Information –

Customers, Tenants, extraordinary operations, M&A and other similar cases

Who are we and what do we do with your personal data?

IGD Service S.r.l., hereinafter the Data Controller, protects the confidentiality of your personal data and provides it with the necessary protection from any event that may put it at risk of violation.

For this purpose, the Data Controller implements policies and practices regarding the collection and use of personal data and the exercise of your rights under applicable law. The Data Controller is responsible for updating the policies and practices adopted for the protection of personal data whenever necessary and in any case in the event of regulatory and organisational changes that may affect the processing of your personal data.

The Data Controller appointed a Data Protection Officer (DPO) who you can contact if you have questions about adopted policies and practices. The contact details of the Data Protection Officer are as follows: dpo@gruppoigd.it

How does the Data Controller collect and process your data?

The Data Controller collects and/or receives information about you, such as:

- name, surname,
- images,
- telephone number,
- physical and electronic address,
- ID code,
- current account number,
- VAT number and tax code,
- data relating to criminal convictions and crimes or related security measures (processed exclusively for the management of disputes and for specific regulatory obligations of the Data Controller).

Your personal information will be processed for:

1) **the management of the contractual relationship and the consequent obligations, regulatory or otherwise**

Your personal data is processed in order to carry out the preliminary activities and the activities resulting from the management of the contract with the Data Controller, such as, for example: invoicing and payment management, handling of complaints and/or reports to the technical support service, management and settlement of contractual and conventional guarantees, as well as for the fulfilment of any other obligation arising from the contract, such as the recording and storage of your personal data.

The obligations to be fulfilled by the Data Controller under the contract and under specific regulations governing it are, among other things:

- the keeping of the accounts;

Your personal data is also processed to prevent fraud, including contractual fraud. Finally, your data (such as your land line and/or mobile phone number and your electronic address) will be processed to provide you with support on the services covered by the contract.

Your personal data is also collected from third parties such as, for example:

- other data controllers, e.g. the companies of the group to which the Data Controller belongs
- lists and records kept by or under the authority of public authorities or similar bodies in accordance with specific national and/or international regulations;
- private and public bodies operating in the sector within the national and international territory with which the data controller established information relations;

2) **communication to third parties and recipients**

Your personal data is processed under the contract and the legal and regulatory obligations resulting from it.

Your data will not be disclosed to third parties/recipients for their own purposes unless:

1. you authorise to do so.

Your data will not be disclosed to third parties/recipients if

1. it is necessary for the fulfilment of obligations under the contract and law regulations governing it (e.g. for the defence of your rights, for reporting to the supervisory authorities, etc.);
2. the communication is made to the companies of the Group to which the Data Controller belongs in order to fulfil the obligations arising from the contract; auditing companies of the financial statements; quality assurance companies; banks for managing collections and payments; companies and law firms for the protection of contractual rights and/or dealing with debt collection; data processing and IT service companies (e.g. web hosting, data entry, management and maintenance of IT infrastructures and services, etc.);
3. the communication is made to the tax authorities and to public supervisory and control bodies towards which the Data Controller must fulfil specific obligations deriving from the specific nature of the activity carried on.

What happens if you do not provide your data?

If you do not provide your personal data, the Data Controller will not be able to carry out the processing operations related to the management of the contract and its services or the obligations that depend on it.

The intention of the Data Controller was to carry out certain processing operations in accordance with certain legitimate interests that do not affect your right to confidentiality, such as those that:

- prevent IT accidents and allow notification to the supervisory authority or communication to users, if necessary, of the personal data breach;
- allow the communication of your personal data to the companies of the group to which the Data Controller belongs for administrative purposes;
- allow communication to third parties/recipients for activities related to those of contract management.

How and for how long is your data retained?

How

Data processing is carried out on paper or through IT procedures by internal subjects authorised and trained for this purpose. They are granted access to your personal data to the extent and within the limits required for carrying out the processing activities that concern you.

The Data Controller periodically checks the tools by means of which your data is processed and its security measures, which it constantly updates; it makes sure, also through the subjects authorised to process the data, that personal data for which processing is not necessary is not collected, processed, stored or retained; it makes sure that the data is retained with the guarantee of integrity and authenticity of its use for the purposes of the processing actually carried out.

Where

The data is retained on paper, computer and electronic files located within the European Economic Area, and appropriate security measures are ensured.

How long

The personal data processed by the Data Controller is retained for the time necessary for the carrying-out of activities related to the management of the contract with the Data Controller and until ten years after its conclusion (art. 2946 of the Italian Civil Code) or from when the rights that depend on it can be enforced (pursuant to art. 2935 of the Italian Civil Code); as well as for the fulfilment of the obligations (e.g. tax and accounting obligations) that remain even after the conclusion of the contract (art. 2220 of the Italian Civil Code), for the purposes of which the Data Controller must retain only the data necessary for their furtherance. This is without prejudice to the cases in which the rights deriving from the contract should be asserted in court, in which case your data, only that necessary for these purposes, will be processed for the time necessary to pursue them.

This is without prejudice to your right to oppose at any time the processing based on legitimate interest for reasons related to your particular situation.

What are your rights?

The rights granted to you allow you to always have control on your data. Your rights are those of:

- Access;

- Rectification;
- Withdrawal of consent;
- Erasure;
- Restriction of processing;
- Opposition to the processing;
- Portability.

In substance, at any time and free of charge and without any special charges or formalities for your request, you can:

- obtain confirmation of the processing carried out by the Data Controller;
- access your personal data and know its origin (when the data is not obtained directly from you), the purposes of the processing, the data of the subjects to whom it is communicated, the period of retention of your data or the criteria used to determine it;
- withdraw your consent at any time if this is the basis for the processing. In any case, the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal;
- update or rectify your personal data so that it is always accurate and correct;
- erase your personal data from the databases and/or files, including backup files, of the Data Controller, if, among other things, it is no longer necessary for the purposes of the processing or if this is deemed unlawful, and provided that the conditions laid down by law are met; and in any event if the processing is not justified by another equally legitimate reason;
- restrict the processing of your personal data in some circumstances, for example if you have contested its accuracy, for the period required for the Data Controller to check its accuracy. You must also be informed, in reasonable time, of when the period of suspension has ended or the cause of the restriction of processing has ceased to exist, and therefore the restriction itself withdrawn;
- obtain your personal data, if received and/or in any case processed by the Data Controller with your consent and/or if its processing is carried out on the basis of a contract and with automated tools, in electronic format also in order to transmit it to another data controller.

The Data Controller must do so without delay and, in any case, at the latest within one month of receipt of your request. The time limit can be extended by two months, if necessary, taking into account the

complexity and the number of requests received by the Data Controller. In such cases, the Data Controller will inform you of the reasons for the extension within one month of receipt of your request.

For any further information and to send your request, please contact the Data Controller at privacy@gruppoigd.it

How and when can you oppose the processing of your personal data?

For reasons relating to your specific situation, you may oppose at any time the processing of your personal data if this is based on legitimate interest, by sending your request to the Data Controller at the email address privacy@gruppoigd.it

You have the right to have your personal data erased if there is no legitimate reason overriding the one that gave rise to your request.

Who can you complain to?

Without prejudice to any other administrative or judicial action, you may submit a complaint to the competent supervisory authority or to the authority that carries out its tasks and exercises its powers where you have your habitual residence or work or, if different, in the Member State where the violation of Regulation (EU) 2016/679 occurred.

Any update of this information will be communicated to you in a timely manner and by appropriate means and you will also be informed if the Data Controller will process your data for purposes other than those referred to in this information before carrying it out and in time to give your consent if necessary.