

A. Who are we and why are we providing you with this document?

The Mondadori Group, a corporate group composed of the parent company Arnoldo Mondadori Editore S.p.A. and the companies controlled by the latter in accordance with article 2359 of the Italian Civil Code (hereinafter referred to as the “**Mondadori Group**”), has always considered the protection of the personal data of its customers and/or potential customers and users to be of primary importance, ensuring that the processing of personal data, carried out by any means, whether automated or manual, is carried out in full compliance with the protections and rights set forth by Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “**Regulation**”) and other applicable legislation on personal data protection.

The term “personal data” refers to the definition provided in Article 4(1) of the Regulation, meaning *‘any information relating to an identified or identifiable natural person; 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* (hereinafter “**Personal Data**”).

The Regulation provides that, before any processing of Personal Data – meaning, according to the relevant definition set out in Article 4(2) of the Regulation, *‘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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction’* (hereinafter referred to as the “**Processing**”) – it is necessary that the person to whom such Personal Data refer is informed about the reasons why such data are required and how they will be processed. In this regard, the purpose of this document is to give you, in a simple and clear manner, all the useful and necessary information so that you can provide your Personal Data in a conscious and informed manner and, at any time, request and obtain clarifications and/or corrections.

This privacy policy, therefore, has been written on the basis of the principle of transparency and all the elements required by Article 13 of the Regulation and is divided into individual sections (hereinafter referred to as “**Sections**”) and individually as “**Section**”) each of which deals with a specific topic in order to make your reading quicker, smoother and easier to understand (hereinafter referred to as the “**Privacy Policy**”).

After having read this Privacy Policy, during the registration and activation of the hosting service you required, you will also receive a specific consent form as provided for in Article 7 of the Regulation.

B. Who will process your Personal Data?

The company that will process your Personal Data for the purposes referred to in Section D of this Privacy Policy and that, therefore, will act as data controller according to the relevant definition provided in Article 4 point 7) of the Regulation, *‘the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data’* is **Arnoldo Mondadori Editore S.p.A.**, with registered office in Via Gian Battista Vico 42, 20123 - Milan and administrative office in Via Mondadori 1, 20054 - Segrate (MI), enrolled in the Register of Companies of Milan, Tax code no. 07012130584 and VAT no. 08386600152 (hereinafter the “**Controller**”).

C. Who can you contact for any information or request?

The Controller may be contacted via the following channels:

- in writing to the Mondadori Group Privacy Office at the parent company Arnoldo Mondadori Editore S.p.A., Via Mondadori 1, 20054 - Segrate (Milan);
- by sending an e-mail to the e-mail address privacy@mondadori.it to the kind attention of the Mondadori Group Privacy Office;
- by calling +39 02 75421 and asking for the Mondadori Group Privacy Office.

Moreover, in order to facilitate the relationship between you, as data subject, meaning the *‘identified or identifiable natural person’* to whom the Personal Data refer pursuant to article 4, point 1) of the Regulation (hereinafter the “**Data Subject**”) and the Controller, the Regulation has provided, in certain specific cases, for the appointment of a control and support figure who, among other tasks, also acts as a point of contact with the Data Subject.

The Mondadori Group has implemented this function of “**Data Protection Officer**” (hereinafter referred to as the “**DPO**”).

The DPO, pursuant to and for the purposes of Article 39 of the Regulation, is called upon to perform, *inter alia*, the following activities:

- informing and advising the Controller, the data processor as well as the employees carrying out the Processing with regard to the obligations arising from the Regulation as well as from other provisions of the European Union or of the Member States relating to the protection of Personal Data;
- monitor and supervise compliance with the Regulation, the applicable regulations on the protection of Personal Data, and the policies and procedures adopted by the Controller;
- provide feedback support to the Data Subject;

- cooperate with the Garante per la Protezione dei Dati Personali or other competent supervisory authority.

As provided for in article 38 of the Regulation, you may feel free to contact the DPO for all matters relating to the Processing of your Personal Data and/or should you wish to exercise your rights as provided for in Section H of this Privacy Policy, by sending a written communication to the e-mail address dpo@mondadori.it and/or by writing to the Data Protection Officer of the Mondadori Group at Arnoldo Mondadori Editore S.p.A., via Mondadori 1, 20054 - Segrate (MI).

You may consult the “Privacy” section of the Mondadori Group’s web sites at any time, where you will find all the information regarding the use and processing of your Personal Data, the detailed references of each company of the Mondadori Group, and updated information on the contacts and communication channels made available by the Controller.

D. For what main purpose will your Personal Data be processed?

Without prejudice to any other information notice that the Controller and/or other company of the Mondadori Group may have delivered to you, this Privacy Policy refers to the Processing of Personal Data carried out by the Controller in order to follow-up to your request to receive the newsletter of the Controller.

In particular, the Controller will process your Personal Data for the following purposes:

- 1. Sending you our newsletter as per your request.** Upon your request, the Controller will collect and process your Personal Data for the purpose of sending our periodic newsletter regarding AI, new technologies, startup ecosystem, and similar topics pursuant to Article 6(1)(b) of the Regulation. The Processing will be carried out through the collection and processing of the Personal Data submitted by you when subscribing on the Controller’s website. Such Personal Data and information will include your email address (including possibly your name/surname if contained in your email address) and other technical information needed for sending the email through the Internet.
- 2. Compliance with legal or regulatory obligations.** As the case may be, the Controller may process your Personal Data in order to comply with legal and/or regulatory obligations applicable to it, as well as to respond to requests from competent authorities. In this case, the Processing of your Personal Data will be based on the fulfilment of legal obligations to which the Controller is subject pursuant to Article 6(1)(c) of the Regulation.
- 3. Merger and acquisition operations and/or corporate reorganization.** To the extent applicable, the Controller may also disclose or process your Personal Data in the context of M&A operations, transfer of contract, business or business unit, corporate reorganization and restructuring in order to conclude and manage

such operations or to fulfil contractual obligations arising therefrom. In this case, the Processing of your Personal Data will be legally based on the legitimate interest of the Controller to perform such operations pursuant to Article 6(1)(f) of the Regulation. You will always have the right to object for reasons based on your particular situation and, as the case may be, you will be provided with further information with more details about the specific processing carried out in the context of the corporate transaction.

- 4. Defense in court and protection of own interests.** The Controller may process your Personal Data to assess, exercise and/or defend its rights in judicial and/or litigation proceedings. Such Processing will be legally based on the legitimate interest of the Controller to protect its rights within the meaning of Article 6(1)(f) of the Regulation. You will always be granted the right to object for reasons based on your particular situation and, as the case may be, you will be provided with further information with more details about the specific processing carried out.

In order to allow the Controller to carry out the Processing activities for the purposes set out in points 1) and 2) above, it will be necessary for you to provide the Personal Data included in the subscription form. In the absence of such information, it will not be possible to proceed with the Processing of your Personal Data and, consequently, it will not be possible to follow up to your request of receiving the newsletter and, as the case may be, to fulfil the legal obligations applicable to the Controller. For the remaining purposes referred to in numbers 3), and 4), the provision of data is optional, but in any case, necessary for the performance of each Processing; depending on the case, therefore, it may not be possible to perform the Processing and/or continue with the performance of the contract entered into by you.

E. To which entities may your Personal Data be disclosed?

Your Personal Data may be disclosed to specific entities that are considered recipients of such Personal Data. In fact, Article 4(9) of the Regulation defines a recipient of Personal Data as “a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not” (hereinafter referred to as the “Recipients”).

In this perspective, in order to properly carry out all the Processing activities necessary to pursue the purposes set out in this Privacy Policy, the following Recipients may be in a position to process your Personal Data:

- third parties who carry out part of the Processing activities and/or activities connected and instrumental thereto on behalf of the Controller. Such entities have been appointed as Controllers, whereby this expression is to be understood, pursuant to Article 4(8) of the Regulation, as “a natural or legal person, public authority, agency or other body which processes personal data on behalf of

the controller" (hereinafter the "Processor");

- individuals, employees and/or contractors of the Controller, who have been entrusted with specific and/or multiple Processing Activities of your Personal Data. Such individuals have been given specific instructions on the security and proper use of Personal Data and are defined, pursuant to Article 4(10) of the Regulation, as "*persons who, under the direct authority of the controller or processor, are authorised to process personal data*" (hereinafter the "Authorised Persons");
- third parties who carry out processing activities and/or activities connected and instrumental to the same as autonomous Controllers, including but not limited to consulting companies, freelance professionals, credit institutions, insurance companies, third-party companies and/or companies that are part of the Mondadori Group;
- where required by law or to prevent or suppress the commission of a criminal offence your Personal Data may be disclosed to public bodies or judicial authorities without them being defined as Data Subjects. Indeed, according to Article 4(9) of the Regulation, "*public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients*".

F. How long will your Personal Data be processed?

One of the principles applicable to the Processing of your Personal Data relates to the limitation of the retention period, which is governed by Article 5(1)(e) of the Regulation, which provides that "*personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject*".

In light of this principle, your Personal Data will be processed by the Controller only to the extent necessary for the fulfilment of the purpose set out in Section D of this Privacy Policy. In particular, your Personal Data will be kept for a period of time equal to the minimum necessary, as indicated by Recital 39 of the Regulation, that is, up to ten years from the termination of the existing contractual relationship between you and the Controller, without prejudice to an additional retention period that may be imposed or permitted by law as also provided for by Recital 65 of the Regulation.

G. Is it possible to withdraw the consent given and how?

For the sake of completeness, please be informed that, where you have given your consent to the processing of your personal data, you may, at any time, withdraw your consent in whole and/or in part without prejudice to the lawfulness of the processing based on the consent given before the withdrawal. Your Personal Data will not be processed on the basis of your consent for the purposes set out in Section E of this Privacy Policy, please feel free to contact the Controller and/or the DPO using the contact channels provided in section C of this Privacy Policy.

H. What are your rights?

As provided for in the Regulation, you may at any time exercise the following rights vis-à-vis the Controller:

- Right of access: you have the right, pursuant to Article 15(1) of the Regulation, to obtain from the Controller confirmation as to whether or not your Personal Data is being processed and, if so, to obtain access to such Personal Data and to the following information (a) the purposes of the Processing; (b) the categories of Personal Data concerned; (c) the Recipients or categories of Recipients to whom your Personal Data has been or will be disclosed, in particular if Recipients from third countries or international organisations; d) where possible, the expected period of retention of Personal Data or, if this is not possible, the criteria used to determine this period; e) the existence of the Data Subject's right to request from the Controller the rectification or erasure of Personal Data or the restriction of the Processing of Personal Data concerning him/her or to object to the Processing of Personal Data f) the right to lodge a complaint with a supervisory authority; g) if the Personal Data are not collected from the Data Subject, all available information on their origin; h) the existence of an automated decision-making process, including profiling as referred to in Article 22(1) and (4) of the Regulation and, at least in such cases, meaningful information on the logic used, as well as the importance and the foreseen consequences of such Processing for the Data Subject. All this information can be found in this Privacy Policy which will always be available to you in the Privacy section of each of the Websites.
- Right of rectification: you may obtain, pursuant to Article 16 of the Regulation, the rectification of your Personal Data that is inaccurate. Considering the purposes of the Processing, you may also obtain the integration of your Personal Data that are incomplete, including by providing a supplementary declaration.

- Right to erasure: you may obtain, pursuant to Article 17(1) of the Regulation, the erasure of your Personal Data without undue delay and the Controller shall be obliged to erase your Personal Data if any of the following reasons apply (a) your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) you have withdrawn the consent on which the Processing of your Personal Data is based and there is no other legal basis for its Processing; (c) you have objected to the Processing in accordance with Article 21(1) or (2) of the Regulation and there is no longer any overriding legitimate ground for the Processing of your Personal Data; (d) your Personal Data has been processed unlawfully; (e) it is necessary to delete your Personal Data in order to comply with a legal obligation under EU or national law. In some cases, as provided for in Article 17(3) of the Regulation, the Controller is entitled not to erase your Personal Data if the Processing of your Personal Data is necessary, for example, for the exercise of the right to freedom of expression and information, to comply with a legal obligation, for reasons of public interest, for archiving in the public interest, for scientific or historical research or statistical purposes, for the establishment, exercise or defence of legal claims.
- Right to restriction of processing: you may obtain the restriction of the Processing, pursuant to Article 18 of the Regulation, in the event that one of the following cases occurs (a) you have objected to the accuracy of your Personal Data (the restriction will last for the period necessary for the Controller to verify the accuracy of such Personal Data); (b) the Processing is unlawful but you have objected to the deletion of your Personal Data, requesting instead that its use be restricted (c) although the Controller no longer needs your Personal Data for the purposes of the Processing, your Personal Data is needed for the establishment, exercise or defence of legal claims; (d) you have objected to the Processing pursuant to Article 21(1) of the Regulation and are awaiting verification as to whether the Controller's legitimate reasons prevail over yours. If the Processing is restricted, your Personal Data will be processed, except for storage, only with your consent or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest. We will, in any event, inform you before such restriction is lifted.
- Right to data portability: you may, at any time, request and receive, pursuant to

Article 20(1) of the Regulation, all of your Personal Data processed by the Controller in a structured, commonly used and readable format or request its transmission to another Controller without hindrance. In this case, it will be your responsibility to provide us with the exact details of the new controller to which you intend to transfer your Personal Data by providing us with written authorisation.

- Right to object: pursuant to Article 21 of the Regulation you may object, at any time, to the Processing of your Personal Data a) if it is processed for direct marketing purposes, including profiling insofar as it is related to such direct marketing, or b) for reasons related to your particular situation, if your Personal Data is processed on the basis of the legitimate interest of the Controller or a third party, unless there are compelling legitimate grounds for the Processing which override your interests, rights and freedoms or the Processing is necessary for the establishment, exercise or defence of legal claims.
- Right not to be subject to automated decision-making relating to natural persons: in accordance with Article 22 of the Regulation and given the need to use the Algorithm for activities preparatory to the conclusion of the contract with the Controller in relation to the hosting service, you have the right to (i) obtain human intervention by the Controller in order to obtain a review of the results of the decision-making process, (ii) express your opinion, and/or (iii) contest the decision made.

To exercise all your rights as identified above, simply contact the Controller in the manner set out in Section C of this Privacy Policy.

Please note that you may also contact the DPO of the Mondadori Group at any time in the manner set out in Section C of this Privacy Policy.

In addition, you have the right to lodge a complaint with the supervisory authority: without prejudice to your right to appeal to any other administrative or judicial body, if you consider that the Processing of your Personal Data carried out by the Controller is in breach of the Regulation and/or the applicable legislation, you may lodge a complaint with the Italian Data Protection Authority or any other competent supervisory authority.

Please note that you may also contact the DPO of the Mondadori Group at any time in the manner set out in Section C of this Privacy Policy.

I. Where will your Personal Data be processed?

Your Personal Data will be processed by the Controller within the territory of the European Union.

If for technical and/or operational reasons it is necessary to use entities located outside the European Union, we hereby inform you that, where such entities process Personal Data on behalf of the Controller, they will be appointed as Processors pursuant to article 28 of the Regulation and the transfer of your Personal Data to such entities, limited to the performance of specific Processing activities, will be governed by the provisions of chapter V of the Regulation. Therefore, all necessary precautions will be taken in order to ensure the most complete protection of your Personal Data by basing such transfer: (a) on adequacy decisions of the receiving third countries issued by the European Commission; (b) on standard contractual clauses drafted by the European Commission; (c) on the adoption of *corporate binding rules*.

In any event, you may request further details from the Controller if your Personal Data has been processed outside the European Union and ask for evidence of the specific safeguards adopted.