

PRIVACY POLICY

Veroniki Holding S.p.A. (hereinafter also the "Company") strongly believes that transparency is at the basis of the relationship with its customers and users. For this reason, it wants to apply the maximum clarity how to use personal data.

It is described below how to manage the Web site, in reference to the processing of the personal data of the users who consult it.

This is a statement that is also made in accordance with art. 13 of the 2017/679 Regulation (EU) "*Protection of natural persons with regard to the processing of personal data and the free movement of such data*" (hereinafter also "GDPR") to those interacting with the company's web services, accessible through telematics way starting from the address <http://veronikiholding.com> corresponding to the homepage of the company's official website (hereinafter only the "site").

The Privacy Policy is also inspired by Recommendation No. 2/2001 that the European authorities for the protection of personal data, gathered in the group established by the art. 29 of Directive No 95/46/EC, adopted on 17 May 2001, to identify certain minimum requirements for the collection of personal data on-line, and, in particular, the modalities, timing and nature of the information which the holders of the treatment must provide to the users when they are connected to web pages, irrespective of the purposes of the link.

1. Holder of personal data and Data Protection Officer

The owner of the data processing is the company, with legal office in Via Larga 9/11, Milan (Italy) in the person of the legal representative *pro tempore* domiciled at the headquarters of the company. External managers have been appointed to whom the data are communicated for the different purposes of the processing. The complete list of data processing controllers can be requested contacting the owner at the following addresses: via e-mail: privacy@veronikiholding.it, via mail: Veroniki Holding S.p.A. Via Larga 9/11 – 20122 Milan.

In accordance with art. 37 of the Privacy policy, the company has also appointed a data protection officer (*i.e. Data Protection Officer-"Dpo"*), contactable at the following addresses: via e-mail: giacomo.cardani@dcpartners.it; Via mail: Via San Vittore al Teatro 3, 20123 Milano c/o Development Compliance & Partners S.r.l.

2. Place of personal data processing

The processing connected to the web services of the site takes place at the headquarters of the company in Via Larga 9/11, Milan and are treated only by technical staff of the office in charge of the treatment.

For different specific services, the related data are processed by specialized companies, appointed by Responsible for processing, according to art. 28 of GDPR.

3. Type of data processed

Browsing data

The computer systems and software procedures used to operate the site acquire, during their normal exercise, some personal data whose transmission is implied in the use of Internet communication protocols.

This information is not collected to be associated with identified stakeholders, but by their nature could, through processing and associations with data held by third parties, allow to identify users.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the addresses URI notation (Uniform Resource Identifier) of the requested resources, the time of the request, the method used when submitting the request to the server, the file size obtained in response, the numeric code indicating the status of the response given by the server (good end, error, etc.) and other parameters related to the operating system and the computer environment of the user.

This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and for controlling its correct functioning and is deleted immediately after processing. The data could be used for the assessment of liability in case of hypothetical computer crimes against the site.

Data provided by the user

The optional, explicit and voluntary sending of e-mails to the addresses indicated on the site implies the subsequent acquisition of the address of the sender, necessary to answer the requests, as well as any other personal data entered in the missive.

Some specific services require the issue of personal data.

4. Purpose and legal basis for the processing of data

Understanding the information specified for the navigation data referred to in section 2.1), the personal data provided by the users through the site are treated for the following purposes:

- a) allow the conduct of operations strictly connected and instrumental to the management of the relations with the users, such as - merely an example-the management for the selection of the staff of the CV (curriculum vitae) and other relevant information sent by the user;
- b) allow the correct execution of the contractual obligations assumed by the company towards users and customers and vice versa, as well as the consequent accounting and fiscal fulfilments;
- c) allow the fulfilment of obligations under Community laws, rules and regulations, or provisions issued by authorities which are legitimated by law and by supervisors and control bodies;
- d) the purpose necessary to ascertain, exercise or defend a right in judicial proceedings or whenever the jurisdictional authorities exercise their judicial functions;
- e) purpose of statistical research/analysis on aggregate or anonymous data, without therefore the possibility of identifying the user, aimed at measuring the operation of the Site and its operational functions, including the resolution of any technical problem

The legal basis for the processing of personal data for the purposes referred to point a) is the provision of a service or a response to a request, which does not require the consent of the users, in accordance with the applicable legislation.

As for the purposes B), C) and D), the treatment is necessary for the pursuit of a legitimate interest of the company.

As far as the purpose of point E) is concerned, it does not involve the processing of personal data.

It is always possible to revoke the consent to the processing of the data with this purpose, even in a disjoint way, for example, to decide to receive advertisements only through postal service and not through automated systems.

5. Consent to Data processing

Except as specified for the navigation data, the user is free to provide his personal information and consent to the various treatments listed in this Privacy Policy.

6. Link to other websites

The website of the company Veroniki Holding S.p.A. includes links to the websites of other companies of the Veroniki holding S.p.A. Group.

Such companies might gather information about the user when interacting with their content, advertising, and services.

7. Method of processing and conservation time

Personal data is processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use, and unauthorized access.

8. Scope of communication and diffusion of data

For the purpose of pursuing the above objectives, the personal data conferred will be processed only by persons entrusted by the company, i.e. employees, collaborators and internal and external consultants of the company appointed in writing as appointees or internal and external data processing managers and to whom specific instructions have been given for this purpose.

The user's personal data may also be communicated and transferred to persons whose the right to access to personal data is recognized by legal provisions and secondary legislation or by provisions issued by authorities to that legitimated by law .

Finally, the personal data of the user may be shared, used and transferred within the companies belonging to the group Veroniki Holding S.p.A. in relation to the purposes for which the information has been collected. These Parties will ensure adequate protection of individuals with regard to the processing of their personal data.

9. Rights of the interested parties

The subjects to whom the personal data refer have the right at any time to obtain confirmation of the existence of the same data and to know the contents and the origin, verify its accuracy or request its integration or the update, or rectification (art. 15 ss. GDPR).

Under the same article there is the right to request the cancellation, transformation into anonymous form or the blocking of the data processed in violation of the law, and to oppose in any case, for legitimate reasons, to their treatment.

Requests should be made by e-mail at: privacy@veronikiholding.it, via mail: Veroniki Holding S.p.A. Via Larga 9/11 – 20122 Milan.

10. Modifications

The company reserves at any time to modify, also due to changes in the applicable law, the Privacy policy by updating this page. The user is therefore required to periodically check the Privacy Policy to become aware of related updates.

This Privacy Policy Rev. 00 was issued on date 23/01/2019 and is starting from the same day.
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