

**PERSONAL DATA PROCESSING POLICY**  
**(hereinafter referred to as the “Privacy Policy”)**

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Pursuant to Articles 13 and 14 of EU Regulation 2016/679 – General Data Protection Regulation (hereinafter the “**Regulation**”), we hereby inform you that Gruppo UNA S.p.A. (“**Gruppo UNA**” or the “**Data Controller**”), as the Data Controller will process certain personal data relating to you for the purposes set out below.

**Who will process the personal data?**

The Data Controller of your personal data is Gruppo UNA S.p.A. ([www.gruppouna.it](http://www.gruppouna.it)) whose registered office is in Via Gioacchino Murat 23 - 20159 Milan.

**What personal data will we process?**

The following categories of personal data will be processed (hereinafter referred to as the “**Data**” or “**your Data**”):

- a) Personal information (by way of example and not limited to, first name, last name, tax code) and contact details (telephone number and email address).

**Why are we going to process the Data?**

The Data will be processed for the purposes and on the basis of the following legal grounds:

- **(F1) - Provision of the services and/or sale of the products requested:** processing takes place in order to provide the Services requested by you and/or to fulfil the order placed by you;
- **(F2) - Fulfilling administrative accounting requirements and compliance with legal obligations:** processing takes place for the purpose of fulfilling administrative and accounting requirements, as well as for the purpose of complying with sectoral regulatory obligations, applicable from time to time, and related to the provision of the Services;
- **(F3) - Protection of rights:** processing takes place in order to protect the rights of the Data Controller, including in a defensive way, both in court and out of court;

#	Categories of Data	Legal basis	Providing the Data
F1	a);	The legal basis for processing is the need to execute a contract to which you are a party	It is necessary to provide your Data to fulfil the stated purpose; in the event of failure to provide them, we will not be able to provide you with the Services requested and/or fulfil the order you have requested
F2	a);	The legal basis for processing is the need to comply with applicable legal requirements from time to time	It is necessary to provide your Data to fulfil the stated purpose; if not provided, we will not be able to comply with any applicable legal obligations from time to time and we may not be able to provide you with the Services requested
F3	a);	The legal basis for the processing is the legitimate interest of Gruppo UNA, represented by the need to protect its rights	The provision of your Data is necessary to achieve the stated purpose; if you do not provide them, we may not be able to provide you with the Services requested

**How will we process your Data?**

Your Data will be processed using procedures and methods, including computerised methods, strictly relevant to the aforementioned purposes, subject to the adoption of security measures deemed appropriate to the risks, and only authorised and trained personnel will have access to the Data, only to the extent strictly necessary to perform the activities that they have been assigned.

**Who will we communicate the Data to?**

The Data can only be disclosed to third parties for the purposes set out above. In particular, the Data may be communicated to:

- external parties to whom the Data Controller entrusts the performance of activities on its behalf (for example, but not limited to, computerised and telematic service providers, debt collection companies, etc.) and with which the Data Controller concludes agreements regulating the processing of personal data;
- to the competent judicial authorities (hereinafter referred to as the “**Judicial Authority**”), public bodies (hereinafter referred to as the “**Public Administration**”), supervisory or public security authorities, both for the purpose of protecting a right of the Data Controller, and if this is necessary for the purposes of complying with a legal provision, regulation or European legislation, or on the basis of an order and/or provision of the aforementioned competent authorities;
- persons entitled to access certain Data necessary for the performance of activities ancillary to the contractual relationship in question (such as, but not limited to, banks and credit institutions, postal service or other companies providing similar services, supervisory institutions, or roadside assistance companies).

Your Data will not be transferred to countries outside the European Union or the European Economic Area; if this is necessary to fulfil the aforementioned purposes, we will do so on the basis of the safeguards provided for in the Regulation, such as a European Commission adequacy decision, or the signing of standard contractual clauses with the Data importer.

#### **How long will we process the Data for?**

Your Data will be processed for the duration of the existing contractual relationship and subsequently retained, for administrative and accounting reasons, as well as to meet the applicable legal requirements from time to time, for ten (10) years from the last entry.

In detail:

<b>Purpose</b>	<b>Retention time</b>
F1	For as long as it takes to process your request for sale and/or service delivery
F2	For ten (10) years from the last accounting entry
F3	For the prescription periods specified in sectoral legislation, as well as for the duration of any litigation and/or for any additional periods deemed useful for the purpose in question

#### **Your rights**

Privacy legislation (Articles 15 to 22 of the Regulation) guarantees you the right to access your Data at all times, to have them corrected and/or supplemented, if inaccurate or incomplete, deleted if they are processed unlawfully, and the portability of the data that you have provided to us, if processed automatically on the basis of your consent or for the contractual services you have requested, within the limits of the provisions of the Regulation (Article 20).

Privacy legislation also gives you the right to request the restriction of the processing of data, if the conditions are met, and to object to the processing on grounds relating to your particular situation.

The Data Protection Officer is available if you require any clarification about the processing of your Data and if you wish to exercise your rights: you can contact them at [privacy@gruppouna.it](mailto:privacy@gruppouna.it).

This does not affect your right to contact the Data Protection Authority, including by lodging a complaint, where deemed necessary, to protect your Data and rights.

#### **DECLARATION OF ACKNOWLEDGEMENT OF THE PRIVACY POLICY**

- I declare that I have read the information on the processing of personal data provided to me by Gruppo UNA S.p.A., as the data controller of my personal data, and the purposes indicated therein.