PRIVACY POLICY

Information on the processing of personal data
Information document prepared pursuant to and in accordance with article 13, Reg. (UE) 2016/679.

THE DATA CONTROLLER is NOLANGROUP S.P.A., with registered office at the address of Via G. Terzi di S. Agata, 2, 24030 Brembate di Sopra (BG), in the person of the legal representative pro tempore.

The Data Protection Officer (DPO) pursuant to art. 37 – 39 of EU Reg. 2016/679 is the company LABOR PROJECT S.R.L. –DPO PROFESSIONAL SERVICE DIVISION, with registered office in Cantù (CO), at the address of Via Brianza, 65.
DPO’s contact e-mail: dpo.nolan@dpoprofessionalservice.it

<table>
<thead>
<tr>
<th>Purposes of the processing</th>
<th>Legal basis</th>
<th>Data retention period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Browsing this Internet website</td>
<td>Legitimate interest</td>
<td>rights of the data subject</td>
</tr>
<tr>
<td>Activities strictly necessary for functioning of the website and for rendering the navigation service on the platform.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>User profiling in connection with the browsing data</td>
<td>Consent</td>
<td>1 year (or until the user’s objection, if made before)</td>
</tr>
<tr>
<td>- please refer to the Cookie Policy by clicking on this link -</td>
<td></td>
<td>- please refer to the Cookie Policy by clicking on this link -</td>
</tr>
<tr>
<td>User profiling in connection with preferences, personal interests, purchasing habits, geographical position, etc. for the purpose of sending commercial offers that may be of interest to the user</td>
<td>Consent</td>
<td>1 year</td>
</tr>
<tr>
<td>Possible request for contact or request for information</td>
<td>Legitimate interest</td>
<td>Request by the data subject</td>
</tr>
<tr>
<td>Signing up for the newsletter of NOLANGROUP S.p.A. through emailing lists, by filling in the specific form</td>
<td>Consent</td>
<td>Until an objection is made (opt-out)</td>
</tr>
<tr>
<td>Activity of an organisational, administrative, financial/accounting and customer/user management nature, regardless of the type of processed data</td>
<td>Fulfilment of contractual obligations</td>
<td>fulfilment of legal obligations, if any</td>
</tr>
</tbody>
</table>
RECIPIENTS

For the purpose of complying with any existing contracts or associated purposes, your personal data shall be processed by companies contractually bound to NOLANGROUP S.P.A. and, in particular, your data may be communicated to third parties belonging to the following categories:

- subjects that provide services for the management of the IT system used by NOLANGROUP S.p.A., and of the telecommunication networks;
- free-lancers, law firms or companies within the scope of assistance and consulting relationships;
- subjects that provide services for the management of the aforementioned activities in the purposes (subjects for communication activities, printing of brochures, flyers, Internet websites, video clips);
- operators of platforms for the services listed above (website hosting, YouTube, etc);
- companies that are part of the Group.

The subjects belonging to the aforementioned categories carry out the function of Data Processors, or they work in fully autonomous way as separate Data Controllers.

TRANSFER OF DATA TO A NON-EU COUNTRY AND/OR TO AN INTERNATIONAL ORGANISATION

The data of a personal nature provided by you shall not be transferred outside the European Union.

PROVISION OF DATA

Apart from that specified for browsing data, users are free to provide their personal data. Any refusal to do so may make it impossible to obtain what the users request or to use the data Controller’s services. As regards the profiling purpose, users are free to give their consent and provide their personal data for this specific purpose, with no consequence for having done so.

RIGHTS OF THE DATA SUBJECT | COMPLAINT TO SUPERVISORY AUTHORITY

You shall be entitled to exercise your rights as expressed in article 15, 16, 17, 18, 19, 20, 21, 22 of EU Regulation 2016/679, by contacting the Data Controller through an e-mail to be sent to the address privacy@nolan.it. You shall be entitled, at any time, to ask the Data Controller for access to your personal data, to have such data corrected or deleted, and to ask that its processing be limited.

Moreover, in the cases provided for, you shall be entitled to object, at any time, to the processing of your personal data (including automated processing, such as, for example, profiling), as well as to revoke the consent granted previously without jeopardising the lawfulness for the processing based on consent prior to its revocation.

Without prejudice to any other administrative and judicial redress, should you deem that the processing of your personal data violates the provisions contained in EU Reg. 2016/679, pursuant to art. 15 letter f) of the aforementioned EU Reg. 2016/679, you shall be entitled to lodge a complaint with the European Data Protection Supervisor, in connection with art. 6 paragraph 1, letter a) (consent) as well as to revoke, at any time, the consent previously granted.

In the cases envisaged above, you shall be entitled to the portability of your data, and in that case the Data Controller will provide you, in a structure format, of common use and fully legible, with the personal data that pertains to you.

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