

## Personal data processing policy

The company IMAC S.p.A., based in Montefiore dell’Aso, Via Menocchia 27, with VAT No. 00985500446, as data controller

HEREBY INFORMS

both registered and unregistered users who connect to the website PRIMIGI<sub>2</sub>, that the personal data collected by the company, acquired by third parties or spontaneously granted by the data subjects, shall be processed in a lawful and correct manner, in accordance with the principles set out by EC and Italian law. The main rules that regulate the personal data processing are the European Regulation 679/2016 and the Legislative Decree 196/2003, as modified by the Legislative Decree 101/2018.

Joint controller of the processing is the company Reda Retail Spa, in accordance with the joint controllership agreement which regulates tasks and responsibilities relating to the processing.

In order to guarantee an independent control on the effective application of the regulations in force for the protection of the natural persons in regard to the processing of their personal data, the Data Controller has appointed a Data Protection Officer pursuant to art. 37 of EU Reg. 679/2016, who can be contacted at [dpo@imac-italia.it](mailto:dpo@imac-italia.it).

### Definitions

<i>Data subject</i>	Natural person to whom the data processed by the controller or the officer belong.
<i>Controller</i>	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.
<i>Officer</i>	The natural or legal person, public authority, agency, or other body which processes personal data on behalf of the data controller on the basis of a contract governing the conditions of the entrusting.

### Purposes of the processing

The processing activities of the data collected through the website are carried out by the Data Controller at the company's offices, in compliance with the security measures and requirements set out by European Regulation 679/2016, by parties appointed or delegated by it (duly selected and equipped of the necessary professionalism), with manual and computerized procedures.

The collected data are used to:

- allow the user a simple and rewarding browsing experience.
- collect useful elements to improve the offer of products and services via the web.
- execute specific requests from the data subject.
- for pre-contractual and contractual obligations, which may concern purchases made through the website in the countries where the e-shop is active, requests to open a Primigi brand shop, requests to be assessed for possible hiring.
- for ordinary administrative, financial and accounting activities linked to purchases and services provided through the website.
- to manage customer requests during the marketing and sale of the products or the provision of after-sales assistance services.
- for compliance with legal obligations or requests from the Authorities.
- for processing of statistics in anonymous form or following a de-identification process.

The processing of the data subject's personal data is also possible, with his/her express and specific consent, for the following purposes:

- General commercial communication (marketing)
- Sending information to the data subject about products and services he/she has shown interest in (direct marketing)
- Analyses of tastes, preferences and purchasing habits (profiling) in the countries where the e-shop is available.
- Surveys about the satisfaction degree of the data subject
- Issuing of Fidelity card.

- Participation in games, contests, or prize draws
- Involvement in events and exhibitions
- For market research and other activities directly and indirectly ascribable to marketing activity and to after-sales service

The functions dedicated to the electronic commerce (e-shop) may not be available or only partially available in some countries. In this case, the information provided in this document which exclusively concerns this part of the PRIMIGI website is not applicable or is applicable to the available functions.

#### Data subject to processing

<i>Browsing data</i>	General	IP address, operating system and browser used for browsing, date and time of connection and disconnection, time spent on the website, visited pages, carried out activity, location (if the relevant service is active) and any other information made available or transmitted by the device of the data subject, based on the chosen security settings
<i>E-shop data (in the countries where it is available)</i>	General	Data relating to surfing on the pages of the online shop, from the searches carried out, to the products displayed, to the products added to the cart, to the products removed from the cart to the products purchased, to the payment systems used
<i>Profile data linked to the Fidelity program</i>	General	Name, surname, e-mail address, billing address, shipping address, mobile number, purchase history, points collected, vouchers received and used, wish list
<i>Contact form</i>	General	Name, surname, e-mail address, other data sent by the data subject via the subject and message's fields
<i>Newsletter Registration form</i>	General	Email address of the data subject
<i>Work with us</i>	General, Specific	Name, surname, e-mail address, telephone number and mailing address, educational background, and previous work experience, as well as any other information useful for the selection of employees and the possible establishment of an employment relationship (among the data forwarded by the data subject with the CV there may be specific data connected to the pursued purposes)
<i>Partnership</i>	General	Name, surname, e-mail address, telephone number and mailing address, city of interest for the opening of the point of sale, square meters of the shop, other information useful for the possible establishment of the commercial collaboration relationship sent to the company by the data subject while filling in the contact form.

Filling in the forms on the website to receive information on products and services involves the acquisition of the data subject's data in the Data Controller's computer system. The information is protected by an authentication system and can only be accessed by those in possession of the access credentials.

In other cases, the procedure generates an email message addressed to the Data Controller, which is verified based on the requests of the data subject. Communications via email or mobile phone involve the storage of the email address and mobile number of the data subject, necessary to reply to the sender's requests. The data stored in the message are included.

The Data Controller suggests not to submit personal data or information concerning third parties, unless absolutely necessary, and also to limit the submission of one's own data to what is strictly necessary for the activity performed or requested.

#### Data concerning minors

The website is not structured to process data of minors (except for models' images, objects of specific authorizations by parents). The Data Controller shall not be responsible in any way for any false statements that may be provided by children and, should it ascertain the falsity of said statements, it shall immediately delete all personal data and any information acquired.

#### Nature of the provision

The processing of contact data is essential to satisfy the requests of the data subject and fulfil contractual obligations. The provision is therefore **necessary**, otherwise the processing cannot take place. Any incorrect or insufficient communication of the requested data may result in the total or partial impossibility of executing the data subject's requests and the possible mismatch of the results of the processing with the agreements entered into or with the obligations imposed by rules and regulations.

Further information may be **necessary** for the purposes of employees selection (professional training, previous work experience) and business collaboration (previous work experience, financial solvency). Other data, however, are collected for the sole purpose of adapting browsing, promotional campaigns, offers, production and stocks, as well as, in general, company activity to customers' tastes and interests. Their provision, therefore, is **optional** and any refusal to process or withdrawal of the already given consent does not prejudice the establishment and continuation of the main relationship.

Imac Spa shall not be responsible for any data collected by third parties through links and other connections to external resources, for which it is the data subject's responsibility to consult the related information and possibly deny or revoke consent to processing.

**Legal basis** of the processing made by the Data Controller are the compliances related to pre-contractual and contractual stages of the relationship, the obligations imposed by the law, the legitimate interests of the Data Controller to manage the necessary data to improve the offering of products and services, the express consent of the data subjects. It is possible to request the Data Controller to specify the legal basis of each processing.

#### **Data retention times**

The data processed by the Data Controller, notwithstanding its legal obligations, shall be kept until the express request for deletion by the data subject and, in any case, periodically verified, including with the use of automatic procedures to ensure the updating of said data and the effective compliance with the processing purposes. If the purpose for which they were acquired is no longer applicable, or in case of the data subject's express request, the data shall be deleted, unless they are to be processed to respect regulatory obligations, to guarantee a legitimate interest of the Data Controller or to protect rights in court. On completion of the processing and following deletion, the data subject's rights can no longer be exercised.

The maximum term currently detected in the company is 10 years due to the retention obligations dictated by tax and accounting regulations. Information on the terms of other specific processing can be requested from the Data Controller by exercising the right of access.

#### **Browsing data**

During their normal functioning, the IT system and software used for the corporate website acquire certain personal data, the submission of which is implicit in the use of Internet communication products: IP addresses and domain names of the computer used by the user to connect to the website, the URL (Uniform Resource Locator) addresses of the requested resource, the time of the request, the method used to send the request to the server, the size of the file received, the numerical code used to specify the status of the response provided by the server (executed or error, etc.) and other parameters related to the user's operating system and computer. This information cannot be stored to identify the data subjects but, by their nature, can, through processing and association with other data, enable the user to be identified.

These data are used only to create anonymous statistics on the use of the website and to check its correct functioning. They are normally deleted immediately after processing. They can be used and provided to law enforcement agencies and to the judiciary to ascertain responsibility in the event of damage to the website or offences perpetrated via the network.

#### **Cookies**

Some information regarding browsing is stored on the customer's computer and read by the system at the next connection. This file, called cookie, does not contain personal data, given that it does not enable the user to be specifically identified, but they can allow it through the association with other data. The information collected in the manner show the frequency of visits to a website and the activity carried out during browsing. In this way, over time, it is possible to improve the contents of the website and facilitate its use.

Even companies that submit contents to the website, or whose websites can be accessed via link, may use cookies when the user selects the relevant link.

In these cases, the use of cookies is not under the direct control of the Data Controller. Most browsers automatically accept cookies, but it is possible to reject them or select only a few of them, according to the preferences set by the user. However, if the user prevents the uploading of cookies, some components of the website may stop working and some pages may be incomplete.

<p><b>Essential technical cookies</b></p>	<p>These cookies are necessary to ensure the website's correct and smooth operation: they enable pages to be browsed, the sharing of content, the storing of access credentials to speed up entry to the website, to keep preferences and credentials active during browsing and to improve the browsing or purchasing experience. Without these cookies is not possible to fully or partially provide the services for which the users access the website.</p>
<p><b>Statistical cookies</b></p>	<p>These cookies enable an understanding of how users use the website to be able to then assess and improve its operation and to create more content that is more appropriate to users' preferences. These cookies provide an understanding of which are the most commonly and less frequently visited, how many visitors are visiting the website, how much time is spent on the website by the average user and how visitors arrive at the website. In this way, it is possible to identify the optimal operations and most welcomed content and how the content and operation of the pages can be improved.</p>
<p><b>Analysis cookies</b></p>	<p>They are used to keep track of the searches carried out by the user to be able to submit products and services that comply with previous browsing and searches. They are normally used for remarketing operations, through which the advertising related to previous research and similar products and services is conveyed to the user while browsing.</p>
<p><b>Profiling cookies</b></p>	<p>These are suitable tools for storing the choices made by the user during browsing and researching, to create personal profiles capable of classifying and cataloguing tastes, preferences, browsing and using habits. Through the generation of these profiles, the user's browsing experience can be improved and oriented towards one's preferences, ability, and possibility of purchasing or using services. They can be deactivated without creating any obstacle or impediment to browsing.</p>

<b>Third-party cookies</b>	<p>These are cookies used by third parties that are not directly controlled by the Data Controller. The company cannot provide guarantees regarding the use that will be made of the data, the processing of which is directly operated by an external party.</p> <p>Cookies from these third-party operators offer advanced features, as well as more information and personal functions, including the possibility of sharing content through social networks and having a personalised experience of the website, based on preferences expressed through the pages visited.</p> <p>If you use the services of said other data controllers, they may be able to know that the user has visited the company's website. The use of data collected by these external operators through cookies is subject to their privacy policies. Third-party profiling cookies are identified with the names of the respective operators and can be deactivated.</p>
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The updated list of cookies is visible in the section "Cookie report" of the website.

### **Managing cookies**

By selecting the options made available by the banner appearing in the main page of the website [www.primigi.it](http://www.primigi.it), it is possible to choose which cookies to install, except for the ones necessary for the website's correct operation, without which viewing contents would not be possible. The selection can be revoked at any time by using the specific function of the banner or through the options of the program used to surf the internet.

It's always possible to prevent the installation of unnecessary and third-party cookies and to remove previously installed cookies, without affecting the website operation. To adjust or change the browser settings, the software or application manufacturer's guide must be referred to. Further information on used cookies can be requested directly to the Data Controller of the processing.

### **Third-party websites**

The website, even only periodically, may contain links to third-party websites and applications (Google AdWords, Analytics, YouTube, Vimeo, podcast etc.), to provide the user with additional services and information. When the user uses these links, he or she leaves the company website and accesses other resources that are not under the direct control of the Data Controller, which, therefore, shall not be responsible for browsing-related procedures, the security and processing of personal data operated by the other websites, even in the presence of co-branding or even if the company logo is displayed. A careful examination of security and confidentiality procedures of the visited website is recommended, given that the website may transmit additional cookies, read those already present on the user's hard drive and request/acquire further personal information.

### **Newsletter management services**

The newsletter, if present, is managed by a software that uses a database of email addresses and mobile numbers to send notification to the registered users (via the specific section of the website), which also provides for an automatic deletion procedure which the data subject can use independently, referred to by each notification submitted by this application.

### **Employee recruiting form**

Through the form available on the website for sending CV, the Data Controller acquires the necessary information for a first assessment of the candidate, to examine the actual correspondence to the position he should hold in the company and possibly for inviting him/her to an interview.

Generally, to evaluate the candidate in regard to the position he/she will have to hold, all the necessary information is extracted from the CV (name, surname, mobile number, mailing address, email address, educational level, and previous job experiences). No longer necessary data are immediately removed, and the related paper support destroyed.

### **Partners and franchisees' research form**

The forms available on the website acquire the necessary information for a first assessment of the business partner and the current carried-out activity, in order to make a selection before proceeding with the contract stipulation interviews.

### **Interaction with social networks and external platforms**

The website, via widgets and buttons, can interact with external platforms and social networks. In this case, the information acquired depends on the settings of the profiles used by the user on each social network and not by this website's administrator.

Facebook's "Like" button, Twitter's "tweet" button, LinkedIn's "Post" button, etc., enable pages or topics of the website to be shared with the respective social platforms and acquire the data subject's data. It's the data subject, therefore, that via the social profile shares information taken from the website of Data Controller and, at the same time, provides further data to the social network controller.

Additional information can be acquired through the websites of the companies providing the service. In this case, data are not managed by the website of the Data Controller, which links these buttons only to provide the data subject with an additional service but has no control over them.

### **Automated decision-making processes**

The Data Controller do not use automated decision-making processes. These might be used, at certain periods of the year or coinciding with the execution of specific contracts, by business partners to which have been entrusted statistics and behavioural analyses services, including profiling, to whose information please refer for additional details. Further information, both on the identity of the business partner and on the carried-out automated operation can be requested to the Data Controller of the processing.

### **Communication and dissemination**

The data processed via the website are exclusively of a common nature and are not intended for dissemination. The Data Controller does not require and has no interest in collecting and processing data classified by the Regulation EU 679/2016 as "specific" (medical, genetic, biometric, etc.) or "criminal", notwithstanding its legal obligations and the acquisition of CV via the section "Work with us" or when sent directly by the interested parties via email (which will, in any case, be processed in compliance with the rules on the management of the existing or potential employment relationship and deleted by professionals where not necessary).

Data must be transferred to third parties, who may assume, based on the type of relationship, the role of data controller pursuant to art. 28, EU Reg. 679/2016 or mere recipients of the communication, in the fulfilment of obligations resulting from laws or regulations (Institutions, Law Enforcement Agencies, Judicial Authorities, etc.) or for activities directly or indirectly associated with the relationship established. This includes, by way of example, but is not limited to, the following:

- Parties that need to access the data of the data subject for purposes associated with the relationship with the Data Controller (marketing agencies, website development, fidelity card management, related services).
- Credit Institutions, Insurance agencies, Financial Intermediaries, Electronic Money and Payment Management Institutions, Debt Collection Companies, Customer Verification Companies, communication companies, business partners, as necessary to guarantee the website's payment services and the processing of orders and refunds.
- Consultants, collaborators, service companies, within the limits necessary to carry out the task assigned by the Data Controller, for the activities related to the services provided by the website.
- Subsidiaries and/or associated companies that may access the data, within the limits strictly necessary to carry out tasks assigned by the Data Controller, for the activities related to the services provided by the website.
- Post offices, couriers, carriers, for deliveries and returns of goods.

The updated list of data controllers is available at the Data Controller's headquarters.

### **Data transfer abroad**

Data whose provision has optional nature may, within the limits of the subscribed consent or of the contractual agreements entered into by the Data Controller, be transmitted to subjects operating within the European Economic Area or in countries that guarantee the same level of protection required by the European Regulation 679 /2016, according to the standard contractual terms approved by the European Commission.

## **Rights of the data subject**

Data subjects are entitled to the rights referred to in Articles 15 to 22 of the GDPR 679/2016. In detail, the data subject has the right to access to his or her data (art. 15) and request correction, updating, supplementing (art. 16) and deletion (art. 17), limitation of use from the Data Controller (art. 18), to obtain a copy in a structured format, commonly used and readable by an automated device (art. 20), to oppose the processing if the conditions are met (art. 21 and 22).

The rights can be exercised within the limits in which the processing is mandatory for legal or regulatory provisions. Requests relating to exercising the rights of the data subject can be addressed to the Data Controller at the following address: [privacy@imac-italia.it](mailto:privacy@imac-italia.it). If the data subject is not satisfied with the Data Controller's or Data Protection Officer's reply to his or her requests, may make a complaint to the Personal Data Protection Authority, based in Rome, Piazza Venezia no. 11, [www.gpdp.it](http://www.gpdp.it).

Citizens of another member state of the European Union have the right to contact the supervisory authority of their country.

### **Notice**

The Data Controller periodically modifies this document, to adjust it to the carried-out processing and to the legislative and regulatory requirements. It is always advisable for the Data subjects to view it to stay updated.