

PRIVACY POLICY

Version 2.1 - MARCH 2024

EBANO SPA ("**Company**") provides you with the following information regarding the processing of your personal data as a Visitor, in accordance with Article 13 of EU Regulation 2016/679 (commonly known as GDPR).

"Processing of Personal Data," in simple terms, refers to any operation involving any "information relating to an identified or identifiable natural person." For example, a first and last name, or an email address with a username that identifies you (e.g., mariorossi@....), is considered "Personal Data," and actions such as collecting, recording, and using it to send you a communication are considered "Processing" activities; similarly, sharing the Data with other organizations or storing it.

Our organization is defined as the "Data Controller," meaning we are the entity that determines how and for what purposes information related to natural persons is processed.

You, as the "natural person to whom the Personal Data refers," are defined as the "Data Subject," and you have the right to receive information about who we are, what personal data we process, why, how, and for how long we process it, and what rights and obligations you have in relation to it. Depending on whether you are merely a Visitor or wish to use the Services provided through the Site (and therefore become a User), we collect and/or need you to provide certain Data, which is necessary to allow you to browse the Site and/or receive responses to your requests and/or make use of our services.

The website of the Italian Data Protection Authority contains further useful information to better understand the subject (see, for example: <http://www.garanteprivacy.it/home/diritti>).

The definitions of the terms and expressions used can be found in the Glossary at the bottom of this page. For certain terms with an initial capital letter that are not defined here, please refer to the glossary attached to the [Terms and Conditions](#); in the event of any conflict between definitions, for the purposes of this Privacy Policy, the definitions in the Glossary (at the bottom of the page) will take precedence over those contained in the Terms and Conditions.

Who are we ("Data controller")?

EBANO SPA, with its registered and operational office at Via Enrico Mattei, 21 - 28100 Novara (NO) - Tax Code 08695300155 and VAT number 01735720037 (hereinafter also referred to as the "**Owner**" or "**Company**").

Why do we process Personal Data (Purpose) and what is the basis for processing (Legal Basis) for each category of Data?

n.	Aims	Categories of Personal Data	Lawful basis
	To analyze traffic on the Site (e.g., detect the most visited pages, the number of visitors by time range or day, geographic origin, average connection time, browsers used, visitor origin—whether from search engines or other sites—, searched phrases and keywords, etc.) to understand how the Site is used, manage, optimize, and improve it, or even just for statistical purposes; to resolve operational issues (e.g., page loading anomalies); to perform monitoring activities to prevent and/or fend off cyberattacks and fraud; to analyze user composition to improve the Site and/or Services.	Navigation Data, anonymous information (which does not allow us to trace your identity), and common Personal Data (e.g., full IP address)	The necessity of providing access to the Site in accordance with the Terms of Use in effect at the date of access (Art. 6 § 1.b GDPR)

	To fulfill the requests of the Visitor and/or User regarding the Site and our activities, received by any means (e.g., via email).	Common Personal Data	The necessity to adopt pre-contractual measures at the request of the Visitor and/or User (Art. 6 § 1.b GDPR)
	To display the Site and services on the web and perform all related and/or connected activities to the Site and/or Services (e.g., implementation and maintenance of records and archives, handling requests, sending technical, organizational, contractual, and informational communications regarding services; e.g., welcome messages, service disruptions, periodic reports on viewed content, activation or expiration of potential premium services).	Common Personal Data	The necessity to make the Site available in accordance with the Terms of Use in effect at the date of access (Art. 6 § 1.b GDPR)
	To carry out commercial communications from the Company and on behalf of third-party partners ("Direct and Indirect Marketing"), including through the Newsletter, without transferring Data to these third parties.	Common Personal Data (email address)	The necessity to execute the Terms and Conditions of the Newsletter Service (Art. 6 § 1.b GDPR)
	To allow the Company's Partners to pursue marketing purposes by sharing or making the Data available to them.	Common Personal Data (email address)	The consent of the Visitor and/or User (freely given and revocable at any time) - Art. 6 § 1.a GDPR
	To comply with obligations under applicable law (e.g., accounting and tax, compliance, security, etc.) and/or to execute orders issued by authorities.	Common Personal Data	The necessity to comply with legal obligations to which the Company is subject - Art. 6 § 1.c GDPR
	To establish, exercise, and/or defend a right in relevant legal venues.	Common Personal Data	Our legitimate interest in defending a right of the Company - Art. 6 § 1.f GDPR

To whom do we communicate the Data (Categories of Recipients)?

Purposes, based on Applicable Law and/or a contractual agreement with the Data Controller, Data may be communicated to:

1. Entities necessary for the execution of activities related to and arising from the management of the Site and the provision of Services, acting as Data Processors (e.g., IT service providers, etc.), who are bound by confidentiality and compliance with Privacy Regulations;
2. Individuals authorized by us (e.g., our employees), who are committed to confidentiality or subject to a legal obligation of confidentiality;
3. Consultants and/or professionals appointed by us, who may act as independent Data Controllers;

4. External organizations necessary for the execution of activities related to and arising from the performance of the Site's Terms of Use, acting as Data Processors or independent Data Controllers (e.g., providers of IT, banking, insurance, shipping and transportation services, commercial agencies, accounting, tax, legal services, etc.);
5. Public organizations and Authorities, if and to the extent required by Applicable Law or their orders, or for the establishment, exercise, and/or defense of a right in judicial proceedings.

Do we transfer Personal Data outside the European Economic Area (EEA)?

Our suppliers use services provided by companies established outside the European Economic Area (United States) for the management and storage of data and content on the Site. In such cases, the transfer is carried out based on standard contractual clauses and supplementary measures to ensure data protection. Additionally, the use of certain social media platforms linked to the Site may involve the transfer of personal data outside the European Economic Area. In general, we ensure that data transfers occur only to countries that guarantee an adequate level of protection, for which there is an adequacy decision from the European Commission or based on one of the other safeguards provided under Chapter V of the GDPR. Further information on the transfer of personal data outside the European Economic Area (including references to the safeguards and the means to obtain information about them) is available by writing to the Company.

Do we carry out automated decision-making processes and/or Profiling activities?

No profiling activities of User data are active.

For how long do we retain the Data?

The maximum retention period for Personal Data for "contractual" purposes will not exceed ten years following the deletion of the User's registration, unless Applicable Law requires or allows us to retain them for a longer period to protect our rights and/or legitimate interests. We retain the Data of those who contact us for information through the addresses on the "Contact" page for a maximum of two years from the request (if they are not a User). We may process the Data for Direct and Indirect Marketing purposes. Navigation Data does not persist for more than seven days (unless it is necessary for the judicial authorities to investigate crimes).

Are you required to provide us with Personal Data?

Due to the functioning of the Internet, you cannot refuse the communication of Navigation Data; it is not possible to refuse the communication of certain Personal Data (such as the IP address of your device). However, you can refuse the installation of Profiling Cookies via the "banner."

What happens if you refuse to provide your Data?

Refusing the installation of Profiling Cookies does not have any consequences. However, to access certain services (such as the *WORK WITH US* section), the data must be provided and will be handled in accordance with applicable regulations.

What rights do you have as a "Data Subject"?

As the person to whom the data refers ("Data Subject"), you have the right to:

1. **Access the data** held by the Data Controller and request a copy, unless exercising this right infringes on the rights and freedoms of other natural persons;
2. **Request the rectification** of any incomplete or inaccurate data;
3. **Request the deletion** of the data, subject to exclusions or limitations established by Applicable Law (e.g., Article 17 § 3 GDPR);
4. **Request the restriction of processing**, if the conditions are met and subject to exclusions established by Article 18 § 2 GDPR;

5. **Request data portability** (i.e., to receive it in a structured, commonly used, and machine-readable format to be able to transmit it to another Data Controller without impediment), within the limits where the processing is based on consent or the necessity to perform a contract, where technically possible and unless exercising this right infringes on the rights and freedoms of other natural persons;
6. **Lodge a complaint** with the Italian Data Protection Authority (in Italy, www.garanteprivacy.it), or with the Data Protection Authority of the EU country where you habitually reside, work, or where the alleged violation occurred.

Right to Refuse / Withdraw Consent

You can object to processing based on consent (e.g., regarding Profiling Cookies and Profiling itself, insofar as it is related to Marketing purposes, and the communication of data to third parties for their Marketing purposes - purpose no. 5) by either not giving consent initially or withdrawing it later. (Please note that any subsequent withdrawal of consent does not affect the lawfulness of the data processing carried out prior to such withdrawal).

The exercise of the above rights may also be delayed, limited, or excluded in the cases provided for by Article 2-undecies of Legislative Decree 196/2003.

Who can you contact for questions or to exercise your rights?

You can send an email to privacy@gruppoebano.com or mail a letter to the following address: **EBANO SPA**, Via Enrico Mattei, 21 - 28100 Novara (NO).

The Data Controller has also appointed a Data Protection Officer ("DPO"), who is available for any privacy-related inquiries at the email address dpo@gruppoebano.com.

PLEASE NOTE:

1. **The information provided here applies exclusively to the processing of Personal Data collected through this Site. If you engage with us in a relationship that goes beyond mere browsing, requesting information, or using the services on the Site, you may be provided with additional and/or different information regarding the processing of personal data.**
2. **This Privacy Policy is effective from the date indicated in the header; we reserve the right to modify its content, in part or in full, as a result of changes in Privacy Regulations. We will publish the updated version of the Privacy Policy on the Site, and from that moment, it will be binding: you are therefore encouraged to regularly visit this section.**
3. **We do not intentionally collect personal information related to individuals who, under their national legal system, lack the legal capacity to enter into contracts. Should any information about such individuals be recorded, we will promptly delete it upon request from the Data Subject or those who exercise authority over them.**

GLOSSARY

- **“Supervisory Authority”**: The independent public authority established by a European Union Member State, or by the European Union itself, tasked with overseeing the application of Privacy Regulations (for Italy, this is the Data Protection Authority, “Garante per la Protezione dei Dati Personali,” <http://www.garanteprivacy.it>).
- **“Authority”**: A public or private entity or organization with administrative, judicial, police, disciplinary, or supervisory powers.
- **“Authorized Person”**: A natural person, under the direct authority of the Data Controller, who receives instructions from the Data Controller regarding the Processing of Personal Data, pursuant to and for the purposes of Article 29 of the GDPR.
- **“Privacy Code”**: Legislative Decree 196/2003 and subsequent amendments and/or additions (particularly by Legislative Decree No. 101/2018).

- **“Committee” or “EDPB”**: The European Data Protection Board, established by Article 68 of the GDPR and governed by Articles 68 to 76 of the GDPR, replacing the WP29 as of May 25, 2018.
- **“Communication”**: “Making personal data known to one or more specific entities other than the data subject, the controller’s representative within the territory of the European Union, the processor or their representative within the territory of the European Union, or authorized persons, pursuant to Article 2-quaterdecies, who process personal data under the direct authority of the controller or processor, in any form, including by making it available, consulting it, or through interconnection” (as defined in Article 2-ter, paragraph 4, letter a of the Privacy Code).
- **“Cookie”**: Short text fragments (letters and/or numbers) that allow a web server to store information on the browser for reuse during the same site visit (session cookies) or later, even after several days (persistent cookies). Cookies are stored, according to the user’s preferences, by the specific browser on the device used (computer, tablet, smartphone). The following categories are considered:

- **Technical cookies**: These are cookies that are essential for the proper functioning of the Site and are used solely for the purpose of "carrying out the transmission of a communication over an electronic communications network, or as strictly necessary for the provider of an information society service explicitly requested by the subscriber or User to provide such a service" (see Article 122, paragraph 1, of the Privacy Code).
- **Analytical cookies**: These cookies are used to collect and analyze traffic and usage of the Site in an anonymous manner. Although they do not identify the user, they allow, for example, the detection of whether the same user reconnects at different times. They also allow for system monitoring and performance and usability improvement. Deactivating these cookies can be done without any loss of functionality.
- **Profiling cookies**: These are persistent cookies used to identify (anonymously or otherwise) user preferences and improve their browsing experience.
- **Third-party cookies (analytical and/or profiling)**: These cookies are generated by organizations not belonging to the Site but are integrated into parts of the Site page. Examples include "widgets" from Google (e.g., Google Maps) or "social plugins" (Facebook, Twitter, LinkedIn, Google+, etc.).

"Navigation Data": These are data that the computer systems and software procedures used for the operation of the Site acquire during their normal operation, and whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, 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 the computers used by users connecting to the Site, the addresses in URI (Uniform Resource Identifier) notation of the 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 numeric code indicating the status of the server's response (successful, error, etc.), and other parameters related to the user's operating system and computing environment.

This data, necessary for the use of web services, is also processed for the purpose of: obtaining statistical information on the use of services (e.g., most visited pages, number of visitors by time slot or day, geographical areas of origin, etc.); verifying the proper functioning of the services provided.

"Personal Data": "Any information relating to an identified or identifiable natural person ('data subject'); a natural person is considered identifiable if they can be identified, directly or indirectly, particularly 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 their physical, physiological, genetic, mental, economic, cultural, or social identity," as defined in Article 4, paragraph 1, point 1 of the GDPR.

"Recipient": "A natural or legal person, public authority, agency, or another body to which personal data is disclosed, whether or not it is a Third Party," as defined in Article 4, paragraph 1, point 9 of the GDPR.

"GDPR": EU Regulation 2016/679 "on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)."

"Data Subject": "An identified or identifiable natural person," as defined in Article 4, paragraph 1, point 1 of EU Regulation 2016/679 (commonly referred to as "GDPR").

"Restriction": "The marking of stored personal data with the aim of limiting their processing in the future," as defined in Article 4, paragraph 1, point 3 of the GDPR.

"Regulation" or "Regulations": One or more sets of rules referred to in this document as Privacy Regulations and Applicable Regulations.

"Applicable Regulations": Any provision, of any level, belonging to Italian law or European Union law, in any way applicable to the Site and/or Services.

"Privacy Regulations": EU Regulation 2016/679 ("GDPR"), Legislative Decree 196/2003 and its subsequent amendments and/or additions ("Privacy Code"), as well as the measures adopted by the Supervisory Authority in execution of the tasks established by the GDPR and the Privacy Code, and any other applicable regulations, of any level, including opinions and guidelines issued by the Committee.

"Profiling": "Any form of automated processing of personal data consisting of the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements," as defined in Article 4, paragraph 1, point 4 of the GDPR.

"Publication": The action by which the Data Controller communicates information on the Site without implementing procedures that require the Visitor and/or User to view it.

"Processor": "A natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller," as defined in Article 4, paragraph 1, point 8 of the GDPR.

"Third Party": "A natural or legal person, public authority, agency, or body other than the data subject, the data controller, the data processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data," as defined in Article 4, paragraph 1, point 10 of the GDPR.

"Controller": "A 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," as defined in Article 4, paragraph 1, point 7 of the GDPR.

"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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction," as defined in Article 4, paragraph 1, point 2 of the GDPR.

"WP29": The Working Party on the Protection of Individuals with regard to the Processing of Personal Data, established by Article 29 of Directive 95/46/EC, whose tasks are set out in Article 30 of Directive 95/46/EC and Article 15 of Directive 2002/58/EC.