

## PRIVACY POLICY

This Policy is intended to provide all users with information on how MadeInAdd S.r.l. processes personal data when they browse the <https://www.madeinadd.com> platform (the "Platform") and use the services offered.

Pursuant to Article 13 of the Regulation (EU) 2016/679 (the "GDPR"), this Policy is therefore meant to provide information for data subjects accessing the Platform only, with the express exclusion of other websites that may be browsed by users through links found in it.

Such information may be modified to reflect changes in data processing or regulatory changes. Users are therefore invited to regularly check this page.

### 1. WHO IS THE DATA CONTROLLER AND HOW WILL THE PERSONAL DATA COLLECTED BE USED?

The Data Controller of the Platform is MadeInAdd S.r.l., (the "Controller"), whose contact details are given at the end of this Policy (see section 8).

The Controller collects data and information in a manner that is accurate, relevant and fit for the purpose for which such data and information are required, all unnecessary information being excluded.

### 2. WHY AND HOW IS PERSONAL DATA COLLECTED BY THE CONTROLLER?

#### 2.1 To enable users to use the Platform

Like many websites, the Platform uses log files storing the information automatically collected during users' visits. In particular, during their normal use, the IT systems and software procedures required for the operation of the Platform collect some data whose transmission is automatic when using Internet communication protocols. This information is not collected in order to be associated with specific data subjects, but by its very nature could result in the identification of users through processing and association with data held by third-parties. Some of the information collected could include, without limitation:

- internet protocol (IP) addresses,
- browser type and parameters of the device used to connect to the Platform,
- name of the internet service provider (ISP),
- date and time of visit,
- referrer webpage (i.e., page that referred a user to the Platform) and exit webpage, or
- number of clicks, if any.

The above information is processed automatically and collected – in aggregate form only – for the purpose of checking the proper operation of the Platform, and include data that will be processed as part of the legitimate interests of the Controller (GDPR Art. 6 (1) (f)).

The data collected as aforesaid shall be kept for the time necessary to carry out the activities hereof.

## **2.2 To provide users with the services offered by the Platform**

The Controller collects and uses the users' personal data to enable them to use the Platform, complete their registration, save an order and purchase a service offered.

More specifically, in order to save an order and purchase a service, the Controller collects and uses a number of data from each user, such as, without limitation, their:

- IP address,
- user registration data (email and password),
- business information (email, business name and VAT number),
- shipping address (first name, last name and business address), and
- payment information (e.g., last 4 digits of the business credit card used).

As a result, the legal basis for the collection and use of data is the performance of a contract to which the user is party, or any steps taken at the request of the user prior to entering into a contract (GDPR art. 6 (1) (b)).

Registration data shall be processed until a user account is disabled/deactivated, which can be done by a request sent to the contact details below. Any data collected during the purchase of a service shall be processed until all administrative and accounting formalities have been completed, after which it shall be stored in accordance with local tax regulations (ten years).

## **2.3 To ensure the security of the Platform and user accounts**

The Controller shall process the data for security purposes (e.g., password recovery) for the time necessary to achieve such purposes.

The legal basis for the collection and use of data can be the performance of a contract to which the user is party, or any steps taken prior to entering into a contract (GDPR art. 6(1) (b)), or the fulfilment of legitimate interests pursued by the Controller to ensure the secure operation of the Platform (GDPR art. 6 (1) (f)).

## **2.4 To carry out marketing activities**

The Controller processes the users' personal data for marketing purposes only, when they have given their consent. In these cases, the Controller may process data such as the users' postal or email addresses to send communications about news and commercial promotions, or their telephone number to send SMS messages about news and commercial promotions, or to conduct market research and opinion surveys.

The legal basis for the collection and use of such data is users' consent (GDPR Art. 6 (1) (a)).

The above data are retained until a user withdraws the consent given (opt-out right), unless there is no other legal basis for the processing.

## 2.5 For legal purposes

The Controller processes users' personal data in order to comply with legal obligations (e.g., tax formalities), handle their requests regarding their personal data or protect the Controller's rights.

The legal basis for the collection and use of such data is compliance with legal obligations (GDPR art. 6 (1) (c)).

The above personal data are kept for the time strictly necessary for the fulfilment of the above purposes.

## 3. PERSONAL DATA PROCESSORS AND OTHER POSSIBLE RECIPIENTS OF THOSE DATA

Users' data are processed by personnel duly instructed by the Controller. For organisational and functional requirements relating to the provision of the service offered, users' data may be processed by service providers of the Controller (e.g., providers of payment services, logistics). Some of these providers may also be based in non-EU countries and, in these cases, the transfer of personal data to these countries is carried out in compliance with the safeguards provided for by law.

All these parties act as autonomous data controllers or have been authorised by the Controller to act on its behalf as data processors. A list of these parties can be requested using the contact details specified in section 8 below.

## 4. TRANSFER OF DATA TO COUNTRIES OUTSIDE THE EU

Personal data may be transferred to entities located in EU or non-EU countries, where such transfer is instrumental in the achievement of the above purposes. Some of these jurisdictions may not provide the same level of data protection as the country where a data subject resides. In this case, the Controller shall ensure that the relevant data are processed with utmost confidentiality by taking appropriate steps for their protection, including, in the absence of "adequacy" decisions – i.e., decisions certifying adequate data protection standards in third countries – the conclusion of agreements guaranteeing an adequate level of protection and/or containing standard contractual clauses provided for by the European Commission.

## 5. COOKIES

The Controller uses cookies to make the users' browsing experience easier and more intuitive. To find out more, check our Cookie Policy on <https://www.madeinadd.com/it-it/cookie-policy/>.

## 6. USER RIGHTS

As a data subject (the "Data Subject") each user may exercise the rights listed in Articles 15 to 22 of the GDPR by contacting the Controller via the contact details specified in section 8 below.

In particular, all data subjects have the right to:

- obtain confirmation as to whether or not personal data concerning them are being processed, even if not yet recorded, and communication of such data in intelligible form;
- obtain, *inter alia*, information on (i) the origin of the personal data; (ii) the purposes and methods of the processing; (iii) the identification details of the Controller; (iv) the recipients or categories of recipients to whom or which the personal data may be communicated or who or which may become aware of them,

including in their capacity as data processors; (v) the categories of personal data concerned; (vi) where possible, the planned storage period or the criteria used to determine it; (vii) the existence of the right to request rectification, erasure or restriction of processing of personal data; (viii) the existence of the right to object to processing; (ix) the right to lodge a complaint with the competent supervisory authority; (x) the existence of an automated decision-making process, including profiling;

- obtain (i) rectification or integration of personal data; (ii) restriction of processing, where possible; (iii) portability of personal data, where applicable; (iv) certification to the effect that the operations as per (i) and (ii) above, and the object of such operations, as well as the related deletion as per the following point, have been notified to the recipients of any personal data communication or transmission, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
- obtain the deletion of personal data in the cases provided for by law;
- withdraw consent to the processing of personal data (opt-out right), without in any case affecting the lawfulness of the processing carried out before the withdrawal;
- to object, in whole or in part (i) on legitimate grounds, to the processing of personal data, even if relevant to the purpose of collection; and (ii) to the processing of personal data for the purpose of sending communications;
- lodge a complaint with the Italian Data Protection Authority (*Garante per la protezione dei dati personali*).

## 7. STORAGE PERIOD

Data shall be processed and stored for the time required for the purposes for which they were collected (see section 2).

At the end of the storage period, the personal data will be deleted and – consequently – the possibility of exercising the rights connected to the processing will also cease.

## 8. CONTACT DETAILS

For any questions regarding the collection and use of your data when using the Platform, or for information on your rights, please contact our data protection team at: [dataprotectionteam@madeinadd.com](mailto:dataprotectionteam@madeinadd.com) or at the Controller's offices in Turin, Via Pier Carlo Boggio 59.