

PRIVACY POLICY

INTRODUCTION

This policy applies to this website owned and operated by ILLVA SARONNO HOLDING S.p.A. ("**Website**") and does not apply to any third-party websites that the user may access via links.

This policy is intended for all individuals who interact with the web pages of the Website, both those who use the Website without registering and those who, following a specific procedure, register on the Site and use the online services provided through it.

This policy is provided in accordance with Article 13 of EU Regulation 2016/679, *the General Data Protection Regulation* (the so-called "GDPR") and the applicable provisions on the protection of personal data.

Please also note that any third-party websites accessed via links on this Website are governed by a separate privacy policy from this one and are not covered by it.

1. WHO PROCESSES PERSONAL DATA?

The data controller is ILLVA SARONNO HOLDING S.p.A. having registered offices in Via Archimede, 243 - 21047 Saronno (VA), VAT no. 01543660128 ("**Company**" or "**Data Controller**").

2. WHAT DATA IS PROCESSED?

In addition to any other provisions set out on other pages (in particular regarding "Cookies"), the following data relating to visitors or registered users of the Website (collectively "**Users**") may be collected and processed through the Website and the use of its features and/or subscription to the services provided therein:

- **browsing data**: this is the data that the server automatically records on every visit to the website, such as the IP addresses or domain names of the computers used by users connecting to the Website, the URI (*Uniform Resource Identifier*) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. This category also includes "Social Buttons" which solely enable users to link to and view the Company's social media profiles and those of its brands (created on social networks such as, by way of example, Facebook, Instagram and YouTube). These "buttons" allow users browsing the Website to access the Company's social networks directly with a single "click". Interactions taking place within the social network are in any case subject to the rules and privacy settings of the respective social networks;

- **personal data provided voluntarily by users/visitors**: this refers to data provided by users by completing electronic forms, if any, to request information, such as first name, surname, email address, telephone number and any further data or information contained in messages sent to the contact details indicated on the Website or by completing forms published there, such as newsletter subscriptions.

3. FOR WHAT PURPOSES AND ON WHAT BASIS IS THE DATA PROCESSING CARRIED OUT?

Illva Saronno Holding S.p.A

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Partita IVA: 01543660128 - C.C.I.A.A. R.E.A. 189430 - C.P.: 108



The processing of personal data is carried out exclusively for the following purposes:

- (i) to fulfil contractual or pre-contractual obligations – for the proper provision of the services requested or otherwise accessible via the Website, as well as to manage and process the enquiries and requests submitted by the user and to fulfil all obligations arising from contractual and pre-contractual relationships with the user. This purpose expressly includes the fulfilment of all obligations, including those of an administrative and accounting nature, connected with or arising from the establishment of a contractual relationship or from an existing contract, including assistance regarding requested products/services and the sending of communications, by email or telephone (always via systems with an operator), for these purposes;
- (ii) to comply with legal obligations – the processing of data may be necessary or required to fulfil obligations arising from laws or regulations, whether national and/or EU, in force and applicable to the Data Controller, as well as from instructions issued by competent authorities and bodies;
- (iii) for the purposes of pursuing a legitimate interest of the Data Controller – the Data Controller has a legitimate interest in processing personal data, in the context of relations and dealings with data subjects, for the defence of a right or interest before any competent authority or body, expressly including for the purposes of debt recovery, as well as to make direct offers of products or services similar to those previously purchased, limited to the email addresses provided in the context of the contractual relationship and subject to the user's objection to such processing (so-called 'soft spamming');
- (iv) on the basis of the user's consent (optional and revocable at any time) for the performance of promotional activities, other than those referred to in point (iii) above, and, in particular, for the sending of the newsletter, whether provided.

In relation to the above, please note that you may, at any time, withdraw the consent given, freely and without charge, as well as object to commercial communications received via email by clicking on the appropriate link at the bottom of the emails themselves or by sending a communication in accordance with the procedures set out in the following paragraph 9.

It is understood that any subsequent withdrawal of consent does not affect the lawfulness of the data processing carried out prior to such withdrawal.

4. IS IT MANDATORY TO PROVIDE PERSONAL DATA?

The provision of data for the purposes referred to in point (i) (fulfilment of contractual obligations) is necessary to enable navigation of the Website and the use of the services offered through it, with the consequence that failure to provide, or the partial or incorrect provision of, the data in question will make it impossible, as the case may be, to use the requested services and to process and fulfil specific user requests.

5. TO WHOM MAY THE DATA BE DISCLOSED?

The data may be disclosed to the following categories of recipients:

- to all those parties (including public authorities) who have access to personal data pursuant to regulatory or administrative provisions;
- to all those entities, public and/or private, natural and/or legal persons, to whom disclosure is necessary or functional to the proper fulfilment of a contractual or legal obligation.

In addition to the above, within the limits and for the purposes indicated in the preceding paragraphs, personal data may be disclosed to parties acting on behalf of the Company, such as, by way of example and without limitation:

- companies, consultants or professionals who may be appointed to install, maintain, update and, in general, manage the hardware and software infrastructure of the Website;
- companies responsible for processing and sending informational or commercial communications and/or organising promotional and/or marketing campaigns on behalf of the Company;
- to the Company's legal and tax professionals and advisers;
- to companies, consultants or professionals who may be appointed to provide services complementary to those offered by the Company and requested by the user;
- to other companies belonging to the Data Controller's business group

who will process them, as appropriate and subject to the necessary assessments of the specific case, in their capacity as independent data controllers, joint controllers or data processors.



Data may also be shared with persons authorized by the Data Controller to process data who have undertaken to maintain confidentiality or are subject to an appropriate legal obligation of confidentiality (for example, staff in the Company's marketing department).

Personal data will not be transferred to countries outside the EU or the European Economic Area. Should data need to be transferred, exclusively for the purposes described above, to countries outside the EU or the EEA, this will take place in compliance with the limits and conditions set out in the GDPR, such as – in particular – the adoption of Standard Contractual Clauses approved by the European Commission or the selection of data processors operating in countries for which the European Commission has issued an adequacy decision, in any case subject to the adoption of all measures required not only by law but also by best industry practice.

6. HOW LONG IS PERSONAL DATA RETAINED?

Personal data will be retained for the entire duration of the contractual relationship or, in any event, for the time necessary to process, fulfil and manage any requests from Users and, subsequently, for the maximum period provided for by the applicable legal provisions regarding the limitation of rights and/or the expiry of legal actions, including in the administrative and tax fields (for example, 10 years) and, in general, for the exercise/defence of the Data Controller's rights in disputes brought by public authorities, public bodies and private entities.

For processing based on the Data Controller's legitimate interest, the data will be retained for as long as such interest subsists and, in any event, provided there is an active relationship with the data subject, without prejudice to the latter's right to object at any time to such processing on grounds relating to their particular situation.

In the case of processing based on consent, the data will be retained until the User withdraws their consent. Once the purposes justifying the retention of personal data have been fulfilled, such data will be deleted.

7. IS THE WEBSITE ALSO AIMED AT MINORS?

Given the business of the Company, the Website is not intended for minors, defined as persons under the age of 18. Minors are not permitted to provide personal information or data without the consent of those exercising parental responsibility over them. Should the Company become aware that personal data has been provided by a minor (under the age of 18), the Company will immediately destroy such data or request the provision of specific consent from the parents (or the person exercising parental responsibility), and reserves the right to deny access to the services available on the Website to any user who has concealed their minority or who has otherwise provided their personal data without the consent of their parents (or the person exercising parental responsibility). This is without prejudice to any contrary provisions of law.

9. WHAT ARE THE DATA SUBJECT'S RIGHTS?

As a data subject, the User has the right to request that the Data Controller exercise the following rights: (i) to access the data and specific information regarding the processing, such as, by way of example, the purposes, the categories of data being processed, the existence of the other rights set out below, and to request a copy of the data itself, (ii) to rectify the data, (iii) to have the data erased without undue delay in the cases provided for by the GDPR, such as in the event of objection to the processing and where there is no overriding legitimate interest for the processing on the part of the Data Controller (this right does not apply if the processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims), (iv) to request the restriction of processing, (v) to object at any time, on grounds relating to their particular situation, to processing based on a legitimate interest of the Data Controller, (vi) to receive the data in a structured, commonly used and machine-readable format (portability) and to transmit it to another data controller in the cases provided for by the GDPR; (vii) withdraw, at any time, any consent previously given. The data subject also has the right to lodge a complaint with the Supervisory Authority (www.garanteprivacy.it) pursuant to Article 77 of GDPR, should they consider that the processing of data is contrary to the legislation in force.

The above rights may be exercised by submitting an informal request to the Data Controller. The request may be sent to the Data Controller at the address indicated above or by emailing privacy@disaronno.it.

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This Privacy Policy may be subject to changes and updates, including in response to changes in applicable legislation.

Any changes or updates will be brought to the User's attention by publication on the Website's home page and will be applicable and binding from that moment onwards.

The Company therefore invites users to visit this page periodically to keep abreast of any changes or updates.

Last updated: May 2026