

PRIVACY NOTICE FOR NEWSLETTER, DIRECT MARKETING, AND DATA PROFILING

Pursuant to Article 13 of Regulation (EU) No. 2016/679 of the European Parliament and of 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 (General Data Protection Regulation, hereinafter referred to as "Regulation" or "GDPR"), which repeals Directive 95/46/EC, we inform you that the personal data you voluntarily provide to ICI CALDAIE S.p.A. will be processed in compliance with the current legislation on personal data protection and the principles of confidentiality that inspire the company's activity.

1. DATA CONTROLLER

The Data Controller is ICI Caldaie S.p.A., Via G. Pascoli 38 - 37059 Frazione Campagnola di Zevio (Verona), Italy, phone: +39 045 8738511, email: info@icicaldaie.com.

2. PERSONAL DATA

The processing will involve the following personal data:

- contact data (such as email and phone number);
- personal data (such as first name, last name, date of birth, gender, profession);
- computer information (IP addresses, cookie data).

3. PURPOSE OF DATA PROCESSING

Your personal data will be processed for the purpose of sending commercial and technical communications and direct marketing activities by ICI CALDAIE S.p.A., including newsletters, promotional and advertising materials, and communications related to training courses, conferences, and promotional, cultural, or scientific events offered or sponsored by ICI CALDAIE S.p.A. via automated means, postal mail, telephone calls through operators, and other informational materials, in full compliance with the principles of lawfulness and correctness, and the legal provisions.

Providing your personal data is optional. However, without the data marked as "mandatory" in the form above and your specific consent, the service cannot be provided to you.

The Controller uses systems for sending newsletters and promotional communications with reports to compare and improve the results of communications. Reports may include data such as the number of readers, openings, unique clicks, and clicks; devices and operating systems (Windows, Apple, Linux, Android...) used to read the communication; details on individual user activity; list of pending users who have not yet confirmed their subscription; details of emails sent by date/time/minute; details of delivered and undelivered emails; list of newsletter unsubscribers; users who opened an email or clicked on a single link; users with display problems; link tracking (number of clicks on message links); click tracking (which links were clicked and by whom). This data is used to compare and possibly improve the results of communications.

With your free, optional, and revocable consent at any time, the Controller may process your personal data related to your preferences, habits, interests, behaviors, purchased products/services, responses to market research, use of online services, and/or browsing within the ICI Caldaie website for profiling

purposes, i.e., to analyze and/or predict your habits and consumption choices. Profiling involves processing data to create groups of consumers divided by specific characteristics (so-called “clusters”). Your Personal Data is processed to offer you products and services offered by the company that match your preferences as closely as possible. You can withdraw your consent at any time by emailing privacy@icicaldaie.com or sending a registered letter to ICI CALDAIE S.p.A. – Via G. Pascoli 38 - 37059 Frazione Campagnola di Zevio (Verona).

The legal basis for the processing is your consent (Article 6.1, letter a) GDPR).

4. LEGAL BASIS OF DATA PROCESSING

The processing of Data for the purpose indicated in point 3) above is based on your specific consent, which you are free to give or not, and which may be withdrawn at any time.

5. PROCESSING METHODS

Your Data will be processed using suitable paper, electronic, and/or telematic means, in compliance with the legal provisions on personal data processing, adopting appropriate security measures to ensure the security and confidentiality of the data. Processing will also be carried out using cookies. Therefore, processing will be performed through automated systems in accordance with Articles 6 and 32 of the GDPR, adopting appropriate security measures.

Your Data will also be managed by trained and instructed personnel.

Communications will be managed through communication platforms for sending newsletters by companies such as SurveyMonkey, MailChimp. Following your consent to the communications, your identifying data will be stored on their servers; for further information, please consult **SurveyMonkey's** privacy policy at the following link:

<https://uk.surveymonkey.com/mp/legal/>

Please consult **MailChimp** privacy policy at the following link:

<https://www.intuit.com/privacy/statement/>

6. COMMUNICATION AND DISCLOSURE OF DATA

Your Data will be communicated to defined entities. Specifically, within the limits strictly relevant to the purpose indicated in point 3) above, your Data will be communicated to:

- authorized internal personnel of the company;
- entities providing services for the management of the information system and telecommunication networks, including email, newsletter, and website management. These entities will act as data processors appointed pursuant to Article 28 of the GDPR. The updated list of Data Processors is available at the Data Controller's headquarters.

7. RETENTION PERIOD

Your Data will be stored for a period not exceeding the achievement of the purposes for which they are processed, fully respecting the storage limitation principle set forth by the Regulation.

Specifically, your Data will be retained for the duration of the newsletter service until consent is revoked.

8. RIGHTS OF THE DATA SUBJECT

Regarding your Data, you have the rights indicated in Articles 15-22 of Regulation (EU) No. 2016/679. Among others, you have the right to obtain from the Company, according to the Regulation's terms:

- confirmation of whether or not personal data concerning you exists, even if not yet registered, and its communication in an intelligible form;
- indication of the origin of personal data, purposes and methods of processing, the logic applied in case of processing carried out with electronic tools, identification details of the controller and processors, and the entities or categories of entities to whom personal data may be communicated or who may learn about them as designated representatives, processors, or authorized persons;
- updating, rectification, and integration of Data;
- deletion, anonymization, or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which it was collected or subsequently processed;
- restriction of processing under certain circumstances, such as if you dispute the accuracy of the Data and need to verify its correctness;
- portability, i.e., the right to receive, where applicable, in a structured, commonly used, and machine-readable format, the Data and transmit those Data to another data controller;
- objection to processing, where applicable.

You can unsubscribe from the newsletter at any time by selecting the "unsubscribe" option at the bottom of each newsletter received. You also have the right to withdraw any consent given concerning direct marketing and profiling.

9. HOW TO EXERCISE YOUR RIGHTS

You can exercise the rights mentioned in point 8) above by contacting us via email at privacy@icaldaie.com or sending a registered letter to ICI CALDAIE S.p.A. – Via G. Pascoli 38 - 37059 Frazione Campagnola di Zevio (Verona).

The response time is one (1) month, extendable by two (2) months in case of particular complexity; in such cases, ICI CALDAIE S.p.A. will provide at least one interim communication within one (1) month. The exercise of rights is, in principle, free of charge except for manifestly unfounded or excessive (including repetitive) requests, for which a fee may be charged.

10. COMPLAINTS

If you are not satisfied with our response, you can contact the Data Protection Authority (Garante per la protezione dei dati personali): Piazza di Monte Citorio, 121 – 00186 Rome, Phone: +39-06-6967 71 / +39-06-6967 72917, Email: urp@gpdp, according to the methods indicated on the Authority's website at www.garanteprivacy.it.



11. DATA TRANSFER ABROAD

Your Data will be stored at the Company's headquarters and on servers located within the European Union and the United States.

12. UPDATES

This notice is effective upon its publication. To best meet any knowledge needs regarding privacy and to comply with sector regulatory developments, this notice may be subject to updates and changes.

ICI CALDAIE S.p.A.

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icaldaie.com

I dati personali sono trattati in conformità a quanto previsto dal GDPR (UE) 679/2016. L'informativa completa nel sito www.icaldaie.com
Personal data are processed in accordance with the GDPR (UE) 679/2016. Complete information on www.icaldaie.com

Company certified according to ISO 9001, ISO 14001 & ISO 45001