# Data protection

Effective date: 03.05.2023

## Owner and responsible for data processing:

#### Michael Oberhauser

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### Cookie policy:

https://www.pensionpepi.it/en/cookie-policy

In accordance with the ORDINANCE (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, we inform you that we will process personal data of customers and suppliers, as well as data of persons who communicate their data willingly (personally, by phoning, by faxing or by e-mailing to us) and by registering on our website, as well as persons whose data have been acquired by third parties, for example when collecting external data for business information, public directories, etc., whereas in the latter case only personal data of ordinary / common kind and nature is concerned.

Our company guarantees within the framework of legal regulations that the processing of personal data takes into account the fundamental rights and freedoms as well as the dignity of the person concerned, with particular reference to secrecy, personal identity and the right of protecting personal data.

#### Target and purpose positions in data processing:

- fulfillment of legal obligations, duties arising from regulations, community norms as well as civil and tax laws
- fulfillment of any contractual obligations to the person concerned
- performing activities related to the business of our company, such as completing internal statistics, accounting, and managing customer / supplier accounting
- business objectives such as sending business information and promotional material (by post, fax and e-mail), marketing and market research
- protection of claims and management of liabilities
- objectives regarding insurance, especially credit insurance
- area of publication and circulation of data

#### In relation to the above stated objectives, your personal information will be forwarded as needed:

- to the public administration and authorities, if stipulated by law
- to credit institutions our company has business relations with, concerning the management of receivables / payables and financial intermediation
- to all those natural and / or legal, public and / or private persons (legal, administrative and tax consulting offices, courts, chambers of commerce, etc.), if the forwarding proves necessary or convenient for the performance of our duties
- to suppliers / manufacturers, for the execution of the orders
- the personal data processed by our company are not subject to circulation

### What kind of information is collected from you and for how long?

1: Information provided by the user and collected automatically

The personal data stored by our company are collected directly from customers or third parties, such as the hypothesis that the company acquires data from external companies for commercial information, market research, direct offers of products or services. For this last type of data, an informative notice will be provided at the time of its registration or, in any event, no later than the first possible notice.

In addition, our company may possess data that the law defines as "sensitive" in relation to customer-requested transactions. The law requires a specific consent for their utilization.

Each time you visit our platforms, we may collect information about the devices you use and the networks you are connected to when using our services, in accordance with applicable laws and, where applicable, your consent. This may include: IP address, login information, browser type and version, browser plug-in types and versions, operating system and platform, advertising ID, visit information including the clickstream URL to, from and to our platforms, products viewed or searched, download errors, duration of visits to specific pages, interaction on the pages and any phone numbers used to call our customer service. We collect this information using various technologies, including cookies (see our Cookie Policy for more information).

- 2. Time information for the data storage of personal data The processing of personal data takes place in accordance with the information contained in this privacy policy. Regarding the data storage of the data processed by us, we inform you about the following retention periods:
  - 10 years after the last data processing, regarding the established business relationship;
  - 10 years after expiry of the notified period of validity of the offer.

The following categories of personal data may be stored for different periods of time:

• Financial information (such as payments, refunds, etc.) will be retained for the duration required by applicable tax and accounting rules;

 All user-generated content (e.g. comments and ratings) is anonymous, but remains available on our platforms.

#### Type of data processing:

The data processing may be carried out with or without the aid of electronic means - in any case automatic - and includes all the operations required and necessary for the data processing concerned. In any case, the data processing will be carried out in compliance with all security measures that ensure their security and secrecy.

#### Cookies:

To improve the use of our website, we use cookies. Cookies are text information that is stored on a computer via the browser when you visit a website. The information on the cookie policy can be found under its own menu item on the website under the link Cookie Policy.

#### Rights of the person concerned:

The Basic Data Protection Regulation 679/2016 gives the data subject the opportunity to exercise certain rights. In particular, it has the right to obtain information on whether and what kind of its data exist and to obtain in an understandable form details of such data, their origin and the reason for and purpose of their processing, as well as details of the holder and controller of the processing and persons and categories of persons to whom such data may be transmitted.

The data subject has the right to update, correct and complete his data and to request that the data be deleted, blocked and converted into anonymous data if the processing violates the legal provisions. He has the right, for a justified reason, to oppose, in whole or in part, the processing of his data, and for no justified reason, to use data for the purposes of trade information, the sending of advertising material, direct sales, market research and opinion polling.

In addition, since 25 May 2018, data subjects have the right to data portability. For more information, please contact the data controller.

If you believe that your rights have been violated, you have the right to lodge a complaint with the competent data protection authority (Garante della Privacy) or to take legal action. The rights can be asserted on the part of the person concerned or a person commissioned by him, by means of a request to the person responsible for data processing this company - by registered letter or by PEC-mail.