Information under art. 13 of EU Regulation 2016/679 on the protection of natural persons about the processing of personal data and on the free movement of such data (GDPR)

Dear User,

As required by law, we will process your personal data in a fair, transparent and traceable manner, while protecting your privacy and your rights.

Pursuant to Article 13 of the GDPR 2016/679, we are accordingly providing the following information.

The Data Controller is Rachelli, a single limited liability company under Italian law. Its headquarters is located in: Via Leonardo da Vinci n. 10 – 20016 Pero (MI) – Italy, phone +39 02 38.100.444, and email: privacy@rachelli.it.

A. Source of personal data and Data Controller

This document has been prepared pursuant to art. 13 of EU Regulation 2016/679 (hereinafter: "Regulation") to allow you to know our policy on the protection of personal data. In fact, this section describes the general procedures in which the personal data of site users and cookies are processed and how your personal information is handled when you use our site (hereinafter "Site"). The information and data provided by you or otherwise acquired as part of the use of the services of Rachelli - such as newsletters, hereinafter "Services" - will be processed in accordance with the provisions of the Regulations and confidentiality obligations that inspire the activity of Rachelli.

According to the rules of the Regulation, the processing carried out by Rachelli will be based on the principles of lawfulness, correctness, transparency, limitation of purposes and storage, minimization of data, accuracy, integrity and confidentiality.

The Data Controller of the processing carried out through the Site is Rachelli, as defined above, to whom you can write for any information regarding the processing of personal data to the following address: privacy@rachelli.it (please note that any e-mail sent to this address not related to privacy will be deleted).

This information is provided only for this Site and not for other websites that may be consulted by the user through links. Please refer to any specific sections of the Site where you can find specific information and any requests for consent for individual treatments.

Rachelli does not collect personal data relating to Customers under eighteen years old. We therefore ask minors not to proceed with the insertion and communication of their data and to have the necessary procedures carried out by persons of legal age.

A. Nature of the data processed

Following navigation within our Site, Rachelli will process the following personal data (art. 4(1) of the Regulations) hereinafter only "Personal Data":

1. Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users connecting to the Site, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters relating to the operating system and computer environment. These data are used only to obtain anonymous statistical information on the use of the Site and to check its proper functioning (see Policy on cookies), to identify anomalies and / or abuse, and are deleted immediately after processing. The data may be used by the competent authorities to ascertain responsibility in the event of hypothetical computer crimes against the Site.

2. Data provided voluntarily by the interested party

Apart from that specified for navigation data, the user is free to provide personal data contained in any request forms on the Website (eg. to activate newsletters, request information and / or reports on products, free registration, purchase, etc..). Failure to provide them could make it impossible to provide the service. In these cases, only the information necessary for the service requested will be requested.

In the use of some Services of the Site may occur a processing of Personal Data of third parties that you send to Rachelli. With respect to such cases, you are the independent data controller, assuming all the obligations and responsibilities of the law. In this sense, you hereby indemnify us from and against any and all claims, demands for compensation for damage caused by processing, etc. that may be made to Rachelli by third parties whose Personal Data have been processed through your use of the functions of the Site

in violation of the applicable data protection regulations. In any case, should you provide or otherwise process Personal Data of third parties in the use of the Site, you warrant from now on - assuming all related liability - that this particular case of processing is based on an appropriate legal basis pursuant to art. 6 of the Regulation that legitimizes the processing of the information in question.

3. Cookies

What are cookies?

Cookies are small text files that the sites visited by users send to their terminals, where they are stored to be retransmitted to the same sites on subsequent visits. Cookies are used for different purposes, have different characteristics, and may be used both by the owner of the site you are visiting and by third parties. The Site may contain links to other websites that have their own privacy policy that may be different from that adopted by www.rachelli.com and therefore not responsible for these sites. Below you will find all the information about the cookies installed through this site, and the necessary information on how to manage your preferences regarding them.

Cookies used by this site

Cookies relating to activities strictly necessary for the operation of the site and the provision of the service:

- This site uses the site session cookie generated by applications based on the PHP language. This identifier is used to maintain user session variables.

Anonymous analysis cookies:

- This website uses Google Analytics cookies with an anonymised IP duration of one year. They are defined as anonymous because they cannot be used to identify specific individuals. More specifically, www.rachelli.com uses GoogleAnalytics (Google, Inc.), which generates cookies in the manner described in the General Privacy Policy document and the specific document on the use of information collected with Google Analytics. Google will not associate your IP address with any other data held by Google. The terms of service to which all customers of the program must adhere prohibit the monitoring or collection of personal information (personally identifiable information, such as name, email address, billing information or other data that may reasonably be linked to such information) through the use of Google Analytics or the association of this information to information on the analysis of web data. These cookies serve statistical purposes only and collect information in aggregate form only. Personal data collected: Cookies and usage data.

Place of processing: USA - Privacy Policy - Opt Out

All technical cookies do not require consent, so they are automatically installed after you access the site.

Remember that you can also manage your cookie preferences through your browser

If you do not know the type and version of browser you are using, click on "Help" in the browser window at the top of the page, from where you can access all the necessary information. If you know your browser, click on what you are using to access the cookie management page. Google Chrome, Mozilla Firefox, Apple Safari and Microsoft Windows Explorer.

Useful links

For more information about cookies and their use on the Internet, you can find the following useful links:

www.allaboutcookies.org

www.microsoft.com/info/cookies.mspx

www.google.com/intl/it_en/analytics/privacyoverview.html

A. Purpose of treatment and legal bases

- 1. The processing of personal data of natural persons, identifying and non-sensitive, that the Owner intends to carry out, without your explicit consent, has the following purposes:
- provision of Site Services: the treatment is necessary for the execution of a contract of which the person concerned is a party or the execution of pre-contractual measures taken at the request of the same through the request for information on any supplies of products and / or commercial information relating to our business, our products, offers and promotions by filling out the contact form on our website (art. 6(1)(b) of the Regulation);
- personnel selection [link to specific information for personnel selection]: the treatment is necessary for the execution of a contract of which the person concerned is a party or for the execution of pre-contractual measures taken at the request of the same (art. 6(1)(b) of the Regulation) in addition to the pursuit of the legitimate interest of the Owner to be able to make a selection with regard to personnel to be included in the company through a comparison of personal profiles, training and employment candidates;

- necessary for the legitimate interest of Rachelli, for example to manage relations with the user and to improve the services offered, as well as to carry out direct marketing activities.

The provision of Personal Data for these purposes is optional but failure to provide it will make it impossible to activate the Services provided by the Site or will not allow you to use the Contact Form to send requests.

2. Secondly, the Owner may process the personal data you provide by filling out the Contact Form, with your explicit consent, for marketing purposes by sending by e-mail promotional newsletters and / or invitations to events which are part of the Owner or organized by the latter and / or parent companies / subsidiaries and / or related.

In relation to this latter purpose, it should be noted that the provision of personal data is optional. You may therefore decide not to provide any data or subsequently deny the possibility of processing data already provided: in this case, you may not receive e-mail invitations to events and / or promotional newsletters. In any case, you will continue to be entitled to the Services referred to in paragraph 1.

A. Recipients of personal data

Your Personal Data may be shared, for the above purposes, with:

- persons authorised by Rachelli to process Personal Data necessary to carry out activities strictly related to the provision of Services, who are committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and system administrators).
- third parties who may be involved in the management of the Site and who typically act as Data Processors (the complete and updated list of Data Processors is available on request via the appropriate email)
- persons, entities or authorities to whom it is mandatory to communicate your Personal Data under the provisions of the law or orders of the authorities.

A. Transfers of Personal Data

Some of your Personal Data is shared with Recipients who may be located outside the European Union. Rachelli ensures that the processing of your Personal Data by these Recipients is carried out in accordance with the Regulations. Indeed, transfers may be

based on an adequacy decision, the Standard Contractual Clauses approved by the European Commission or another appropriate legal basis.

A. The rights of the interested party

According to articles 15 and following of the Regulation, you have the right to ask Rachelli at any time,

- access to personal data: art. 15;
- the rectification or updating of the same: art. 16;
- the cancellation of personal data processed (right to be forgotten): art. 17;
- the limitation of the processing of data concerning you: art. 18;
- the portability of the data provided: art. 20.

He also has the right to oppose the treatment according to art. 21 and not to be subjected to automated decision-making processes (art. 22).

In any case, you always have the right to revoke any consent given and to lodge a complaint with the competent Control Authority (Guarantor for the Protection of Personal Data - Piazza di Monte Citorio n. 121, 00186 Rome), pursuant to art. 77 of the Regulation, if you believe that the processing of your Personal Data is contrary to the legislation in force.

Requests should be addressed in writing to the Data Controller at the following address:

Rachelli S.r.l. - Privacy Service - Leonardo da Vinci n. 10 - 20016 Pero (MI) or by e-mail to privacy@rachelli.it (we inform you that any e-mail sent to this address not related to the protection of personal data will be deleted).

A. Amendments

This privacy policy is in force from 25 May 2018. Rachelli reserves the right to modify or simply update the content, in part or in full, also due to changes in the applicable legislation. Rachelli will inform you of these changes as soon as they are introduced and they will be binding as soon as they are published on the Site.

Rachelli therefore invites you to regularly visit this section to learn about the most recent and updated version of the privacy policy so as to be always updated on the data collected and the use that Rachelli makes of it.

A. Data Retention

We inform you that the personal data that will be sent to the emails on this site, will be deleted after having complied with the purposes for which they were transmitted.

Specifically:

- 1. for information requests, the data will be stored within our systems for 3 months, after which time it will be deleted from all our databases;
- 2. for the request of specific information on the protection of personal data, such data will be stored within our systems for 3 months, after which time it will be deleted from all our databases:
- 3. for the purposes of marketing and sending promotional newsletters and/or invitations to promotional events to which the Owner is a party or organised by the Owner and/or by parent/subsidiary and/or related companies, such data, with your consent, will be kept for 24 months, after which it will be deleted from all our databases.

Viewing content from external platforms

These services allow you to view content hosted on external platforms directly from the pages of this Application and to interact with them. If such a service is installed, it is possible that, even if Users do not use the service, it collects traffic data relating to the pages on which it is installed.

Google map widget (Google Inc.)

Personal data collected: Cookies and usage data. Place of processing: USA - <u>Privacy</u> <u>Policy</u>