

PERSONAL DATA CHARTER AND COOKIE POLICY

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Preamble

The purpose of this Privacy Policy is to define the policy for the protection of personal data and the use of cookies by the company **REORLD MEDIA ITALIA S.R.L**, a company registered on the Milan Company Register, Tax code and VAT number under the No. 12693020963 and whose registered office is located at Via Bianca di Savoia 12 - 20122 - MILANO (MI) (hereinafter "**Reworld Media Italia**").

REORLD MEDIA ITALIA S.R.L is part of the Reworld Media Group ("**Reworld Media Group**" refers to Reworld Media SA (439 546 011 RCS NANTERRE) and any company that it holds/will hold directly and indirectly under its control).

Reworld Media Italia is the publisher of content, products, and services available on various digital media. This includes the website (hereinafter the "**Site**"), official social networks, newsletters, commercial prospecting and any other existing or future media (hereinafter referred to as "**Media**").

Reworld Media Italia collects and processes Personal Data on its own behalf, as part of its activity, and acts in this regard as the Data Controller within the meaning of EU Regulation 2016/679 of April 27, 2016 (hereinafter the "**Personal Data Regulation**").

Committed to respecting Personal Data, REORLD MEDIA ITALIA attaches particular importance to their protection. This Privacy Policy thus informs you of the methods of collecting and processing your Personal Data, in accordance with the Personal Data Regulation.

Reworld Media Italia reserves the right to modify at any time and without notice the provisions of this Privacy Policy, to comply with any regulatory, editorial, or technical developments. If we make substantial changes to this Privacy Policy, we will notify you by email at the last email address you provided to us, by posting a notice of changes on the Services, or by any other means, in accordance with the Personal Data Regulation.

1. DEFINITIONS

Content: Refers to any information published on the Media, namely any text, image, photo, video, excluding content published by the User themselves when given the opportunity to contribute to the form of comments or sharing on the Site.

Personal Data: Refers to any information relating to an identified or identifiable natural person, either directly or indirectly (for example, names, first names, identifiers, email address, location data, wallet address, etc.).

Minor: Refers to any child under the age of fourteen (14), in accordance with Article 2-quinquies of the Italian New Privacy Code.

Data Controller: Refers to the natural or legal person, public authority, agency, or other body that, alone or jointly with others, determines the purposes and means of processing.

Services: Refers to the provision by Reworld Media Italia of Content on the Media.

Site: Refers to the Internet site <https://reworldmediaitalia.com> published by Reworld Media Italia.

Media: Refers to any means of collecting Personal Data made available by Reworld Media Italia, in paper and/or digital format.

User: Refers to any natural person (customer, prospect, or user) who uses the Services of Reworld Media Italia.

2. THE PERSONAL DATA WE COLLECT AND PROCESS

What Personal Data do we collect directly from you?

Reworld Media Italia collects the Personal Data that you provide when you contact us via the online form.

Before collecting your Personal Data, Reworld Media Italia informs you of the mandatory or optional nature of the data to be provided on its digital or paper forms.

The Personal Data collected directly from you includes:

- Your identification data (name, first name, nickname, login ID, etc.).
- Your contact information (postal address, phone number, email address).
- Data related to your habits and/or preferences.
- Your contributions and comments.

What Personal Data about you do we collect indirectly?

The Personal Data collected indirectly includes:

- Data collected by cookies and other tracking devices. To learn more, please refer to Article 6 of this Privacy Policy.
- Browsing data: connection data (date, time, duration of connection, type of browser, IP address, etc.).
- The URL address of the web page visited.
- The operating system and information regarding the configuration of your device.

3. HOW DO WE USE YOUR PERSONAL DATA?

Your Personal Data are collected and processed by Reworld Media Italia for the sole purposes indicated below. Only data that is adequate and strictly necessary to achieve the concerned purpose may be processed in this regard.

Under no circumstances will your Personal Data be processed subsequently in a manner that is incompatible with these purposes.

Furthermore, Reworld Media Italia is only authorized to process your Personal Data if it has a legal basis for doing so. As a User, Reworld Media Italia collects your Personal Data based on various legal grounds, which can be, depending on the processing concerned: the performance of a contract to which you are a party; compliance with a legal obligation of Reworld Media Italia; your explicit and prior consent, or the legitimate interest of Reworld Media Italia.

Purpose of processing	Legal basis
Management of requests sent through the online form	Consent
Subscription to newsletters or marketing communications from Reworld Media Italia	Consent
Carrying out operations of statistics, analysis, customer, and prospect segmentation to improve our Services	Legitimate interest of Reworld Media Italia in improving its services

Processing your requests for the exercise of rights concerning Personal Data	Legal obligation of Reworld Media Italia (processing requests for exercising rights of the data subjects)
Management of disputes and litigation	Legitimate interest of Reworld Media Italia in asserting its rights in the context of a dispute or litigation

4. TO WHOM ARE YOUR PERSONAL DATA TRANSMITTED?

Within Reworld Media Italia, and in view of each processing, your Personal Data are communicated or made accessible solely to those individuals who require access to it based on the necessities and in consideration of the purpose of the relevant processing.

Your Personal Data may also be communicated to third parties with respect to the corresponding processing purpose, and more specifically:

- To subcontractors commissioned by Reworld Media Italia, especially for the following operations:
 - Carrying out the hosting, maintenance, and technical development operations of the Media.
 - Sending emails and mobile notifications for commercial prospecting.
 - Conducting statistical studies and data analysis.
- To competent authorities upon request.
- To investors or any other third party in connection with any sale operation of the Reworld Media Group or other investment in it (including a merger, acquisition, or sale of all or part of its assets, a change in management, or a collective procedure).

In addition, Reworld Media Italia may use and share with our partners certain anonymous or aggregated technical data concerning you, being understood that this data is not considered personal data as they do not allow the identification of the individuals concerned.

5. ARE YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

By principle, your Personal Data are hosted only within the European Union and are not subject to any transfer outside of this territory.

Some of Reworld Media Italia's partners and service providers may, however, be required to process your Personal Data outside the European Union. Your Personal Data may thus be subject to transfer to non-member countries of the European Union, whose legislation on the protection of personal data differs from that of the European Union. In this case, Reworld Media Italia implements safeguards to ensure an adequate and sufficient level of protection of your Personal Data, such as, for example, the conclusion of standard contractual clauses with the concerned partners and service providers.

You can obtain more information regarding the transfer of your Personal Data, the safeguards put in place by Reworld Media Italia, and obtain a copy of these safeguards by contacting us at the email and postal addresses indicated below in article 8.

6. REWORLD MEDIA ITALIA'S COOKIES AND OTHER TRACKING DEVICES USAGE POLICY

This cookie usage policy explains how cookies and other trackers (hereinafter "**Cookies**") are used on the Site by Reworld Media Italia and our partners and how you can control their usage.

A. What is a Cookie?

A Cookie is a text file that may be placed on your device (computer, smartphone, tablet, etc.) when you visit the Site. Its purpose is to collect information related to your browsing and to send back specific indications or services to you.

In some cases, the Cookies used on the Site may collect Personal Data about you.

When your Personal Data are collected by Reworld Media Italia as Data Controller, it will be processed in accordance with the provisions of this Privacy Policy.

When third-party Cookies allow our partners to collect and process your Personal Data, we encourage you to consult their privacy policy to learn about the conditions under which your Personal Data will be processed. The complete list of partners authorized to place Cookies on our Site, as well as the link to their privacy policy, can be found in the "Cookie Management" tab on our Site.

When you visit the Site, you are informed of the various Cookies and associated processing purposes, and your consent is sought through our consent management platform (CMP). Subject to your consent when it is required, Cookies will be stored on your device.

For each category of Cookies, you have the option to refuse the placement of Cookies on your device at any time through the "Cookie Management" tab, following the procedure described in point C of this article.

B. Different Types of Cookies Used on the Site:

Essential Cookies: These Cookies include functionality cookies, session cookies, and authentication cookies, and are strictly necessary to ensure your navigation on the Site and are activated by default. These Cookies allow us to identify you when you use and return to the Site, by remembering the various choices you made during your last visit to the Site. This allows us to personalize your experience, by simplifying and facilitating your navigation. These Cookies also allow us to save your choice regarding the placement of Cookies.

Through the use of some of these Cookies, Reworld Media Italia may collect and process certain Personal Data in order to pursue the above-mentioned purposes, including your IP address, session identifiers, information relating to your browser and/or your device, your browsing data, and your preferences (including the expression of your choice regarding cookies). The legal basis for the processing of this data is the legitimate interest of Reworld Media Italia in ensuring that its Site functions properly and according to the preferences indicated by each User. Your Personal Data are kept only for the time necessary to achieve the above-mentioned purposes, and in any case for a maximum duration of 13 months.

Audience Measurement and Statistics Cookies: These Cookies allow Reworld Media Italia and our partners to record certain connection information for the purpose of analysing and quantifying the attendance on the Site and then conducting qualitative studies aimed at improving the presentation of the Site and the information disseminated about our products and services. These Cookies are used for the optimization of our Site.

Through the use of some of these Cookies, Reworld Media Italia may collect and process certain Personal Data in order to pursue the above-mentioned purposes, including your IP address, session identifiers, information relating to your browser and/or your device, your browsing data and the pages viewed on the Site. The legal basis for the processing of this Data is your consent. Your Personal Data are kept only for the time necessary to achieve the above-mentioned purposes, and in any case for a maximum duration of 25 months. Data relating to your consent may be kept for a longer period in order to anticipate any action or investigation aimed at verifying or challenging Reworld Media Italia's compliance with its obligation to collect user consent.

The list of our partners authorized to place audience measurement and statistics cookies, subject to your consent, is accessible in the "Cookie Management" tab on the Site.

C. Cookies Settings

When the cookie banner appears on the Site, you can choose to configure your preferences by categories of Cookies. The "Manage my choices" button in the banner brings up a settings screen that allows you to learn about the categories of Cookies used on the Site and to select the purposes of Cookies that you accept or reject.

You can change these settings at any time by clicking on the "Cookie Management" tab, accessible from all pages of the Site.

You also have the option to configure your browser to manage your preferences regarding Cookies. In this regard, the configuration process for each browser is different and is described in the help menus of your browser, accessible via the links below:

for Firefox:

<http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>

for Internet Explorer: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>

for Microsoft Edge: <https://privacy.microsoft.com/fr-fr/windows-10-microsoft-edge-and-privacy>

for Chrome: <http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>

for Opera: <http://help.opera.com/Windows/10.20/fr/cookies.html>

for Safari: <http://support.apple.com/kb/PH5042>

Your choices regarding the acceptance or refusal of Cookies on the Site are saved for six (6) months, after which you will be asked again to express your agreement, refusal, or configuration of Cookies

7. WHAT IS THE RETENTION PERIOD FOR YOUR PERSONAL DATA?

The retention period of your Personal Data depends on the purpose of the processing concerned (article 3 of this document). Your Personal Data are retained for the period necessary for the proper achievement of the purpose pursued, as defined in the table below.

Purpose of processing	Data retention period
Management of requests sent through the online form	3 years from the last contact originating from the person concerned
Subscription to newsletters or marketing communications from Reworld Media Italia	3 years from the last contact originating from the person concerned
Carrying out operations of statistics, analysis, customer, and prospect segmentation to improve our Services	Up to 2 years from the completion of the operation
Processing your requests for the exercise of rights concerning Personal Data	5 years from the closure of the request
Management of disputes and litigation	Until the definitive amicable resolution of the dispute or litigation, or until the exhaustion of legal remedies

However, depending on the purposes pursued, REWORLD MEDIA ITALIA reserves the right to implement a process of anonymizing your Personal Data.

8. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA? HOW CAN YOU EXERCISE THEM?

Your rights

You have the right of access, rectification, erasure, restriction, and objection regarding the processing of your Personal Data, as well as the right to the portability of your Personal Data and

the right to set guidelines concerning the fate of your Personal Data after your death, by submitting your request to the addresses indicated below.

These rights are exercised under the conditions provided by the Personal Data Regulation.

Right of access: The right of access allows you to know if data concerning you are being processed by Reworld Media Italia and, if so, to inform you of the Personal Data concerned as well as the characteristics of the processing carried out.

Right of rectification: The right of rectification allows you to correct inaccurate information or complete incomplete information about yourself in connection with the purpose of the processing. This right prevents Reworld Media Italia from using or disseminating incorrect information about you.

Right to erasure ("right to be forgotten"): The right to erasure allows you to request that Reworld Media Italia delete your Personal Data. You can exercise this right when one of the following reasons applies, in accordance with Article 17 of the GDPR:

- Your Personal Data are no longer necessary in relation to the purposes for which it was initially collected or processed,
- You withdraw your consent to the use of your Personal Data and there is no other legal basis for the processing in question,
- Your Personal Data are subject to unlawful processing,
- You were a minor when your Personal Data was collected as part of an information society service offer (blog, forum, social network, website...),
- Your Personal Data must be erased to comply with a legal obligation to which Reworld Media Italia is subject.
- You have objected to the processing of your Personal Data and there are no compelling reasons for Reworld Media Italia to continue the processing.

Right to restriction of processing: The right to restriction of processing allows you to request Reworld Media Italia to limit the processing of your Personal Data when one of the following applies:

- You contest the accuracy of your Personal Data for a period enabling us to verify the accuracy of the data,
- Following processing that has been established as non-compliant, you prefer the restriction of processing over the complete erasure of your Personal Data,
- We no longer need your Personal Data for the purposes of the processing, but you still require them for the establishment, exercise, or defence of legal claims,
- You have objected to the processing of your Personal Data, and you want the processing to be restricted while we verify whether the legitimate grounds you have provided are justified.

Restriction of processing means that the processing of your Personal Data will only include the storage of the relevant data. We will not perform any other operations on these Personal Data.

Right to data portability: The right to data portability allows you to receive your Personal Data in a structured, commonly used, and machine-readable format, or to request that we transfer them directly to a third party of your choice when this is legally and technically feasible.

Right to object: The right to object allows you to object to the processing of your Personal Data for legitimate reasons related to your situation when this processing is based on the pursuit of Reworld Media Italia's legitimate interest. We will then cease the processing in question unless there are compelling legitimate grounds for continuing the processing in compliance with the applicable regulations.

Right to set guidelines concerning the fate of your Personal Data after death: This right allows you to provide instructions regarding the retention, deletion, and communication of your Personal Data after your death. A person can be designated to carry out these instructions.

Finally, when we process your Personal Data based on your consent, you can withdraw your consent at any time by contacting us or, where applicable, by clicking on the unsubscribe link in each of our marketing communications. However, withdrawing your consent does not affect the lawfulness of processing that occurred before this withdrawal.

Exercise your rights and contact details of our Data Protection Officer

In accordance with the Regulation (EU) 2016/679, known as the General Data Protection Regulation (GDPR), you can exercise your rights by contacting our Data Protection Officer:

either by mail at the following postal address: REWORLD MEDIA ITALIA S.R.L - Via Bianca di Savoia 12 - 20122 - MILANO (MI)

or by email at the following address: dpo.italy@reworldmedia.com

Subject to the conditions provided by the Personal Data Regulation, you can exercise your rights at any time and free of charge.

When the request is admissible, legitimate, and not excessive, Reworld Media Italia commits to comply with the request within one (1) month from the receipt of the request, this period may be extended by two months considering the complexity and the number of requests, in which case Reworld Media Italia will inform you of this extension and the reasons for the delay in responding to your request.

When the request is manifestly unfounded or excessive, particularly due to its repetitive nature, Reworld Media Italia reserves the right to refuse to comply with your request.

Any request to exercise one of your rights addressed to Reworld Media Italia in its capacity as Data Controller by postal mail must be dated and signed and specify the address to which the response must be sent.

In case of reasonable doubts regarding the identity of the person making a request, Reworld Media Italia reserves the right to request additional information, including, when necessary, a photocopy of an identification document bearing the holder's signature.

9. WHAT PROTECTION AND SECURITY MEASURES HAVE WE IMPLEMENTED?

Security and data protection

The Personal Data collected by Reworld Media Italia are stored in a secure environment and are hosted by the provider identified in our Legal Notices.

Reworld Media Italia undertakes to take all necessary technical and organizational measures to ensure the security of your Personal Data, with the aim of protecting them, in particular against any loss, destruction, alteration, fraudulent access or retention. These measures involve physical security at our premises and the security of our computer systems.

Reworld Media Italia ensures the compliance of its subcontractors with the Personal Data Regulation.

Social Networks

You can consult the social networks of Reworld Media Italia (LinkedIn) to follow our Content and be informed of ongoing commercial offers.

The use of social networks may result in data exchanges between Reworld Media Italia and these social networks. In this regard, Reworld Media Italia may collect anonymous data about you in order to compile statistics on the number of registrants.

Reworld Media Italia encourages you to consult the privacy policies of each of the concerned social networks for more information regarding the processing of your Personal Data when using these social networks.

Minors

Minors cannot under any circumstances give their consent to the processing of their Personal Data for the purpose of providing Services on the Platforms without prior parental authorization. Minors

can only provide the necessary information for the Services with the prior agreement of the individuals holding parental authority. The use of the Services by a Minor remains under the full responsibility of the individuals holding parental authority.

Holders of parental authority are encouraged to monitor the use made by their children of the Services and to keep in mind that the Services are intended to reach a broad audience, and as legal guardians, it is the responsibility of the parents to determine which Service is or is not appropriate for their child(ren) and to monitor their use of it.

The Minor expresses his/her consent jointly with that of the holder of parental authority.

Reworld Media Italia reserves the right to verify at any time the consent given by the holder of the parental authority of the Minor.

10. COMPLAINTS REGARDING THE PROCESSING OF YOUR PERSONAL DATA

For any question or request related to this Privacy Policy, including the exercise of your rights regarding your Personal Data, you can contact Reworld Media Italia at the contact addresses mentioned in Article 8 above.

If the response provided is not satisfying according to you, you have the right to file a complaint with the Italian Data Protection Authority ("Garante per la protezione dei dati personali"):

by postal mail : Garante per la protezione dei dati personali
Piazza Venezia 11
00187 - Roma

on the Garante per la protezione dei dati personali's website: <https://www.garanteprivacy.it/>