

# PRIVACY POLICY REGARDING THE PROCESSING OF PERSONAL DATA

Antonio Zamperla S.p.A. (tax code and VAT no. IT 00655110245), as the Data Controller (hereafter also referred to as the "Controller"), with registered office at Via Monte Grappa 15/17, 36077 Altavilla Vicentina (VI), Italy, represented by its legal representative, in compliance and fulfillment of the provisions set forth by EU Regulation 2016/679, concerning the protection of natural persons with regard to the processing of Personal Data, as well as the free movement of such data (hereinafter referred to as "GDPR"), with this document intends to inform the Users (also referred to as "data subjects"), who may consult the site and utilize the functionalities and services contained therein, about the methods of collection and processing of personal data.

The information contained in this document exclusively refers to the website www.zamperla.com owned by the Data Controller.

Users are also encouraged to review the privacy policies on the processing of personal data provided by any third parties, which they may come into contact with during navigation.

1. Regulatory References

This information is prepared in fulfillment of the obligations set out in Articles 13 and subsequent of the mentioned Regulation and as provided by the Directive 2002/58/EC as updated by Directive 2009/136/EC, concerning Cookies, to which this information refers.

## 2. Website Functionality

The site allows the performance of various activities, interactive or not. It is possible to navigate through the different sessions without the request or collection of the User's personal data (see Cookie Policy).

It is also possible to carry out interactive activities in the sections:

- Newsletter •
- Contacts •
- Customer care (after sale, spare parts)
- Work with us (careers)
- Private area •
- Page footer

## 3. Types of Data Collected

Through the Site, it is possible to provide the Controller with personal data as requested in the forms (first and last name, email, country, reason for interest). No special categories of personal data are collected.

Users are asked not to enter personal data related to other people or special categories of data; in the case where the Personal Data communicated through the site belong to other subjects and not to the User browsing the Site, these will be



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processed only if the User can prove to be authorized to communicate them; otherwise, these data—including special categories—will be deleted. During navigation, data for statistical and analysis purposes may be collected and aggregated, stored in the server's (hosting) log files of the site, such as IP address, browser type; ISP; date and time of visit.

#### 4. Cookies

The site uses cookies, text files that allow verifying its correct functioning, to store information on user preferences, to enhance its functionality, to simplify navigation, and/or to perform an analysis on the use of the site.

The cookies that may be used are:

- Technical cookies, used solely for the purpose of carrying out the transmission of an electronic communication, to ensure the correct display of the site and navigation within it. Consent is not required for these cookies.
- Analytical cookies, used directly by the provider to collect information, in aggregated form, on the number of users and how they visit the site. They are assimilated to technical cookies since the service is based on aggregated data.
- Profiling and marketing cookies, used exclusively to collect information on the behavior of users during navigation, on their interests and consumption habits, also to provide advertising and personalized communications. Consent from the User is required for these types of cookies. At any time, the User has the ability to disable cookies and/or revoke the consent given.

Instructions for disabling them are on the provider's websites, such as <u>Google</u>, <u>Youtube</u>. Third-party cookies (<u>Facebook</u>, <u>Instagram</u>, X,...) may be used on the site to provide additional services to users, to collect data on their interests to provide advertising and personalized communications. The Controller informs that it has no control over cookies entirely managed by third parties and has no access to the information thus collected. Information on the use of said cookies and their purposes, as well as on the procedures for possible disabling, are provided directly by the third parties.

5. Social Network Plugins

To allow easy content sharing on social networks, the Site uses third-party plugins such as: <u>Google Tag Manager</u>, <u>Google Analytics 4</u> and <u>Google Ads</u>, <u>Instagram</u>, <u>Youtube</u>.

The management of these treatments is entrusted to these providers; clicking on them will allow you to view their Privacy Policies.

6. Purpose of processing and legal basis

Your personal data are processed for the following purposes:

- A. To manage and maintain the website;
- B. To allow Users to fill out the contact form;



- C. To manage requests sent from the forms present, including those for the exercise of the rights of the interested parties and as per articles 15-22 GDPR;
- D. To send the newsletter and various commercial communications following the User's subscription;
- E. To use cookies to improve the User's browsing experience;
- F. To carry out personalized marketing campaigns, to carry out remarketing actions, to profile Users;
- G. To manage the "Work with us" session for the indicated purposes of personnel research and selection;
- H. To comply with the obligations provided for by law, a regulation, Community legislation or an order of the Authority;
- I. To prevent or detect fraudulent activities or harmful abuses of the website;
- J. To exercise the rights of the Data Controller, such as the right to defend oneself in court.

The processing of your data, for the pursuit of these purposes, is based on:

- for purposes A, H, I, J on the pursuit of the legitimate interest of the Data Controller in the correct functioning of its Site and the protection of its image and rights, in court or out of court (art. 6, paragraph 1, lett. F of the GDPR);
- for purposes B, C, D, E, F on your explicit consent for each of the purposes (art. 6, paragraph 1, lett. A of the GDPR)
- for purposes B, C, F, G also on the execution of a contract of which the interested party is a party or on the execution of pre-contractual measures taken at the request of the same (art. 6, paragraph 1, lett. B of the GDPR);
- for purpose H, J on the need for the Data Controller to fulfill a legal obligation.

The consent, where required, is freely and explicitly given by ticking the specific box. Consent can always be revoked, without this revocation affecting the lawfulness of previous processing (as required by art. 7 GDPR).

Consent can be revoked by sending a written communication to the Data Controller at the addresses indicated in this information.

## 7. Processing Methods

The personal data collected will be processed both in paper and electronically by employees and/or collaborators of the Data Controller, by companies or external personnel, all previously instructed and trained and, for the latter, prior to the stipulation of an agreement appointing them as external data processors.



The following operations may be carried out: collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

With regard to the processing of data in electronic mode, the Data Controller informs that the data sent through the online forms will be registered and kept updated with the aid of Salesforce, a dedicated platform to which reference is made for the privacy policy: <u>https://www.salesforce.com/company/privacy/.</u>

## 8. Data Access

Your data may be made accessible and processed for the purposes listed above to the following parties:

- employees and collaborators of the Data Controller, in their capacity as authorized data processors and/or System Administrators;
- external parties (e.g., providers for website management and maintenance such as Allibo Recruit and Salesforce -, other suppliers such as Credit Institutions, Professional Firms and Consultants, etc.) that carry out outsourcing activities on behalf of the Data Controller, in their capacity as External Data Processors and/or System Administrators;
- public and private bodies and authorities that operate as independent Data Controllers;
- commercial units in the User's geographical reference area (America, Dubai, Philippines, Russia or China).

In no case will your data be disseminated.

9. Categories of Data Processed

The Data Controller, through the Website, collects and processes personal data - not belonging to special categories pursuant to art. 9 - and data relating to the use of the IT system connected to the Website.

In relation to the services relating to some sections of the Website ("Work with us" and "Contacts"), further data may be processed that the User spontaneously sends. Please remember not to enter special data and/or personal data referring to other persons; unnecessary and irrelevant data will be deleted.



10. Data Transfer

Personal data will be stored on servers located within the European Union owned by the Data Controller and/or third party companies appointed and duly appointed as Data Processors.

It is understood that the Data Controller, if necessary, will have the right to move the location of the servers even to non-EU countries. In such cases, the Data Controller ensures that this transfer will take place in compliance with the applicable legal provisions, including by entering into agreements that guarantee an adequate level of protection and/or adopting the standard contractual clauses provided for by the European Commission.

11. Nature of Data Conferral and Consequences of Refusal to Respond

The Data Controller reminds the User that he is free to confer personal data; the total or partial lack of the data requested in the forms may make it impossible to fully fulfill the requests sent.

Consent for promotional and profiling purposes (purposes D, E, F) is also optional. Any refusal to give consent for these specific purposes will not have negative consequences on the requests sent and on the provision of the services offered on the Website and its related applications; however, it will not allow you to receive promotional or commercial information and will not allow the Data Controller to use your data for any marketing, remarketing or profiling activities.

#### 12. Data Retention Period and Methods

Personal data will be stored in paper and/or electronic/digital form and for the time strictly necessary to fulfill the purposes explicitly stated above, in compliance with your privacy, the principle of necessity and limitation of conservation (Art. 5, paragraph 1, lett. E of the GDPR), as well as any specific legal provisions and the instructions provided by the Guarantor Authority.

The retention periods are listed below.

For purpose A, the User's personal data may be kept for 36 months for security and prevention reasons, connected to the need to control what happens on the site and prevent fraud.

For direct marketing and profiling purposes, personal data is kept for the maximum period provided for by the applicable legislation, respectively until you exercise your right to revoke your consent in case of subscription to the newsletter (in compliance with the Provision of the Guarantor of 15 October 2020) and 12 months for marketing and profiling activities.



Personal data processed by the Data Controller that may be subject to a request for cancellation, will be kept, in protected form and with limited access, solely for the purpose of ascertaining and repressing crimes, for a period not exceeding 12 months from the date of the request and will subsequently be deleted.

Traffic data, excluding the content of communications, will be stored for a period not exceeding 6 years from the date of communication, pursuant to art. 24 of Law n. 167/2017, which transposed EU Directive 2017/541.

13. "Work with us" Section

The Data Controller provides the "Work with us" page to inform Users of any open professional positions within the company and to give them the opportunity to send a spontaneous application.

In both cases, the Data Controller confirms, also for the processing of data collected in this way, the application of the principles of confidentiality, necessity, relevance, and limitation.

This data will be managed with the aid of Allibo Recruit, a platform dedicated to recruiting services, to which reference is made for more detailed information on the processing of personal data: <u>https://www.azibo.com/privacy-policy</u>

#### 14. Sending the Newsletter

To subscribe to the newsletter, it is necessary to fill out the dedicated form on the Website.

Subscription allows you to receive, automatically and free of charge via email, communications of an informative, promotional, commercial, institutional and/or cultural nature.

The data processed for this purpose are name, surname, email address.

The User always has the right to cancel his/her subscription using the unsubscribe option present in the newsletter or by sending an email to the following address: gdpr@zamperla.it

#### 15. Data Subject's Rights

As a data subject, you may at any time exercise, within the limits of the current legislation, the rights listed below and provided for by the GDPR in articles 15 and following. Therefore, the data subject is informed that:

a. he/she has the right to ask the Data Controller for access to personal data, rectification or erasure thereof or restriction of processing concerning him/her or to object to processing in the cases provided for; b. he/she has the right to lodge a complaint with the Data Protection Authority - in Italy - if the competent Authority, following the procedures and indications



published on the Authority's official website: <u>https://www.garanteprivacy.it/;</u> c. he/she has the right to contact the competent Authority in his/her own Country to receive complaints regarding the processing of personal data, in accordance with the legal provisions in force in that country; d. any rectification, cancellation or limitation of processing carried out at the request of the data subject - unless this proves impossible or involves a disproportionate effort - will be communicated by the Data Controller to each of the recipients to whom the personal data have been transmitted.

16. How to Exercise Your Rights

These rights can be exercised at any time by sending a request to the Data Controller, contacting them by means of:

**Contact Methods** 

- Address Antonio Zamperla S.p.A. 36077 Altavilla Vicentina (VI) Italy, Via Monte Grappa 15/17
- Registered Mail Antonio Zamperla S.p.A. 36077 Altavilla Vicentina (VI) Italy, Via Monte Grappa 15/17
- Email gdpr@zamperla.it
- PEC zamperla@legalmail.it
- Phone +39 0444 998400

The response will be given within 30 days, which may be extended by another 30 days in case of particularly complex requests.

The exercise of rights is not subject to any form of constraint and is free of charge.

Only in the case of requests for further copies of data requested by the data subject, a reasonable fee may be charged based on administrative costs. If the data subject submits the request by electronic means, and unless otherwise indicated by the data subject, the information is provided in a commonly used electronic format.

In the event that you decide to contact the Data Controller by telephone, you will receive the necessary instructions on how to exercise your rights.

#### 17. Data Controller

The Data Controller is Antonio Zamperla S.p.A. with registered office in 36077 Altavilla Vicentina (Vi), Italy, Via Monte Grappa 15/17, tel. +39 0444 998400, email: gdpr@zamperla.it.

18. Changes to this Privacy Policy



This Privacy Policy may be subject to change. Therefore, it is advisable to regularly check this Privacy Policy and refer to the most updated version.

