

## PRIVACY POLICY

Pursuant to Article 13 of EU Regulation 679/2016 ("GDPR") and Italian Legislative Decree 196/2003 as amended, the Data Controller for the processing of your personal data, Jakala S.p.A. S.B., having its registered office at Corso di Porta Romana 15, 20122 Milan (MI), Tax identification no. and VAT registration no. 08462130967 ("Jakala") wishes to inform you that the personal data that you will provide or that you have provided when purchasing one or more products on the <https://www.ivecofanshop.com> e-commerce website (the "Site") will be processed in accordance with principles of correctness, lawfulness and transparency, respecting your privacy and applicable law, putting in place the processing necessary to achieve the purposes referred to in paragraph 2 below.

### 1. Data processed and data subject categories

Personal data subject to processing may include:

- a) identifying data (such as first and last name, date of birth);
- b) contact information (phone number, e-mail address, shipping address);
- c) billing information;
- d) any additional data required to complete purchase of products on the Site.

The personal data belongs to the following categories of data subjects: users who make a purchase on the Site.

### 2. Purpose and legal basis for data processing

Personal data provided voluntarily when making a purchase on the Site is processed in order to:

- a) allow us to present you with commercial offers on the Site and to carry out the necessary activities for the performance of the sales agreement that may have been concluded, including those of payment management, invoicing, shipping and online purchase assistance. The legal basis for processing is based on the need to perform contractual services and comply with legal obligations;
- b) to enable us to send you communications related to service management (e.g., order confirmation, shipping confirmation). The legal basis for processing is based on the need to perform contractual services;
- c) to enable us to respond to your assistance requests related to orders placed on the Site. The legal basis for processing is based on the need to perform contractual services.

The provision of your data for the above-mentioned purposes is free of charge, but necessary in order to allow us to perform the tasks required in connection with the conclusion and execution of the sales agreement, or to receive replies to your requests for assistance with regard to purchases made. If you fail to provide the requested personal data, it will be impossible for us to enter into the contractual relationship and perform it in a timely manner.

### 3. How data is processed

Your personal data will be processed manually, by computerised means and electronically, so as to guarantee data security and confidentiality. Prevention and protection systems are used, continuously updated and checked for reliability.

### 4. Data subject categories to whom the data may be disclosed

To pursue the purposes indicated above, Jakala may communicate and have its personal data processed by its employees and contractors, duly authorised to carry out the processing, and/or third parties that provide services upon Jakala's request, duly appointed as data processors. These subjects are entitled to process the data within the limits of their competence and in accordance with the instructions given to them by the Controller.

Your personal data may also be disclosed to third parties to comply with legal obligations or in order to perform the contractual relationship (payment service companies, shipping companies, etc.).

Your personal information will not be shared.

### 5. Duration of processing and storage of personal data

The processing of your personal data will last no longer than is necessary to fulfil the purposes for which it was collected. Specifically, for the purposes stated in the paragraph "Purposes and legal bases of data processing," data will be retained for as long as necessary to fulfil the product sales contract, fulfil the service request, and/or for as long as necessary for tax and legal purposes.

### 6. Data Protection Officer (DPO)

Please note that pursuant to Article 37 of the GDPR, Jakala has designated Emanuela Astori as Data Protection Officer (DPO). She may be contacted via the following e-mail address: [privacy@jakala.com](mailto:privacy@jakala.com).

## **7. Data subject rights**

We inform you that, in relation to the processing referred to above, you may exercise your rights under Articles 15 and ff. of the GDPR. Specifically, you will have the right to:

1. access to their personal data: specifically, data subjects have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them exists, as to whether or not the data is being processed and to obtain access to their personal data, as well as to obtain information regarding the origin of the data, the categories of data being processed, the purposes of processing, the means of processing, the recipients of the data, the data storage period, any transfers to third countries, etc.;
2. request the rectification of their personal data without undue delay, as well as the supplementation of incomplete personal data, including by providing a supplementary statement;
3. obtain the erasure of personal data, without undue delay, if:
  - a. personal data are no longer necessary with respect to the purposes of processing;
  - b. the consent on which the processing is based is withdrawn and there is no other legal basis for the processing;
  - c. the personal data have been unlawfully processed;
  - d. personal data must be deleted to comply with a legal obligation.
4. obtain restriction of processing, in cases where the accuracy of personal data is disputed (for the period necessary for the data controller to verify the accuracy of such personal data), if the processing is unlawful and/or the data subject has objected to the processing;
5. where applicable, object, at any time, to the processing of personal data that have as their legal basis for processing a legitimate interest of the Controller;
6. receive personal data in a structured, commonly used and machine-readable format and to transmit such data to another data controller, only for cases where the processing is based on consent or contract and only for data processed by electronic means (known as the right to data portability);
7. where applicable, at any time withdraw their consent, if processing is based on that legal basis (withdrawal of consent will not affect the lawfulness of processing based on consent before it was withdrawn);
8. lodge a complaint with a supervisory authority, without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with the supervisory authority of the Member State where they habitually reside or work, or of the Member State in which the alleged infringement occurred, if the data subject considers that the processing of personal data relating to him or her infringes Privacy Laws.

To assert your rights, you may send a written request, indicating "Privacy – Exercise of Privacy Rights" in the subject line, by e-mail at [privacy@jakala.com](mailto:privacy@jakala.com).