

Privacy Policy of OSD GRUPPO ECOTECH SRL

Dear user,

First of all, thank you for visiting us.

We value the fact that you can trust us and therefore we want to share with you in this page the purposes and methods of processing personal data that we collect during your browsing, following your eventual registration on the site (hereinafter "Site") or the mobile application (hereinafter "APP") and with the use of the services we offer, as better specified below.

When you browse our site, you can register

(<http://www.osdgroup.it/eng/registration.asp>) or decide not to do so.

Registration is optional and allows access to some sections of the site and to take advantage of various services such as: participate in prize events, receive communications and offers, and many other services. Registration with one of the sites dedicated to the various brands of the **O.S.D. GRUPPO ECOTECH SRL** allows you to be registered directly to other sites **O.S.D. GRUPPO ECOTECH SRL**.

The processing of your personal data is always based on principles of lawfulness and fairness in compliance with all applicable regulations. Below you will find all the details on the processing of your personal data.

We are available to answer your questions. At this link you can find all the ways to contact us: http://www.osdgroup.it/contatto_siti_privacy_osd_eng.aspx

Last Update 04/06/2018

INFORMATION NOTE ON PRIVACY POLICY

The data controller is **O.S.D. GRUPPO ECOTECH SRL**, located in Campogalliano, Via Ponte Alto, 10 - 41011 with the following contact details:

http://www.osdgroup.it/contatto_siti_privacy_osd_eng.aspx

O.S.D. GRUPPO ECOTECH SRL will process your Personal Data in compliance with EU Regulation no. 2016/679 and of the national legislation concerning the protection of personal data (hereinafter "Privacy Law").

» WHAT PERSONAL DATA WE TRAIN AND HOW WE COLLECT THEM

Your browsing on the Site and / or access to certain sections of the Site or the APP may result in the collection and subsequent further processing of your Personal Data by **O.S.D. GRUPPO ECOTECH SRL**. In fact, during the connection to the Website / APP, the computer systems and software procedures set up for their operation provide and / or acquire automatically and indirectly some information (such as, by way of example, the so-called "cookies", as specified in the " Note Privacy Policy - Cookie ", which is at the end of this statement," IP "addresses, domain names of the computers used by users who connect to the Website / APP, the addresses in" Url "notation of the requested resources, time of request to the server).

In particular, the collection of your Personal Data may take place:

- by filling in online forms on your part;
- through your registration via social log-in; is
- through the publication by you of Contributions (as defined below), the content of which may include your Personal Data conferred directly by you, on social networks managed independently by third parties, such as, but not limited to, Facebook, Twitter , etc. (hereinafter "Social Network"). By "Contributions" we mean the images, the comments, the effect phrases associated with the subject matter of the Website / APP, the contents and any other information you have conceived and published on the Social Network pages dedicated to products of the various **O.S.D. GRUPPO ECOTECH SRL**, including the image that you may confer. The publication of the Contributions can also be made through a pseudonym ("nickname") you have chosen during registration on the Site / APP, and possibly to the image that you have associated with your nickname. In choosing the nickname and any associated image, you remain solely responsible for any bias that the use of the nickname or image may cause to third parties.

In the event that you choose to register on the Site / APP or to send a request through the "Contact / Contact Us" section of the Website / APP, the provision of some Personal Data is necessary for **O.S.D. GRUPPO ECOTECH SRL** can meet your needs within the functionality of the Site / APP, so the relevant fields of the registration form are marked with an asterisk or are otherwise marked as mandatory. The provision of Personal Data not marked with an asterisk or otherwise marked as mandatory is merely optional and the failure, partial or incorrect conferment of such Personal Data does not result in any consequence. However, failure to provide, in part or inexact, the Personal Data marked with an asterisk or otherwise marked as mandatory does not make it possible to perform the services you have requested. In the event that you have omitted to provide one or

more compulsory Personal Data, an error message will appear from **O.S.D. GRUPPO ECOTECH SRL** which clearly identifies the list of missing mandatory Personal Data.

» What are the purposes of the processing of your Personal Data and its legal basis

According to the needs from time to time manifested by accessing the various sections of the Site / APP (and except for individual initiatives that involve the provision of specific Personal Data, for which will be published from time to time on the Site / APP specific information), following are the purposes of the processing of your Personal Data and the related legal bases.

Your Personal Data will be processed for the following purposes only with your consent to the processing, which may be revoked at any time by deleting your profile, using the link at the bottom of each promotional e-mail (regarding marketing and the newsletter) or according to the methods from time to time indicated by the Data Controller when the consent is collected:

a) Management of and response to your requests

You can decide to give consent to the processing of your Personal Data for the management and response, by **O.S.D. GRUPPO ECOTECH SRL**, to your requests in relation to products and initiatives of the various brands of the **O.S.D. GRUPPO ECOTECH SRL**, to advertising, or to the Site / APP ("Contact / Contact Us" section of the Website / APP). In relation to this purpose, your consent is required at the time the requests are sent. In the event that you decide not to give consent to the processing of your Personal Data for the aforementioned purposes it will not be possible to continue with the sending of your request.

b) Marketing activities

You may decide to give consent to the processing of your Personal Data for marketing purposes, ie for commercial communications, including by e-mail, text message and push notification, concerning the sending of promotional and advertising material relating to any brand of the **O.S.D. GRUPPO ECOTECH SRL** or the completion of market research. In relation to this purpose, your consent is required at the time of registration to the Website / APP. In the section of your personal profile on the Website / APP, you can choose which channels you prefer to receive commercial communications (for example, all or some of e-mail, text messages, ordinary mail, push notification) and choose the **O.S.D. GRUPPO ECOTECH SRL** of your interest.

c) Profiling activity

You can decide to give consent to be subjected to profiling, ie to the analysis of your habits and / or consumption choices as well as the comparison of your Personal Data present in the various databases of or in use to **O.S.D. GRUPPO ECOTECH SRL**, for example for the purpose of sending personalized promotional communications, customizing the content displayed on the Website / APP, publication of banners and statistical surveys. There are various activities that can contribute to the creation of your profile, for example the participation or not to the prize events, the interaction with the Site / APP, the purchase of products of the various brands of the group **O.S.D. GRUPPO**

ECOTECH SRL or the publication of Contributions on the pages of the Social Network dedicated to products of the various brands of the **O.S.D. GRUPPO ECOTECH SRL**. In relation to this purpose, your consent is required at the time of registration to the Website / APP.

d) Receiving the newsletter

You can decide to subscribe to the newsletter service dedicated to a specific brand of the **O.S.D. GRUPPO ECOTECH SRL**. In relation to this purpose, your consent is required at the time of subscription to the newsletter service.

Furthermore, even without your consent, **O.S.D. GRUPPO ECOTECH SRL** may process your Personal Data for the following purposes:

i) management of your registration on the Site / APP and activities related to the activation and use by you of the services offered therein, to your interaction with the Site / APP and with the sections present in it (for example, access to reserved areas of the Site / APP as well as publication of Contributions on the pages of Social Networks dedicated to products of the various brands of the **O.S.D. GRUPPO ECOTECH SRL**), including the sending of e-mails "Transactional", connected to the registration procedure to the Site / APP and to the maintenance of your active account (as a necessary treatment for the execution of a contract or pre-contractual measures);

ii) management of your eventual participation in prize events, including the evaluation, assignment and communication of both the offer of bonus points and bonus points and the opportunities for the accumulation of the same (by sending e-mails "transactional", related to your possible participation in the promotion) as well as the awarding of prizes (as a treatment necessary for the execution of a contract or pre-contractual measures);

iii) management and execution of the obligations required by law (accounting, administrative, fiscal, etc.);

iv) management of disputes and possible disputes (as legitimate interest of the owner).

» How we process your Personal Data

The processing of your Personal Data may include any type of operation, including collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction.

Your Personal Data will be processed in a mainly automated but also paper format, with logic strictly related to its purposes, through the databases, the electronic platforms managed by **O.S.D. GRUPPO ECOTECH SRL** or third parties appointed for this purpose external processing and / or integrated IT systems of **O.S.D. GRUPPO ECOTECH SRL** and the aforementioned third parties and / or websites and / or APP owned or in use at **O.S.D. GRUPPO ECOTECH SRL**.

The Controller has assessed the level of security as appropriate considering the risks that could derive from loss, destruction, modification, unauthorized disclosure, accidental or illegal access, abuse or alteration of your Personal Data. In particular:

- has adopted appropriate security measures for risks;

- keep your Personal Data on servers mainly located in the European territory. In any case, the servers are subject to an advanced and daily backup system.

» Dove trattiamo i tuoi Dati Personali

Your Personal Data are processed mainly at the premises of the Data Controller and in the places where the data processors are located. For further information, contact the Owner at the addresses indicated in the "Identity and contact details of the Data Controller" section.

» For how long we keep your Personal Data

In order to ensure compliance with the principles of necessity and proportionality of the processing, the Controller has identified different times of storage of Personal Data in relation to the individual purposes pursued:

(i) for the purposes of managing your registration on the Site / APP as well as activities related to the activation and use of the services offered therein, to your interaction with the Site / APP and the sections present in it, your Personal Data will be kept for the time strictly necessary and at most until your profile is active. For security reasons, we will use the log data to verify the use of the account and, in case of your inactivity for more than 24 months, you will be contacted to verify your interest in keeping your account active, and you will be indicate how to express this interest. In case of non-activity in the following 30 days, your account will be canceled;

(ii) for the purposes of managing and responding to your requests in relation to products and initiatives of the various brands of the **O.S.D. GRUPPO ECOTECH SRL**, to the advertising, or to the Site / APP ("contact us" section of the Website / APP), your Personal Data will be kept for the time strictly necessary for the fulfillment of your request;

(iii) for marketing purposes, ie for commercial communications, including by e-mail, text message and push notification, concerning the sending of promotional and advertising material relating to any brand of the **O.S.D. GRUPPO ECOTECH SRL** or the carrying out of market research, your Personal Data, excluding contact information, will be kept for a maximum period of 36 months;

(iv) for the purposes of profiling, ie analysis of the habits and / or consumption choices and the comparison of your Personal Data present in the various databases of or in use to **O.S.D. GRUPPO ECOTECH SRL**, for example for the purpose of sending personalized promotional communications, customizing the content displayed on the Website / APP, publication of banners and statistical surveys, the Personal Data contributing to the creation of your profile will be kept for a maximum period of 36 months ;

(v) for the purpose of sending newsletters, your Personal Data, excluding contact information, will be kept for a maximum period of 36 months.

(vi) for the purposes of managing your eventual participation in prize events as well as for the related regulatory, administrative and accounting obligations, your Personal Data will be kept for the duration of each prize event and for the time strictly necessary to the exhaustion of the relative activities;

(vii) for the purposes of the management and execution of the formalities required by law (accounting, administrative, fiscal, etc.), your Personal Data will be kept for the time strictly necessary for this purpose;

(viii) for the purpose of handling disputes and any disputes, your Personal Data will be kept for the time strictly necessary for this purpose and, in any case, no later than the applicable limitation periods.

» Who are the recipients of your Personal Information

Your Personal Information may be disclosed to and processed by:

(i) legal or physical persons acting as external processors, carrying out outsourced activities, appointed by **O.S.D. GRUPPO ECOTECH SRL** or by the external processors of **O.S.D. GRUPPO ECOTECH SRL** (including subjects who are entrusted with assistance, communication, marketing, advertising, promotions and sales of products and / or services as well as advertisers, advertising agencies, IT service providers, site / APP managers, platform managers electronic, partners, lenders, professional offices);

(ii) employees and / or collaborators of the Controller (including system administrators) who, operating under the direct authority of the latter, will be authorized to process your Personal Data;

(iii) employees and / or collaborators of external data controllers (including system administrators) who, operating under the direct authority of external data controllers, will be authorized to process your Personal Data. Your Personal Information will not be disclosed to third parties except in the case where your Personal Data should be disclosed by **O.S.D. GRUPPO ECOTECH SRL** to consultants in order to protect their rights, or disseminated. In the event that you have entered Personal Information in your nickname and / or has also associated it with your own image, it may, however, be disseminated of such Personal Data through the Site or Social Networks.

» Minor children

Minors under the age of 16 must not give information or personal data to **O.S.D. GRUPPO ECOTECH SRL** in absence of the consent of the owners parental responsibility on them. In the absence of such consent, it will not be possible to register the minor with the Website / APP. **O.S.D. GRUPPO ECOTECH SRL** invites all those who exercise parental responsibility on minors to inform them on the safe and responsible use of the Internet and the Web and to put in place the procedures indicated during registration to the Site / APP concerning registration to the Website / APP of subjects under the age of 16.

» Identity and contact data of the controllers

The complete list of data processors may be consulted by contacting the Data Controller at the addresses indicated in the section "Identity and contact details of the Data Controller".

» Contact details of the Data Protection Officer (Data Protection Officer or "DPO")

The Data Protection Officer appointed by the Data Controller has the following contact details dpo@osdgroup.it.

» Your rights in relation to the processing of your Personal Data

The Privacy Policy recognizes you, as an interested party, numerous rights. In particular, you have the right to:

1. obtain from the Controller confirmation of the existence or not of your Personal Data, even if not yet registered and their communication in an intelligible form as well as access to your Personal Data (obtaining a copy) and related information (including the purposes of processing, the categories and the origin of the Personal Data, the categories of recipients to whom they have been or may be communicated, the retention period (when possible), the exercisable rights);
2. obtain from the Owner the correction of your Personal Data and the integration of your incomplete Personal Data;
3. delete your profile on the Site / APP and, in any case, obtain from the Owner the deletion of your Personal Data without undue delay, among other things, when Personal Data are no longer necessary with respect to the purposes for which they were processed or not there is more the legal basis for their treatment;
4. obtain from the Data Controller the anonymous transformation or blocking of your Personal Data processed in violation of the law, including those that do not need to be stored, in relation to the purposes for which the Personal Data were collected or subsequently processed;
5. to obtain from the Owner the limitation of the processing of your Personal Data, inter alia, when you dispute the accuracy or are opposed to processing, for the period necessary for the respective checks;
6. receive, in a structured format, commonly used and readable by automatic device, your Personal Data and transmit or, if technically feasible, obtain the direct transmission of your Personal Data to another data controller without impediments, in cases where the processing is done by automated means and is based on your consent or is necessary for the execution of a contract of which you are a part;
7. withdraw consent to the processing of your Personal Data for any purpose for which it was provided.

You can exercise your rights towards **O.S.D. GRUPPO ECOTECH SRL** by accessing the "Contact / Contact Us" section of the Website / APP or by writing to the following e-mail address dpo@osdgroup.it or by sending to **O.S.D. GRUPPO ECOTECH SRL** a letter by ordinary post to the address indicated in the section "Identity and contact details of the Data Controller".

Moreover, in the event that you believe that the processing of your Personal Data violates the Privacy Law, you can file a complaint with the Guarantor for the protection of personal

data of the State where you live, where is your place of work or where the alleged violation has occurred, or contact the same Authority to request information regarding the exercise of your rights under the Privacy Law.

» The right to object to the processing of your Personal Data

At any time and for reasons related to your particular situation, you have the right to object to the processing of your Personal Data (including profiling) that is necessary for the pursuit of a legitimate interest of the owner or third parties. In this case, the Owner refrains from further processing your Personal Data unless he demonstrates the existence of binding legitimate reasons that prevail over your interests, rights or freedom or is necessary for the assessment, exercise or defense of a right in court.

Without prejudice to your right to withdraw consent for processing for marketing and profiling purposes, you have the right to object to the processing of your Personal Data for purposes of direct marketing, including profiling, to the extent that it is related to such marketing direct, by accessing the "Contact / Contact Us" section of the Website / APP or by sending an e-mail to the following e-mail address: **dpo@osdgroup.it**. If you oppose the processing of your Personal Data for direct marketing purposes, the Data Controller will no longer be able to process them for this purpose.

INFORMATION NOTE ON PRIVACY – COOKIE

Cookies are lines of text that act as computer markers sent by a server (in this case, that of the Website / APP) to a user's device (usually to the Internet browser) when they access a given page of a website; cookies, which can also be set by websites other than those that the user is visiting ("third-party cookies"), are automatically stored by the user's browser and re-transmitted to the server that generated them each time the user accesses the same Internet page. In this way, for example, cookies allow and / or facilitate access to some Internet pages to improve the user's browsing (that is, they allow the memorization of pages visited and other specific information, such as pages viewed more frequently, connection errors, etc.), or allow profiling activities. Therefore, for a facilitated and complete use of a website, it would be advisable for the user to configure his browser in order to accept the receipt of these cookies.

Often browsers are set to automatically accept cookies. However users can change the default configuration, so as to disable or delete cookies (from time to time or once and for all), with the consequence, however, that the optimal use of some areas of the website could be precluded. You can also check the methods and types of cookies stored on your browser by changing the cookie settings of your browser.

» Features and purposes of cookies

Our Website / APP uses the following cookie categories, which may be from **O.S.D. GRUPPO ECOTECH SRL** or third parties.

I. Technical and functional cookies:

a) Technical cookies:

They are used to facilitate your navigation on the Site / APP and the use of its features. Among technical cookies, we report essential cookies, also called "strictly necessary" (strictly necessary), which enable functions without which it would not be possible to fully use the Website / APP as well as performance cookies or "performance cookies" that improve the functionality of the Website / APP.

b) Functionality cookies:

Allow the Website / APP to remember the choices you make (for example the language or the geographical area in which you are) and re-propose the following accesses in order to provide better and personalized services (for example, can be used to offer content similar to those already requested by you).

II. Profiling cookies:

They are used in order to send advertising messages and services in line with the preferences expressed by you. In particular, they are used to offer you advertising and services potentially close to your interests, as well as for the creation of individual profiles on your tastes, your preferences and your consumption choices, as detected during navigation on the Site / APP or through the comparison of the activities performed by you through your browser. For example, they are used to limit the administration of a given advertisement, or to deduce the effectiveness of a campaign from the frequency of display of the related advertising.

» Description of the consent to install cookies

At the first access to the Site / APP, you will find a banner with a brief informative that contains the link to this extended information where you will find more information about cookies installed by the owner and third parties.

In this extended information you will find more information about the description and the characteristics of the different cookie categories and you will have the possibility to decide which cookies to authorize.

For the use of technical and analytical cookies, your consent is not required. You can, however, disable them by following the procedure described in the paragraph "How to enable or disable cookies on your browsers".

Regarding, instead, the use of profiling cookies, useful to send you advertising and services in line with your tastes, your preferences and your consumption choices, your consent is required.

By browsing the Website or using the APP, you consent to the use of cookies, including profiling cookies. In any case, you can at any time change your preferences regarding cookies, even denying consent to the use of any cookies (including cookies installed by third parties) in the table below.

The following table describes the cookies sent to your browser by accessing the Website / APP. The table is updated as of 04/06/2018; any updates will always be published on this page.

» Analytical cookies

- Google Analytics

» Cookie of O.S.D. GRUPPO ECOTECH SRL

COOKIE NAME	SUPPLIER	TYPE	EXPIRY
ASP.NET_SessionId	O.S.D. GRUPPO ECOTECH SRL	HTTP	Session

third-party cookies COOKIE NAME	SUPPLIER	TYPE	EXPIRY
collect	google-analytics.com	Pixel	Session

Below are links to information and consent forms of third parties, independent data controllers, through which you will have the opportunity to collect more information, manage and disable these cookies.

» How to enable or disable cookies on your browsers:

You can block the acceptance of cookies by your browser. However, this operation may make it less efficient or prevent access to certain features or pages of the Website / APP.

Here are the ways offered by the main browsers to block the acceptance of cookies:

Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>

Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Chrome: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>

Safari: <https://support.apple.com/en-us/HT201265>

» Further ways to disable analytical and profiling cookies:

In addition to proceeding with the disabling and / or deletion of cookies through the relative settings of your browser, you can proceed with the disabling and / or cancellation of individual analytical and profiling cookies by accessing the following sites:

- Google Analytics cookie, which is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, that is text files that are stored on the user's computer in order to analyze how users use the Website / APP. The information generated by cookies on the use of the Website / APP by the User will be transmitted to a Google server where they will be stored. Google will use this information to analyze the use of the Website / APP by the user, compile reports on activities on the Site / APP and to provide additional services to the operator of this Website / APP related to use of the Website / APP and use of the Internet Google will not associate the IP address transmitted by the user's browser in the context of Google Analytics to other data held by Google. The user can prevent the storage of cookies by modifying the settings of your browser software but this may make the Site / APP functions less personalized based on user preferences. severe information on the processing of your personal data carried out by Google Analytics at the following address:

https://support.google.com/analytics/answer/1008015?hl=en&ref_topic=3544906

he may also prevent the registration by Google of data produced by cookies and related to its use of the Site / APP (including its IP address) as well as the processing of such data by Google, by downloading and installing the browser plugin available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=it>.

By using the Website / APP, you consent to the processing of your data by Google in the manner and for the purposes indicated in the privacy policy of Google in relation to the use of Google Analytics, accessible at the following link:

<https://policies.google.com/technologies/partner-sites?hl=en>

To disable these cookies visit: **<https://tools.google.com/dlpage/gaoptout?hl=en-GB>**

- To Delete Facebook cookies visited: **<https://www.facebook.com/policies/cookies/>**
- **<http://www.youronlinechoices.eu>**, website managed by the European Interactive Digital Advertising Alliance (EDAA), for the cancellation of other cookies in the case of users based in the European Union.
- <http://www.aboutads.info/choises/>, for the cancellation of other cookies in the case of users residing in the United States of America.

» I social button

The owner uses the social button on the site.

The social buttons are digital buttons or direct links to the social network platforms configured in each individual "button".

With a click on these links, you will be able to interact directly with the account of the owner.

The managers of the social networks to which the buttons refer are independent data controllers. More information on the individual privacy policies of the Social Network platforms and how to manage and deactivate the related cookies can be found on the Social Network platforms.