

PRIVACY POLICY

Last updated: May 29, 2023

Pursuant to Art. 13 of the General Data Protection Regulation no. 2016/679 (hereinafter referred to as "**GDPR**"), Traent S.r.l. informs the user of the following.

The purpose of this Privacy Policy is to describe the procedures that Traent S.r.l. adopts in relation to the collection, use, and disclosure of your Personal Data, when you use the Traent website, <http://www.traent.com> (hereinafter referred to as "**Website**").

This Privacy Policy also informs the user about the user's rights and how the law protects the user.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions and shall have the same meaning regardless of whether they appear singular or plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for the user to access Traent Service or parts of Traent Service.

Company/Traent S.r.l. (referred to as either the "**Company**" or "**Traent**") refers to Traent S.r.l., with its registered offices at Viale Coni Zugna, n. 71, (20144) Milan, VAT number 11036710967.

Consent of the data subject (referred to as "**Consent**") means any freely given, specific, informed, clear and explicit indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

Data Controller means the natural or legal person, public authority, service, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

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Data Processor means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller.

Device means any device that can access the Service such as a computer, a cellphone, or a digital tablet.

Personal Data is any information relating to an identified or identifiable natural person (referred to it as “**Data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular 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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means 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.

Services refer to the Website, the Platform, and its Tools.

Third-party Social Media Service refers to any website or any social network website through which a user can log in or create an account to use the Service.

Usage Data refers to Data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Data Controller

The Data Controller is Traent S.r.l., hereby represented by its legal representative, with registered offices at Viale Coni Zugna n. 71, Milan (20144).

The updated list of Data Processors, where designated, can be provided at the request of the Data subject.

Purpose and Legal Basis for Processing

Traent processes the User's Personal Data for purposes strictly related and necessary to the use of the Site and Services, as well as to ensure the network and data security of the Company's information systems.

In particular, Traent processes the User's Personal Data for the following purposes: (I) registration on the Site and management of the Account; (II) management of

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the purchase of products, related payments and services related to the use of the Site; (III) assistance service in case of requests of a technical-commercial nature; (IV) sending of promotional and commercial communications related to products and services similar to those purchased by the user; (V) sending of the Traent Newsletter containing promotional and commercial communications.

The legal basis of the Processing is identified in the following cases, depending on the various purposes set out above, where the Processing:

1. Is necessary for the performance of a contract to which the user is a party or the performance of pre-contractual measures taken upon the user's request – art. 6, par. 1, lett. b) GDPR;
2. Is necessary to comply with a legal obligation incumbent on the Data Controller – art. 6, par. 1, lett. c) GDPR;
3. Is necessary for the purposes of the legitimate interests pursued by the Data Controller – art. 6, par. 1, lett. f) GDPR;
4. Is based on clear and explicit consent (for example to contact the user by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation) – art. 6, par. 1, lett. a) GDPR.

Types of Data Collected

1. Personal Data

While using our Service, the Company may ask the user to provide the Company with certain personally identifiable information that can be used to contact or identify the user. Personally identifiable information may include, but is not limited to:

- A. Name, surname and place of birth
- B. Email address
- C. Phone number
- D. Address

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2. Browsing Data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, certain data whose transmission is implicit in the use of Internet communication protocols.

These data, necessary for the use of web services, are also processed for the purpose of: (I) obtain statistical information on the use of the services (most visited pages, number of visitors per hour or per day, geographical areas of origin); (II) check the correct functioning of the services offered.

Processing Methods

The Processing of Personal Data is carried out through the use of electronic or automated tools, in compliance with the rules of confidentiality and security provided for by the regulations in force.

Consequences of non-disclosure of Personal Data

With regard to Personal Data relating to the performance of the contract to which the user is a party or relating to the fulfilment of a legal obligation, failure to provide Personal Data prevents the completion of the contractual relationship itself.

On the other hand, the provision of data subject to the user's specific consent is optional for the purpose of receiving promotional and commercial information, without this preventing the contractual relationship from being carried out.

Recipients of Personal Data

User's Personal Data may be communicated to the following categories of subjects:

1. companies acquired and/or controlled by Traent, for contract execution and related administrative purposes;
2. employees and collaborators designated by the Data Controller as subjects authorized to process Personal Data;
3. entities and/or subjects designated as Data Processors;
4. employees and collaborators who provide their services for the Data Processor;
5. agents, sub-suppliers, sub-contractors and those involved in and/or forming part of Traent's sales channel;

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6. business partners, operating in the electronics sector, with whom the Data Controller collaborates for the development of projects of various kinds;
7. suppliers of customer care services in relation to user requests;
8. external IT service providers that provide IT maintenance and assistance, IT solutions (e.g. cloud services) and software solutions on behalf of Traent;
9. freelancers or professional firms appointed to take on the defense of Traent in litigation and/or administrative proceedings by reason of the aforementioned relationships;
10. natural or legal persons appointed by Traent to perform services related to the management of payment systems in use at the Site, as well as debt collection companies;
11. public security authorities, judicial authorities, individuals, entities or authorities to whom the User's Personal Data must be disclosed under provisions of the law or orders of the authorities.

Profiling

For the pursuit of the purposes of the Processing described above, no decision is made based solely on automated Processing that produces legal effects concerning the user or that significantly affects the user.

Transfer of Personal Data

User's Personal Data are processed at the Company's operating offices and in any other places where the parties involved in the Processing are located.

The Data Controller does not transfer Personal Data to third countries or to international organizations. However, it reserves the right to use cloud services, in which case, the service providers will be selected from among those who provide adequate guarantees, as governed by Article 46 GDPR.

In any case, Traent will take all steps reasonably necessary to ensure that user's Data is treated securely and in accordance with this Privacy Policy and no transfer of user's Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of user's Data and other personal information.

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Retention of user's Personal Data

In order to ensure fair and transparent processing, Personal Data are retained for a period of time not longer than necessary for the purposes for which they were collected or subsequently processed, in accordance with Article 5(1)(e) GDPR.

Personal Data may be retained for longer periods of time where necessary to comply with statutory and/or legal obligations, as well as to ensure the judicial protection of the Data Controller's rights in compliance with ordinary prescription periods.

Security of user's Personal Data

The Company agrees to utilize physical, and technical safeguards designed to protect user's Data from unauthorized access, disclosure, acquisition, destruction, use, or modification. The Company shall adhere to any applicable law relating to Data security. The Company shall implement an adequate cybersecurity framework based on one of the nationally recognized standards. Additionally, the Company may choose to further detail its security programs and measures in addition to the adopted standards.

Cookies

Cookies are small text files that the Site sends to the user's terminal, where they are stored and then transmitted back to the site on the next visit. This Site uses various types of cookies, some of which are third-party cookies.

Third-party cookies are set by a website other than the one the user is visiting.

This Site uses the following cookies:

1. necessary cookies that contribute to the usability of the Site by enabling its basic functionality such as page navigation and access to protected areas of the Site. The Site cannot function properly without these cookies;
2. analytical cookies that allow us to understand how users interact with the Site by collecting and reporting anonymous information for statistical purposes;
3. preference cookies which allow the Site to store information that influences its behavior or appearance, such as your preferred language or location;
4. marketing cookies which are used, with your consent, to track your visits to the Site. The purpose is to present advertisements that are relevant and

engaging to the individual user and therefore of greater value to third party publishers and advertisers.

Users' Rights

The user may exercise the following rights:

1. Right of access by the data subject (art. 15 GDPR);
2. Right to rectification (art. 16 GDPR);
3. Right to erasure (art. 17 GDPR);
4. Right to restriction of processing (art. 18 GDPR);
5. Right to data portability (art. 20 GDPR);
6. Right to object (art. 21 GDPR);
7. Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or significantly affects them in a similar way (art. 22 GDPR).
8. Right to complain to the Italian Data Protection Authority, if the user believes that the processing of Personal Data is carried out in violation of the provisions of the legislation in force, (art. 77 GDPR), or to take appropriate legal action, pursuant to art. 79 GDPR.

The user may exercise the rights listed above by writing to traent@pec.it.

Links to Other Websites

Our Service may contain links to other websites that are not operated by the Company. If user clicks on a third party link, user will be directed to that third party's site.

The Company has no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Changes to this Privacy Policy

The Company may update Privacy Policy from time to time. We will notify user of any changes by posting the new Privacy Policy on this page.

The Company will let user know via email and/or a prominent notice on Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

User is advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

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Contact Us

If user has any questions about this Privacy Policy, you can contact the Company:

- By visiting this page on our website: <http://www.traent.com>.

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