

PRIVACY NOTICE

PURSUANT TO ARTICLE 13 OF REGULATION (EU) 679/2016 AND TO ARTICLE 13 OF ITALIAN LEGISLATIVE
DECREE NO. 196/2003

Directa Plus S.p.a. – pursuant to article 13 of Regulation (EU) 679/2016 (hereinafter, “**Regulation (EU)**”) and to article 13 of Italian Legislative Decree 196/2003 (hereinafter, “**Personal Data Protection Code**”) and with regard to the personal data of which Directa may enter into possession whenever the data subject visits the website <http://www.directa-plus.com> (hereinafter, the “**Website**”) or whenever a contact and/or an information request is sent by him or her via the specific communication channels present on the Website – provides the following information, which applies only and exclusively to the Website and to the personal data collected through it. It does not apply, therefore, to any other website which the data subject may access through a *link* or in any other way. For said websites, the respective Privacy Policies apply.

In addition, for more specific information about cookies, please refer to Article 5 and to the “**Extended notice on cookies**” in Article 6 of this Notice.

1. DATA CONTROLLER AND PROCESSOR

The Data Controller is Directa Plus S.p.A., fiscal code 04783370960, in the person of its President and legal representative Giulio Cesareo, with registered office in Lomazzo (CO), via Cavour 2, company subject to management and coordination by Directa Plus plc, Registration No. 04679109, with registered office in London (United Kingdom), St James’s Square, 3rd Floor, 11-12, SW1Y 4LB) (hereinafter, the “**Data controller**” or “**Directa**”).

The Data Controller may be contacted through e-mail at the address info@directa-plus.com

The Data Controller has appointed a Data Processor, also contactable through e-mail at the address info@directa-plus.com. Please be advised that pursuant to Article 28 of the Regulation(EU), the Data Processor may, with the consent of the Data Controller, appoint other Processors or be replaced by them. The updated list of the persons acting as Data Processors may be obtained by the Data Subject at any time, by sending a request to the aforementioned contact addresses.

2. PURPOSE FOR PROCESSING OF PERSONAL DATA

a. The processing of personal data is mainly aimed at the browsing of the Website by the Data Subject, as well as at processing any information and/or contact requests sent by the Data Subject through the channels made available for this purpose on the Website.

b. Please be advised that the personal data supplied may also be processed to comply with specific tax, accounting and banking obligations, or to comply with other statutory obligations incumbent on the Data Processor.

c. With the specific consent of the Data Subject, the personal data collected may be used to send communications related to commercial promoting or marketing, including newsletters and market research, through both automated (sms, mms, e-mail, fax) and non-automated means (ordinary mail, phone calls).

3. LAWFULNESS OF THE PROCESSING OF PERSONAL DATA

For the purposes of Article 2, point A of this Notice, the lawfulness of the processing of personal data is laid down in Article 6, paragraph 1, point b) of the Regulation (EU), according to which processing of personal data is lawful whenever it 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.

For the purposes of Article 2, point b of this Notice, the lawfulness of the processing of personal data is laid down in Article 6, paragraph 1, point c) of the Regulation (EU), according to which processing of personal data is lawful whenever it is necessary for compliance with a legal obligation to which the Controller is subject.

For the purposes of Article 2, point c of this Notice, the lawfulness of the processing of personal data is laid down in Article 6, paragraph 1, point a) of the Regulation (EU), according to which the processing of personal data is lawful whenever the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes.

4. DATA RECIPIENTS AND SCOPE OF DISSEMINATION

Personal data shall be communicated and processed only to/by the Data Controller and to/by the employees and/or partners and/or consultants of the Data Controller and/or third parties with whom the Data Controller is engaged in professional relationships, and who are acting as Data Processors pursuant to Article 4, paragraph 1, point g) of the Personal Data Protection Code and to Article 4, paragraph 1, point 8) and Article 28 of the Regulation (EU), or who are Persons in Charge of the processing pursuant to Article 4, paragraph 1, point h) of the Personal Data Protection Code and to Article 4, paragraph 1, point 10) and Article 29 of the Regulation (EU), or to judicial, administrative and stock-market authorities, so as to comply with statutory obligations. Personal data may be transmitted to companies with offices in European Countries and/or outside the European Union territory, which are members or shareholders

of the same corporate Group as the Data Controller or with whom the Data Controller is engaged in professional relationships, for the aforementioned purposes and in compliance with the principles and the safety measures set forth in the Regulation (EU). In such case, the Data Subject may obtain a copy of said data by sending a request to the data controller or to the data processor, at the addresses and through the channels listed in Article 1 of this Notice.

5. CATEGORIES OF DATA PROCESSED AND STORAGE PERIOD

The categories of personal data which may be collected and processed whenever the Data Subject visits the Website or sends an information/contact request are the following:

a. Data provided voluntarily by the data subject

The optional, explicit and voluntary transmission of messages by the Data Subject to the addressees and through the channels made available on the Website implies the subsequent acquisition of the sender's address, which is necessary to fulfill the requests, as well as of any other type of personal data present in the message.

In such case, the data collected shall be processed for the sole purpose of fulfilling the requests of the Data Subject, and shall only be stored for the amount of time necessary to fulfill those requests, which will not exceed 12 months. If specific relationships requiring to extend the storage period are set up with the Data Subject, his or her specific consent shall be requested after a relevant Notice is issued.

b. Cookies

Please be advised that cookies, according to the definition provided by the Italian Data Protection Authority, are "*small text files that are sent to the user's terminal equipment (usually to the user's browser) by visited websites; they are stored in the user's terminal equipment to be then re-transmitted to the websites on the user's subsequent visits to those websites*". Cookies may be distinguished into two major groups:

i). "*technical cookies*", used exclusively with a view to carrying out the transmission of a communication on an electronic communications network, or insofar as this is strictly necessary to the provider of an information society service that has been explicitly requested by the contracting party or user to provide said service. To simplify, they allow users to navigate and fully exploit the resources offered by the Website. Technical cookies may further be divided into **a.** "*browsing cookies*", which allow users to navigate and use the Website (e.g. to purchase an item online or authenticate themselves to access certain sections); and **b.** "*functional cookies*", which enhance the use of the Website according to a set of pre-determined criteria (e.g. the language, the items selected for purchase) with a view to improving the quality of the service provided. Finally, "*analytics cookies*" can be equated to technical cookies from a

legislative standpoint, and are used to collect information on the numbers of visitors for statistical analysis only, with no identification of the single user being performed. Analytics cookies can either be installed by the Website manager or by third-party Websites ("*third-party cookies*");

ii) "*Profiling cookies*", aimed at creating user profiles and used to send ads messages in line with the preferences shown by the user during navigation. To simplify, they are used to pursue analysis research of the Data Subject's behaviour for marketing purposes. Profiling cookies can either be installed by the Website manager or by third parties ("*third-party cookies*").

On accessing the Website for the first time, the Data Subject is immediately shown a banner containing information about the type(s) of cookies present on the Website as well as a link to this Notice and, subsequently, to the Extended Notice on cookies referred to in Article 6. On the Extended Notice page, the Data Subject is provided with additional information about the cookies installed by the Data Controller and by third parties, so as to be able to freely choose what cookies to enable and how.

6. EXTENDED NOTICE ON COOKIES

Visiting the Directa Website may result in installing the following categories of cookies:

i) *browsing cookies*, which allow users to normally browse and use the Website along with the services made available by the Website itself (e.g. authenticate themselves to access certain sections and record the preferences which may be set while visiting the Website). The collection of such data is not aimed at associating them with identified users, and they are only stored for the amount of time necessary to pursue the purposes they were designed for, which shall not exceed 12 months.

ii) *functional cookies*, which allow users to navigate as a function of certain pre-determined criteria (e.f. the language or the country where the user is located) so as to improve the experience of the Website. The collection of such data is not aimed at associating them with identified users, and they are only stored for the amount of time necessary to pursue the purposes they were designed for, which shall not exceed 12 months.

For the aforementioned categories of cookies, both falling into the major group of technical cookies, the Data Subject is not required to give his or her explicit consent, because it is sufficient to inform him/her of their presence, as is the case for this Notice, pursuant to Article 13 of the Data Protection Code and to Article 13 of the Regulation (EU);

iii) *analytics cookies*, used for statistical purposes to gather aggregated and anonymous information on the number of visitors and the patterns of visits to the Website. The collection of said data is not aimed at associating them to specific users, but is only intended for statistical purposes, and they are stored for

the amount of time necessary to carry out the activities of statistics analysis and comparative elaboration, which shall not exceed 12 months.

For these cookies the explicit consent of the Data Subject is not required when they are generated and used directly by the Data Controller, or generated and provided by third parties, making use of devices lowering the identifying capacity of analytics cookies (e.g., by obscuring substantial parts of the IP address). In addition, the use of said cookies must be subject to specific contractual agreements between the Data Controller and the third parties, by which the third party agrees to use cookies exclusively to provide the service, to store them properly, and to avoid crossing the new information with the data already in its possession.

Please note, to this regard, that the Website uses analytics cookies services supplied by third parties, and precisely by Google (please refer to the page www.google.com/analytics/learn/privacy.html?hl=it to read the Notice on safety and privacy principles adopted by Google Analytics to protect user data);

iv) profiling cookies, aimed at creating users profiles and used to send ads messages in line with the preferences shown by the user during web navigation.

Please be advised that the Website does not use profiling cookies installed by the Data Controller, but only profiling cookies installed by third parties acting autonomously as Data Controllers. Consequently, please refer to the specific and respective Privacy Policies and Notices issued by said third parties at the web pages linked below.

On accessing the Website, therefore, the following third-party profiling cookies may be installed:

a) profiling cookies installed by Google Analytics, of which more details are available at <https://www.google.com/analytics/learn/privacy.html?hl=it>, where the Notice on safety and principles adopted by Google Analytics to protect user data can be found;

b) profiling cookies installed by Google, of which more details are available at <https://policies.google.com/privacy/update?hl=it&gl=it>, where the Notice on safety and principles adopted by Google to protect user data can be found;

(c) profiling cookies installed by Twitter, of which more details are available at <https://help.twitter.com/it/rules-and-policies/twitter-cookies>, where the Notice on safety and principles adopted by Twitter to protect user data can be found.

Because of the impact that this type of cookies, including third-party cookies, may have on the user's private sphere, Article 122 of the Personal Data Protection Code provides that the Data Subject's legitimate consent shall be obtained, firstly by displaying a banner in the foreground when he or she

accesses the Website, and secondly by informing the Data Subject that he or she can read the Extended notice on cookies either provided by the Data Controller or by third parties, depending on the party who installed the profiling cookies.

For such reasons, on accessing the Website, the Data Subject is shown a banner in the foreground which specifically informs him or her that cookies are being used and it is therefore necessary to read the relevant Privacy Notices, including this Extended Notice on cookies, so as to become acquainted with the information they carry.

It is important for the Data Subject to acknowledge that, navigating on the Website, they give their consent to cookies usage, including profiling cookies. However, it is always possible to modify the cookies preferences, even disabling some or all the categories of cookies mentioned above. This can be done by managing cookies from the browser settings, as per the instructions made available by the browser's manufacturer. (Please find below the links to the dedicated pages of the most popular browsers; Directa does not take responsibility for any changes that may be made by the manufacturer: [Apple Safari](#); [Google Chrome](#); [Mozilla Firefox](#); [Microsoft Edge](#); [Microsoft Internet Explorer](#); [Opera Browser](#)). Once again, therefore, please note that if you use the Website without modifying the browser settings, you give your consent to any and all cookies used by the Website, so as to exploit its resources in full.

7. DATA PROCESSING MODES

The processing of personal data is carried out by means of the operations or set of operations listed in Article 4, paragraph 1, point a), of the Personal Data Protection Code and in Article 4, paragraph 1, point 2) of the Regulation (EU), and namely by means of collection, recording, organisation, keeping, interrogation, elaboration, modification, selection, retrieval, comparison, utilization, interconnection, blocking, communication, dissemination, erasure and destruction of data. Processing operations may be carried out using both paper and digital data banks, and with or without the help of automated or electronic means.

Personal data is processed in a manner that ensures respect of the principles of lawfulness, fairness, transparency, data minimisation, accuracy, storage limitation, as well as accountability, which are set forth in Article 5 of the Regulation (EU) and in Article 11 of the Personal Data Protection Code. In addition, we ensure compliance with the personal data protection and safety measures laid down by the legislation in force.

8. CONSENT OR DENIAL TO DATA COLLECTION

The Data Subject's consent is optional for the purposes of marketing and navigation of the Website, whilst it is mandatory when the Data Subject sends information and/or contact requests, to allow Directa Plus to fulfill those requests. Consequently, if the Data Subject denies the consent to processing of personal data, he or she will be free to navigate the Website, but no contact and/or information requests on his or her part shall be considered or fulfilled.

For the consent to the categories of cookies which may be installed on the Data Subject's terminal equipment as well as the methods of processing data, please refer to Article 6 of this Notice for the Extended Notice on cookies.

9. DATA SUBJECT'S RIGHTS

Pursuant to Article 7 of the Personal Data Protection Code and Articles 15 to 21 of the Regulation (EU), the Data Subject shall be entitled to exercise specific rights, including:

- a) the right to obtain from the Data Controller the confirmation of the existence, or lack thereof, of his or her own personal data, access to them and information regarding them;
- b) the right to receive the personal data concerning him or her in a structured and machine-readable format, and the right to disclose those data to another Controller (right to data portability), in the cases provided for in Article 20 of the Regulation (EU);
- c) the right to be provided with a proper Notice pursuant to Article 13 of the Personal Data Protection Code and to Article 13 of the Regulation (EU);
- d) the right to obtain from the Controller the updating of data, the rectification of inaccurate data or the integration of incomplete data, the transformation into anonymous form and the blocking of data processed in violation of law, as well as restriction of processing, in the cases provided for in Article 18 of the Regulation (EU);
- e) the right to object, on legitimate grounds, to processing of personal data concerning him or her;
- f) the right to withdraw at any time his or her consent to processing of data concerning him or her, insofar as processing is based on his or her consent for one or more specific purposes and concerns common personal data, or special categories of data (e.g. sensitive data), without prejudice to the lawfulness of processing based on consent given prior to withdrawal;

To exercise the aforementioned rights, please send a specific request to the Data Controller or the Data Processor, through the channels and at the contact addresses referred to in Article 1 of this Notice.

The Data Subject shall also have the right, pursuant to Article 77 of the Regulation (EU), to lodge a complaint with a supervisory activity (the Italian Data Protection Authority at www.garanteprivacy.it) if he or she considers that the processing of personal data concerning him or her infringes the laws in force.

10. CHANGES

The Data Controller reserves the right to make changes, additions and/or updates, wholly or in part, to this Notice. Please note that it is necessary, for each Data Subject, to periodically review this page so as to have full knowledge of the latest updates to Directa's Privacy and Cookie Policy.