

INFORMATION PURSUANT TO ARTICLES. 13 AND 14 OF REG. (EU) 2016/679 ("GDPR")

Below is the information about the processing of personal data provided by filling out the online form "Order Request Form" (hereinafter, "Form") for the purchase of a Gift Card as well as for the top-up of the plafond, as better regulated in the relevant general terms and conditions of sale.

1. Identity and contact details of the data controller

The data controller is Amilon S.r.l., Fiscal Code and VAT number 05921090964, with registered office in via Natale Battaglia n. 12, Milan, e-mail address <u>privacy@amilon.eu</u> (hereinafter, "**Amilon**" or "**Data Controller**").

2. Contact details of the Data Protection Officer (DPO)

The DPO can be contacted at the e-mail address dpo-ext@amilon.eu.

3. Categories and sources of data processing.

The processing will concern personal data (e.g. name, surname, e-mail address) provided when filling in the Form and within the performance of the contractual relationship with Amilon.

Data may be collected directly from the data subject or from a third party who fills in the Form and/or manages the contractual relationship with Amilon.

4. Purposes of processing, legal bases and data retention periods

The data are processed:

a) for the handling of an order of gift cards using the Form or a request of a plafond top-up and in general for the management of the contractual relationship; for this purpose:

- the legal basis of the processing is the execution of a <u>contract</u> to which the data subject is a party, in the event that it acts as a legal representative of the customer company, or the <u>legitimate interest</u> with regard to the processing of the data of other persons related to the customer company, e.g. corporate contact person;

- data will be retained for the duration of the contractual relationship with Amilon and, as an ordinary limitation period, for 10 years thereafter;

b) send promotional communications about Amilon services / products similar to those requested through the Form to the e-mail address provided; for this purpose:

- the legal basis for the processing is the so-called "*soft spam*" referred to in art. 130, par. 4 of Legislative Decree 196/2003 (Privacy Code);

- data will be retained until the decision to opt-out (by clicking on the "unsubscribe" link in each message).

After the retention periods mentioned above have expired, the data will be destroyed, deleted or anonymized, subject to technical deletion and *backup* times.

5. Provision of data

The provision of data marked with an asterisk is necessary for the proper management of the request; therefore, failure to provide such data will not allow submitting the request.

6. Categories of data recipients

Data may be communicated to third parties operating as autonomous data controllers, such as, e.g. public authorities and professional firms, entitled to process them.

Data may also be processed, on behalf of the Data Controller, by third parties, designated as data processors pursuant to art. 28 of the GDPR, who carry out activities functional to the above purposes, e.g. IT service providers, marketing and communication companies.

Moreover, data are processed by Amilon employees (belonging to the company departments in charge of pursuing the abovementioned purposes) who have been expressly authorized to process them and have received adequate operating instructions.

7. Rights of data subjects

The data subject (i.e. the person to whom the personal data refer) may exercise its rights under Articles 15-22 of the GDPR, by sending a communication to the contact points indicated in par. 1. In particular, he/she can obtain from the Data Controller confirmation as to whether or not personal data concerning him/her are being processed and, if so, access to the same and to the information referred to in art. 15, rectification of inaccurate data, integration of incomplete data in accordance with art. 16, cancellation of data in the cases provided for by art. 17, the limitation of processing in the cases provided for in Article 18 GDPR; in addition, if the processing is based on consent or contract and is carried out by automated means, it can request to receive in a structured, commonly used and machine-readable format the data, as well as, if technically feasible, to transmit them to another owner without hindrance ("right to portability").

The data subject has the right, at any time, to opt-out the processing for direct marketing purposes (also by clicking on the "unsubscribe" linked in each message).

In any case, the data subject has the right to lodge a complaint with the competent supervisory authority in the Member State in which he/she normally reside or work or in the Member State in which the alleged infringement occurred.