

PRIVACY POLICY

This policy is drafted pursuant to and for the purposes of Art. 13 of EU General Data Protection Regulation 2016/679 (GDPR)



WHY ARE WE PROVIDING YOU WITH THIS INFORMATION?

Pursuant to Art. 13 of Regulation EU 679/2016 (hereinafter referred to as 'GDPR') this page describes how personal data is processed. This policy is drafted in compliance with the provisions of Art. 13 of GDPR. This policy is not applicable to other websites of Third Parties that may be accessible via links on this website, for which no liability is accepted.

Processable personal data:

- **Personal data:** means any information relating to an identified or identifiable natural person ('**data subject**'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Data of contracting parties / users;**
- **Browsing data:** the computer systems and software procedures used to operate this website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. Such data include IP addresses or user computer and terminal domain names, URI/URL (Uniform Resource Identifier/Locator) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the answering file, the numerical code showing the status of the server answer (successful, error, etc.) and other parameters concerning the user's operating system and IT environment.
- **Data submitted on a voluntary basis:** the discretionary, explicit and voluntary sending of messages to the contact addresses on this website, as well as the completion of data collection forms involves the collection of the sender's address, which is necessary to reply to requests, as well as the collection of any other personal data entered.

Information on the processing of personal data carried out through Social Media Platforms

With regard to the processing of personal data carried out by the social media platform managers used by the Data Controller, please refer to information provided by said managers in their Privacy Policies. The Data Controller processes the personal data provided by users through the pages of the dedicated social media platforms, in order to manage interactions with users (comments, public posts, etc.) and in compliance with current legislation.



COOKIES AND OTHER TRACKING TECHNOLOGIES. WHAT ARE THEY? WHAT ARE THEY USED FOR?

For Cookies and other tracking technologies see the Cookie Policy available in the footer of the website and at the following [link](#).

NACTAROME S.P.A.





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R.E.A MI-2538639 - Capitale sociale Euro 2.091.254,00 i.v.







1. WHO IS THE DATA CONTROLLER? HOW TO CONTACT THE DATA CONTROLLER?





The Data Controller is **NACTAROME S.P.A.**, with registered office in Milan (Italy), via Giovanni Battista Pirelli No. 30, represented by its Pro-Tempore Legal Representative, who can be contacted for any information at the following e-mail address: privacy.nactaromespa@nactarome.com

2. PURPOSE OF PROCESSING, LAWFULNESS OF PROCESSING, DATA RETENTION PERIOD AND NATURE OF DATA PROVISION

 PURPOSE OF DATA PROCESSING	 LAWFULNESS OF PROCESSING	 DATA RETENTION PERIOD	 NATURE OF DATA PROVISION
<p>Navigation of this website.</p> <p>The data necessary for the enjoyment of the web services shall be processed, also with the purpose of</p> <ul style="list-style-type: none"> * obtaining statistical information on the use of said services (most popular pages, number of visitors per time slot or day, geographical areas of origin, etc.); * monitoring the correct operation of the services offered. <p>The data will be used to ascertain liability in the event of any computer offences against the website.</p>	<p>Data processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, having considered the reasonable expectations of the data subject and the activities strictly necessary for the website functionality and navigation.</p> <p>[Art. 6 (1) (f) and recital 47 GDPR]</p> <p>Data subjects can obtain information on the balancing test upon request.</p>	<p>Browsing data will be stored for the duration of the browsing session, except as provided for in the Cookie Policy and except in the event of checks required by the Judicial Authorities to ascertain possible offences.</p>	<p>Provision of personal data is necessary for browsing the website.</p>
<p>Use of cookies and similar technologies.</p> <p>Please refer to the Cookie Policy available in the footer of the website.</p>	<p>For cookies and similar technologies that are not necessary, the processing is based on consent to the processing of personal data [Art. 6 (1) (a) and recitals 42 and 43 GDPR].</p> <p>Consent is given through the consent banner and the Cookie Policy on the website.</p>	<p>Please refer to the Cookie Policy available in the footer of the website.</p>	<p>Please refer to the Cookie Policy available in the footer of the website.</p>

In addition to navigation, personal data will also be processed for:

 PURPOSE OF DATA PROCESSING	 LAWFULNESS OF PROCESSING	 DATA RETENTION PERIOD	 NATURE OF DATA PROVISION
<p>A) CONTACTS, for sending contact requests, requests for information and sample requests.</p>	<p>Data processing is necessary for the management of a contract to which the data subject is party or for the management of pre-contractual</p>	<p>12 months maximum.</p>	<p>The provision of personal data is necessary. Failure to provide the necessary personal data</p>

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	measures taken at the data subject's request [Recital 44 GDPR and Art. 6 (1) (b) GDPR]		will result in the impossibility of being contacted and of receiving information.
B) HANDLING OF YOUR REQUESTS and of requests from other data subjects, pursuant to Articles 15 et seq. of the GDPR (data subject's rights).	Data processing is necessary for compliance with a legal obligation to which the Data Controller is subject (Recital 45 GDPR) Art. 6 (1) (c) GDPR.	5 years after closing of the request, except in the event of litigation.	Provision of personal data is mandatory as it is required for the fulfilment of all legal obligations.



3. TO WHICH RECIPIENTS OR CATEGORIES OF RECIPIENTS WILL PERSONAL DATA BE DISCLOSED? DATA RECIPIENTS

The Personal Data provided may be disclosed to recipients, who shall process them in their capacity as Autonomous Data Controllers or Data Processors (Art. 28 GDPR) and/or as individuals (natural persons) (Art. 29 GDPR) operating under the authority of the Data Controller and Data Processors on the basis of specific instructions given on the purposes and methods of processing. More specifically, data may be transferred to recipients in the following categories:

- entities/parties that provide services for the management of the website and of the communication networks, including e-mail, host and website management (also Group companies, subsidiaries and affiliated companies);
- entities/parties/companies with which the Data Controller has signed business contracts;
- Group companies;
- competent authorities who enforce the law and/or regulations by public bodies, upon request;

The list of the appointed Data Processors under Art. 28 GDPR is available upon request to be sent to the email address privacy.nactaromespa@nactarome.com



4. WILL PERSONAL DATA BE TRANSFERRED TO COUNTRIES OUTSIDE THE EEA?

Personal data may also be transferred abroad to countries outside the European Economic Area in accordance with applicable regulations. In particular, they may be transferred to countries where the companies within the group to which the Data Controller belongs are based. Any transfer of data to countries outside the European Economic Area (EEA) shall only take place subject to appropriate and adequate safeguards for the purposes of the transfer, in accordance with Articles 44 et seq. of the European Regulation.

For further information on the transfer of your personal data, please contact the Data Controller at the email address privacy.nactaromespa@nactarome.com.



5. IS THERE ANY AUTOMATED DATA PROCESSING?

Personal data will be subject to traditional manual, electronic and automated processing. Please note that no fully automated decision-making processes are carried out.



6. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

Data subjects shall be able to exercise their rights under Articles 15 et seq. of GDPR by contacting the Data Controller at the e-mail address: privacy.nactaromespa@nactarome.com.

Data subjects have the right to obtain at any moment from the Data Controller access to their personal data (Art. 15), their rectification (Art. 16) or erasure (Art. 17), as well as the restriction of their processing (Art 18). The Data Controller shall inform (Art. 19) each of the recipients to whom the personal data have been transferred of any rectification or erasure or restriction of processing carried out. The Data Controller shall inform the data subjects of these recipients if the data subjects so request.

Data Subjects shall also exercise their right to data portability (Art. 20) and, in case of data portability requests under Art. 20 GDPR, the Data Controller shall provide the data subjects with the Personal Data concerning them in a structured, commonly used and machine-readable format.

Data subjects shall have the right to object at any time (Art. 21) to the processing of their personal data based on the legitimate interest by writing to the contacts listed above with the 'objection to processing' subject line. If data subjects object to the processing of their personal data based on the legitimate interest, they have the right to request and obtain from the Data Controller information on the Data Balancing Test performed.

In the event that data subjects consider that the processing of their personal data carried out by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, they shall have the right to lodge a complaint with the [National Data Protection Authority](#) (*) of the Member State in which they are habitually resident or work or of the place where the alleged violation took place (* the Italian Data Protection Authority is called *Garante Privacy* and it can be contacted at <https://www.garanteprivacy.it/>). Moreover, they shall have the right to take appropriate legal action.



7. AMENDMENTS TO THE PRIVACY POLICY

The Data Controller reserves the right to amend, update, add or remove parts of this Privacy Policy. In order to facilitate this review, the policy will contain an indication of the date on which it was updated.

Updated on: Sept. 11th 2025