislation, in order to ensure the confidentiality, integrity and availability of the personal data, as well as to avoid damage, whether tangible or intangible (e.g. loss of control of personal data or limitation of rights, discrimination, identity theft or usurpation, financial losses, 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).

COMMUNICATION AND DISSEMINATION

For the pursuit of the aforementioned purposes, the Data Controller reserves the right to communicate personal data to recipients belonging to the following categories:

- public authority and / or supervisory bodies (e.g. judicial authority, Bank of Italy, Agenzia delle dogane e dei Monopoli, public security authority, Ufficio Indagini Finanziarie, etc.);
- other companies of the group to which the Data Controller belongs, or in any case parent companies, subsidiaries or associates, pursuant to art. 2359 of the Italian Civil Code, also located abroad;
- subjects that perform data acquisition, processing and storage services;
- subjects that provide services for the management of the Data Controller's information system and telecommunications networks (including chat and mailing services);
- subjects who carry out assistance activities to the Data Subject;
- professional firms or companies in the context of assistance and consultancy relationships;
- subjects who carry out communication assistance and consultancy;
- subjects who control, review and certificate the activities carried out by the Data Controller;
- subjects who in various capacities succeed the Data Controller in the ownership of legal relationships (e.g. assignees or potential assignees of goods, credits and / or contracts).

The subjects belonging to the categories listed above operate independently as separate data controllers, or as Data Processors appointed for this purpose by the Data Controller. The updated list of the third parties to which personal data are communicated is available by submitting a request to privacy_sisal@legalmail.it. The data may also be known, in relation to the performance of the tasks assigned, by the Data Controller staff, specifically authorized by the Data Controller to the processing.

Personal data, in any case, will not be disseminated and, therefore, will not be brought to the attention of indeterminate subjects, in any form, for example by making them available for consultation, without the express consent of the Data Subject, when requested. However, Users who use the forums, or other channels provided by the Data Controller, to publish their content, including their personal data, on this Website, recognize that the information made public can be read, collected and used by third parties who have not no relationship with the Data Controller, even for sending unwanted messages. The Data Controller declares himself exempt from liability for any undue use that third parties may make of personal data that Users choose to publish through the aforementioned channels.

TRANSFER OUTSIDE OF THE EU

The Data Controller informs the Data Subjects that, for the pursuit of the aforementioned purposes, the personal data of the Data Subjects could be communicated to subjects located in countries outside the European Union, who cooperate with the Data Controller in the realization of the purposes of above. In any case, this transfer will take place only against the existence of international agreements or adequacy decisions by the Commission (pursuant to art. 45 of the Regulation) or against the stipulation of binding corporate rules ("BCR", pursuant to Article 47 of the Regulation) or in any case on the basis of other appropriate guarantees that guarantee an adequate degree of protection for the personal data communicated or transferred. A copy of the personal data possibly transferred abroad, as well as the list of third countries / international organizations to which the personal data have been transferred, can be requested to the Data Controller at the email address privacy_sisal@legalmail.it.

DATA SUBJECTS RIGHTS

Pursuant to articles 15 to 22, the Regulation gives Data Subjects the possibility to exercise specific rights. In particular, the Data Subject can obtain: a) the confirmation of the existence of a processing of personal data concerning him and, in this case, the access to such data; b) the rectification of inaccurate personal data and the integration of incomplete personal data; c) the erasure of personal data concerning him, in cases where this is allowed by the Regulation; d) the restriction of the processing, in the cases provided for by the Regulation; e) the communication, to the recipients to whom the personal data has been transmitted, of requests for rectification / erasure of personal data and restriction of processing received by the Data Subject, unless this proves impossible or involves a disproportionate effort; f) the receipt, in a structured format, commonly used and readable by an automatic device, of the Pe personal data provided to the Data Controller, as well as the transmission of the same to another data controller (so-called data portability). The Data Subject also has the right to object at any time, for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection. In such cases, the Data Controller is required to refrain from any further processing, with the exceptions of the hypotheses allowed by the Regulations. The Data Subject also has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which similarly significantly affects his person, unless such decision: is necessary for the conclusion or execution of a contract between the Data Subject and the Data Controller; b) is authorized by the European Union or Member State law to which the Data Controller is subject; c) is based on the explicit consent of the Data Subject. In the cases referred to in the aforementioned letters a) and c), the Data Subject has the right to obtain human intervention from the Data Controller, to express its opinion and to contest the decision. Requests can be submitted to the address privacy_sisal@legalmail.it indicating in the subject "Privacy - exercise of data subject's rights". The Data Subject also has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement (e.g., Garante per la protezione dei dati personali in Italy), pursuant to art. 77 of the Regulation, as well as to appeal to the appropriate judicial offices pursuant to art. 78 and 79 of the Regulation.

NATURE AND OBLIGATORINESS OF THE PROVISION

Except for what is specified on navigation data and technical cookies, for the processing of which consent is not required and failure to provide it makes it impossible for the Data Subject to follow up the interaction with the Website by the Data Subject and, for the Data Subject, to use the Website and all its features, the User is free to provide his or her personal data to use the features and services made available on the Website. The only consequence deriving from the failure to provide such data will be the impossibility for the Data Subject to use the relative services, without this entailing any prejudicial consequence.

UPDATE OF THIS PAGE

The Data Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained herein so as to stay updated with respect to any changes that have occurred since the last consultation.

Last update and effective date of this page: June 2021