

PRIVACY NOTICE

Article 13 of the General Data Protection Regulation ("GDPR")



A. Introduction

This Privacy notice is provided with reference to the personal data processing activities carried out by the Data Controller (as defined below), company belonging to the Mondadori Group - a corporate group consisting of the parent company Arnoldo Mondadori Editore S.p.A. and its subsidiaries in accordance with article 2359 of the Italian Civil Code (hereinafter referred to as the "**Mondadori Group**").

B. Data Controller

The company that will process your personal data for the purposes set out in sections C and D of this Privacy notice and which, therefore, will act as data controller (hereinafter, the "**Data Controller**") is **AdKaora S.r.l.** with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative headquarters in Via Mondadori 1, 20054 - Segrate (MI), registered at the Companies' Register of Milan, TAX code and VAT number no. 08105480969.

Contact details:

The Data Controller can be contacted via following channels:

- by writing to the Privacy Office of the Mondadori Group (*ufficio Privacy del Gruppo Mondadori*, Arnoldo Mondadori Editore SpA, Via Mondadori 1, 20054 - Segrate (Milan), Italy);
- by e-mailing privacy@mondadori.it with "*alla cortese attenzione dell'ufficio Privacy del Gruppo Mondadori*".

Moreover, in order to facilitate relations between you and the Data Controller, EU Regulation 2016/679 (hereinafter "**GDPR**") has provided, in certain specific cases, for the appointment of a supervisory and support figure who, among the various tasks entrusted to them, also acts as a point of contact with the Data Subject.

The Mondadori Group has adopted the position of "*Data Protection Officer*" ("**DPO**").

Pursuant to and for the purposes set out in Article 39 of the GDPR, the DPO is called upon to carry out, *inter alia*, the following activities:

- inform and advise the Data controller, the Data processor and the employees performing the Processing on the obligations arising from the GDPR and from other provisions of the EU or Member State relating to the protection of personal data;
- monitor and supervise compliance with the GDPR, applicable regulations on the protection of personal data and the policies and procedures adopted by the Data controller;
- provide support in feedback to the data subject;
- cooperate with the competent Authority for the Protection of personal data.

As provided for in Article 38 of the GDPR, you can freely contact the DPO for all matters relating to the processing of personal data and/or if you wish to exercise your rights as provided in the section H of this Privacy notice, by sending a written communication to the e-mail address dpo@mondadori.it and/or writing to the Data Protection Officer of the Mondadori Group at Arnoldo Mondadori Editore S.p.A., via Mondadori 1, 20054 - Segrate (MI).

C. Purposes for which the Data Controller will process your personal data

C1) In order to allow you to participate in the initiative for which this Privacy notice is issued, the Data Controller needs to collect some of your personal data, as requested in the collection form. The processing of your personal data will be carried out by the Data Controller to enable you to participate in the initiative and will therefore be based legally on the contractual relationship that will be established between you and the Data Controller following your acceptance of the conditions of participation in the initiative, pursuant to Article 6(1)(b) of the GDPR.

In order to allow the Data Controller to carry out the processing activities for the purposes indicated above, it will be necessary to provide the personal data marked with an asterisk (*). If even one of

the marked data is missing, it will not be possible to process your personal data and, consequently, you will not be allowed to participate in the initiative. The personal data that will be requested from you for the purposes indicated above will be those indicated in the contact form, including, but not limited to: name, surname, e-mail address.

C2) Furthermore, subject to your consent, the Data Controller may process your personal data for the following purposes:

- (i) Direct marketing purposes:** this refers to the Data Controller's desire to send you informative and/or promotional communications regarding the products, services and initiatives promoted by the Data Controller. This category includes all activities carried out to promote products/initiatives/services provided and/or sold by the Data Controller.
- (ii) Indirect marketing purposes:** this refers to the Data Controller's intention to carry out promotional and/or marketing activities on behalf of third parties. This category includes all activities carried out to promote products and services sold and/or provided by third parties with whom the Data Controller has legal relationships, without any communication of data in this case.
- (iii) Profiling purposes:** this term refers to the Data Controller's desire to profile you, *i.e.* to assess your tastes, preferences and consumption habits, including in relation to market surveys and statistical analyses. This category includes any form of automated processing of personal data to evaluate certain personal aspects such as, by way of example and without limitation, professional performance, economic situation, personal preferences, interests, reliability, behaviour, location or movements.

The processing of your personal data for the purposes referred to in points (i), (ii) and (iii) will be carried out in accordance with Article 6(1)(a) of the GDPR, *i.e.* on the basis of your consent.

The activities aimed at direct and indirect marketing and profiling referred to in points (i), (ii) and (iii) above are not necessary to allow you to participate in the initiative referred to in purpose C1. If you do not give your consent and/or provide your personal data, you will not suffer any consequences, but the Data Controller will not be able to send you promotional communications, as applicable, of its own and/or third parties, and/or profile you.

The method of contact for direct and indirect marketing and profiling as referred to in points (i), (ii) and (iii) above may be either automated (*e.g.* e-mail, text message) or traditional (where permitted, telephone calls with an operator, postal mail). In any case, and as specified in more detail in sections G and H below, you may withdraw your consent, even partially, for example by consenting only to traditional methods of contact.

D. Additional purposes

D1) In addition, the Data Controller may process your personal data in order to comply with legal obligations and to respond to requests from competent authorities. In this case, the processing of your personal data will be based on the fulfilment of legal obligations to which the Data Controller is subject. The processing of your personal data for this purpose will be carried out pursuant to and in accordance with Article 6(1)(c) of the GDPR

D2) The Data Controller may also disclose or otherwise process your personal data in the context of extraordinary transactions, transfers of contract, company or branch transfers, corporate reorganisation and restructuring in order to conclude and manage such transactions or to fulfil its contractual obligations arising therefrom. The processing of your personal data for this purpose will be carried out pursuant to and in accordance with Article 6(1)(f) of the GDPR, it will therefore be based on the legitimate interest of the Data Controller in carrying out such operations.

D3) The Data Controller may process your personal data in order to establish, exercise and defend its rights in court. The processing of your personal data for this purpose will be carried out pursuant to and in accordance with Article 6(1)(f) of the GDPR and will therefore be

based on the legitimate interest of the Data Controller in protecting its rights.

E. Data recipients

Your personal data may be disclosed to specific parties in order to correctly perform all processing activities necessary to pursue the purposes set out in this Privacy notice. In particular, the following parties may process your Personal data:

- natural persons to whom the Data Controller entrust specific processing operations on your personal data who act under the direct authority of the Data controller complying with instructions given by them. Such natural persons are appointed as persons authorised to process by the Data Controller;
- third parties who carry out part of the processing activities and/or activities connected and instrumental thereto on behalf of the Data Controller by virtue of a contract with the latter (e.g. software houses, companies offering IT maintenance and development services). These subjects are appointed as Data processors;
- third parties who may process your personal data within the scope of the purposes set out in this Privacy notice in their capacity as independent data controllers (e.g. public and private entities, including but not limited to, third party companies, associations, public organisations, insurance companies, consulting firms, freelance professionals, credit institutions, etc.)

F. Data retention period of your personal data

One of the principles applicable to the processing of your personal data concerns the limitation of the storage period, regulated in Article 5(1)(e) of the GDPR.

In light of this principle, your personal data will be processed only to the extent necessary for the purposes set out in sections C and D of this Privacy notice. In particular, your personal data will be processed and then stored for the minimum period of time necessary, namely:

- for the entire duration of the contractual relationship and thereafter for the prescriptive period applicable to the existing relationship;
- for direct and indirect marketing and profiling purposes, up to a maximum of 24 months from the last interaction with the Data Controller and, in any case, until withdrawal of consent using the methods described in the section G of this Privacy notice;
- for the other purposes indicated in the section D (i.e., fulfilment of legal obligations, pursuit of extraordinary operations and protection of rights), personal data will be processed for the period of time strictly necessary to achieve the relevant purpose (e.g., as long as the legal obligation is applicable, until the relevant corporate transaction is carried out, etc.), without prejudice to any applicable prescriptive period. In these cases, the Data Controller will still be responsible for providing you, where necessary or appropriate, with further information in a specific privacy notice supplementing this Privacy Notice.

Without prejudice to any further retention periods that may be imposed by law, as also provided for in *Whereas 65* of the GDPR.

G. Withdrawal of consent

As provided for by the GDPR, if you have given your consent to the processing of your personal data for one or more purposes, you may, at any time, withdraw it totally and/or partially without prejudice to the lawfulness of the processing based on the consent given prior to withdrawal.

The procedure for withdrawing consent is very simple and intuitive. Simply contact the Data Controller using the contact details provided in this Policy. In addition, with regard to emails sent by the Data Controller that are no longer of interest to you, simply click on the link provided at the bottom of each communication.

Furthermore, we inform you that you may object to receiving unwanted calls and/or printed advertising at any time by registering with the Opposition Register ("ROP").

Registration with the ROP can be carried out in one of the following ways:

- 1) Online registration by filling in the appropriate form;
- 2) Registration by phone: by calling the free number 800 957 766 for landlines or 06 42986411 for mobile phones;
- 3) Register by email by filling in the appropriate RPO "Registration" form and sending it to iscrizione@registrodelleopposizioni.it.

For all information on how the ROP works and how to register, please visit www.registrodelleopposizioni.it.

H. Your rights

As provided for in the GDPR, you may exercise the following rights against the Data Controller:

- **Right of access:** you have the right to obtain from the Data Controller confirmation as to whether or not personal data relating to you are being processed (or the existence of an automated decision-making process) and if so, to obtain access to and/or a copy of such personal data (Art. 15 of GDPR).
- **Right to rectification:** you can obtain the rectification or supplementation of your personal data that is inaccurate, partial and/or incomplete (Art. 16 of GDPR).
- **Right to erasure ("right to be forgotten"):** under certain circumstances, you have the right to have your personal data deleted without undue delay (Art. 17 of GDPR).
- **Right to restriction:** under certain circumstances, you may obtain the restriction of processing (e.g. if you object to the processing, if you exercise your right to rectification, and/or if the processing is unlawful). In the event of a restriction on processing, your personal data will only be processed, except for storage, with your consent or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest. We will, in any event, inform you before such restriction is lifted (Art. 18 of GDPR).
- **Right to data portability:** you may, at any time, request and receive all your personal data processed by the Data Controller in a structured, commonly used and machine-readable format or request its transmission to another data controller without hindrance (Art. 20 of GDPR).
- **Right to object:** you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you. In the event of an objection, the Data Controller will refrain from the processing to which you object, unless it can be shown that there are compelling legitimate grounds for processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of a legal claim (Art. 21 of GDPR).

To exercise all your rights, simply contact the Data Controller at the contact details given in section B of this Privacy notice.

You also have the right to lodge a complaint with the supervisory authority: without prejudice to your right to appeal in any other administrative or judicial forum, if you consider that the processing of your personal data is in breach of the applicable legislation and/or that your rights have not been fulfilled, you may lodge a complaint with the Italian Data Protection Authority or other competent supervisory authority.

I. Where your Personal data will be processed

Your personal data will be processed by the Data Controller within the territory of the European Union. If, for technical and/or operational reasons, it becomes necessary to use parties located outside the European Economic Area, the Data Controller undertakes to ensure that the level of protection of your personal data is substantially equivalent to that provided by the GDPR and European data protection legislation. Any possible transfer of data will be regulated in accordance with Chapter V of the GDPR, basing such transfers on: (a) European Commission adequacy decisions; (b) standard contractual clauses drafted by the European Commission; (c) the adoption of corporate binding rules (BCRs).

In any case, you can request more details from the Data Controller if your personal data have been processed outside the European Economic Area.

Glossary

In application of the principle of transparency, we provide below a short glossary containing some key words used by the GDPR and their definition.

- **Personal data:** *“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.*
- **Data subject:** the natural person to whom the personal data relate.
- **Processing:** *“any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”.*
- **Data controller:** *“the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law”.*
- **Data processor:** *“a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller”.*